

SUPPLIER POLICY
ON THE PROTECTION OF PERSONAL DATA
PURSUANT TO ART. 13 OF LGS. D. NO. 196 OF 30.06.2003

Whereas,

- pursuant to art. 4 letter f) of Lgs.D. 196/2003, as amended and supplemented, the Data Controller is the natural or legal person responsible for taking decisions regarding the purposes and methods of personal data processing and the tools used, including the security profile;
- pursuant to art. 4 letter i) of Lgs.D. 196/2003, as amended and supplemented, following a change in legislation, by data subject is meant the natural person to whom the personal data belongs, thus excluding legal persons;
- pursuant to art. 13 of Lgs.D. 196/2003, as amended and supplemented, the Data Controller is required to inform the data subject or the person from whom the personal data is collected in advance regarding its processing;
- in compliance with art. 13, paragraph 4, of Lgs.D. no. 196/2003, as amended and supplemented, in the case of relations between legal persons, through the supplier (legal persons) of the data controller, the policy will be provided to any data subjects involved in the related processing should they work for, provide professional services to or collaborate with the aforementioned supplier and to those whose data may nevertheless be disclosed, known and/or processed by the Data Controller in the performance and execution of the main relationship.. In any case, it will be the supplier's responsibility to ensure that the data subject is fully aware of its essential elements.

Now, therefore, **Altaeco S.p.a.**, with registered office in Via Giovanni Pascoli 4/6, 20010 Vittuone, Milan (MI), as Data Controller, hereby informs suppliers about the processing purposes and methods of the personal data collected, its scope of disclosure and dissemination, as well as the nature of its provision.

PERSONAL DATA SUBJECT TO PROCESSING AND PROCESSING PURPOSE

The identification, accounting, commercial, administrative, fiscal and IT personal data collected, directly referring to the supplier and disclosed in execution and performance of the relations with the Data Controller and in compliance with the provisions on the processing and protection of personal data, is used by the Data Controller in full compliance with the principle of correctness and legality and with the provisions of the law in order to fulfil purposes instrumental to the performance of the pre-contractual and/or contractual relationship in place, which consists of the management of services, also of a professional and qualified nature, moreover related to the aforesaid activities of archiving, invoicing, processing and recording.

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DATA PROCESSING METHODS

Data processing is carried out through IT procedures or in any case telematic means or on paper by internal or external parties specifically appointed for such purpose or committed to confidentiality. The data is stored in IT and electronic files, with full assurance of implementation of the minimum security measures required by law.

DISCLOSURE AND DISSEMINATION

The data collected will not be disclosed or disseminated. Disclosure to third parties, other than the Data Controller, Data Processors and persons responsible for processing identified and appointed pursuant to arts. 29 and 30 of Lgs.D. no. 196/2003, as amended and supplemented, to public bodies for legal compliance, as well as to third parties and companies such as banks, credit institutions and companies strictly related to credit collection, legal and industry consultants and auditors, parties with administrative and contractual consultancy functions and third party suppliers of technical and IT support engaged in the proper and due pursuit of the described purposes is envisaged. In all cases data processing by third parties must be performed lawfully and in compliance with the laws currently in force.

RETENTION TIMES

The data will be kept for the time necessary to pursue the administrative, accounting and fiscal purposes relating to the relationship established and also deriving from the obligations provided for by law, in any case within the statutory limits established for the rights and obligations underlying such processing.

RIGHTS OF THE DATA SUBJECT

The data subject may exercise his/her rights as provided for by articles 7, 8, 9 and 10 of Lgs. Decree no. 196. issued on 30 June 2003 by contacting the Data Controller. In particular, according to art. 7, the data subject has the right to obtain confirmation of the existence or otherwise of personal data related to him/her, including data that has not yet been recorded and to obtain that data in a clearly understandable form. The data subject has the right to obtain information regarding: a) the source of any personal data; b) the purposes and methods of processing; c) the logic applied in the event of electronic processing; d) identification details relating to the Data Controller, the data supervisors and the representative designated in compliance with article 5, paragraph 2; e) the subjects and categories of subjects to whom the personal data may be communicated or who may become acquainted with said data, in their capacity as data supervisors, persons in charge of data processing and appointed representatives in Italy. The data subject has the right to obtain: a) that said data is updated, amended and, if in the interest of the data subject, completed; b) that any data processed in violation of the law be cancelled, made anonymous or blocked, including any information that does not need to be held for the purposes for which it was collected or subsequently processed; c) receive confirmation that the operations in a) and b) have been made known, also as regards their content, to the parties to whom the data has been communicated or disclosed, except in cases where this is impossible or requires the use of means that are clearly disproportionate with the protected right. The data subject has the right to object to processing within the terms and in the manner provided for by the provisions mentioned above.

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DATA CONTROLLER, DATA PROCESSORS AND PRIVACY COMMUNICATION

The Data Controller is **Altaeco S.p.A.**, with registered office in Via G. Pascoli 4/6, 20010 Vittuone, Milan (MI).

The updated list of data processors is available at the company's registered office. For any communication regarding articles 7 et seq of Lgs.D. no. 196/2003, as amended and supplemented, the Data Controller has provided the e-mail address privacy@altaeco.com

NATURE OF PROVISION

Provision of data is mandatory for the obligations required and punished by law; otherwise, provision is optional but any refusal by the data subject shall prevent the data controller from proceeding with the relationship being established and its detailed execution.

CONSENT

Pursuant to art. 24, paragraph 1 of Lgs.D. 196/2003, as amended and supplemented, consent to the processing of such data is not necessary since it is collected in order to fulfil legal obligations and/or for execution of the obligations deriving from the existing contract or of the so-called pre-contractual obligations.

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