# INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA OF THE SUPPLIERS

# PURSUANT TO ARTS. 13 AND 14 OF EU REGULATION 2016/679 ("GDPR")



# DATA CONTROLLER

#### IMEAR S.r.l.

with registered office in Bagnolo Mella (BS) via Maresciallo di Bernardo, 8 – 25021 - Italy VAT number: IT01939690986 Tax Code: 00132960352 e-mail: gdpr@cobogroup.net ("Company" or "Controller").

# PERSONAL DATA PROCESSED AND SOURCE OF DATA

The term "Data" means:



- in the case of a <u>legal entity</u> "Supplier": common Data (such as name, and surname, telephone, role and company e-mail) of the natural persons processed by the Company for the conclusion and execution of the contract, such as the legal representative of the Supplier and the employees/collaborators of the Supplier involved in the activities under the contract; in the latter case, the source of the Data is the Supplier;
- in the case of a <u>natural person</u> "Supplier": common Data related to the Supplier (such as name and surname, telephone, any professional qualifications and e-mail contact).

DATA PROCESSING PURPOSES	LEGAL BASIS OF THE PROCESSING	DATA RETENTION PERIOD
Purposes relating to establishing and executing the contractual relationship between the Supplier and the Company.	In case the Supplier is a natural person, performance of a contract to which the data subject is a party, art. 6.1, let. b), GDPR.  Regarding the Data of the Supplier's employees/collaborators, the legitimate	For the duration of the contractual
	interest of the Company, art. 6.1, let. f), GDPR.	relationship and, after termination, up to a maximum of 10 years.
To fulfil administration/accounting requirements, such as accounts and treasury management, invoicing (e.g., logging and checking invoices) in accordance with legislation.	Requirement to meet the Company's legal obligations, pursuant to art. 6.1, let. c), GDPR.	For the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies.
If necessary to ascertain, exercise and/or safeguard Company rights in legal proceedings.	Legitimate interest, pursuant to art. 6.1, let. f), GDPR.	

Once the aforementioned retention period has lapsed the data will be destroyed or made anonymous compatibly with technical erasure and backup procedures.



### **DATA PROVISION**

Data **must be provided** to agree and/or execute the contract. Refusing to provide the Data means it will not be possible to establish the contractual relationship and/or fulfil the resulting contractual obligations.



# DATA RECIPIENTS

The Data may be communicated to subjects operating as autonomous data controllers, such as public authorities or professional firms, or processed, on behalf of the Company, by subjects who provide services functional to the fulfilment of the aforementioned purposes, designated as data

**processors** pursuant to Article 28 of the GDPR.

In addition, the Data are processed by the employees of the Company belonging to the corporate functions assigned to the pursuit of the aforementioned purposes, who have been expressly authorized to process them and have received adequate operational instructions.



#### PERSONAL DATA TRANSFERS OUTSIDE THE EU

Data will not be transferred to entities established in third countries, i.e., outside the European Union and the European Economic Area.

# DATA SUBJECTS' RIGHTS - COMPLAINT TO THE SUPERVISORY AUTHORITY

By contacting the Company by post to the address via Tito Speri, n. 10, 25024 - Leno (BS) – Italy – or via e-mail sent to **gdpr@cobogroup.net**, data subjects can ask the Company for access to personal data, or the correction or deletion of personal data, and also have the right to restrict processing of the data in the cases set out in article 18 of the GDPR, and object to processing in the case of legitimate interests of the controller.



Furthermore, in the case where processing is based on consent or a contract and carried out with automated tools, data subjects have the right to receive the personal data in a structured, commonly used, and machine-readable format, and to transmit the data to another data controller without obstruction.

The data subject has the right to object at any time, easily and free of charge, for reasons related to the particular situation, to the processing of Data in cases of legitimate interest of the Data Controller.

Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or work, or the member state where the alleged breach took place.

Addendum 4.d Annex F GP1.001, Version 00 of 01/08/2023