

# Disclosure pursuant to art. 13, EU Regulation 2016/679 for the processing of personal data through the supplier portal

#### **Data Controller**

We inform you that, pursuant to **art. 13 of EU Regulation** 2016/679 ("**Regulation**"), personal data relating to your company ("**Supplier"**) and to natural persons acting in the name of and on behalf of it ("**Contact Persons**"), collected from the Supplier, shall be processed by Granarolo S.p.A. with registered office in Bologna – Via Cadriano 27/2 as Data Controller ("**Data Controller**"), which may also be contacted by e-mail: <u>privacy@granarolo.it</u>.

The Data Protection Officer ("DPO") may be contacted using the following e-mail address: <a href="mailto:dpo@granarolo.it">dpo@granarolo.it</a>.

## Types of data processed

The Data Controller shall process your personal data, collected as part of registration to the supplier portal, including, but not limited to, given name, surname, mobile phone number, e-mail address and in general your contact details as a legal representative or contact person in commercial relations arising as part of future supply contracts. Furthermore, the Data Controller shall process the data collected in order to manage the supplier's profiles and, if necessary, to invite them to make offers.

## Purpose, legal basis and optional nature of the processing

Your personal data shall be processed for the following purposes:

- a) fulfilment of the contract and/or pre-contractual measures, including the management of the expression of interest and the request for the submission of offers;
- b) to fulfil any legal obligations
- c) in the event that it is necessary to ascertain, exercise or defend a right in court, for the pursuit of a legitimate interest that the Data Controller has deemed to exist based on the balancing of interests.

The legal bases of processing for purposes a), b) and c) are respectively articles 6.1.b), 6.1.c), 6.1.f) and 9.2.f) of the Regulation.

The provision of your personal data for purposes a), b) and c) above is optional, but if not provided it shall not be possible to proceed with registration on the supplier portal.

### Recipients and transfer of personal data

Your personal data may be shared with: natural persons authorised by the Data Controller to process personal data pursuant to art. 29 of the Regulation due to the performance of their job duties (e.g. employees and system administrators, etc.); service providers (such as consultants, credit institutions, etc.) which typically act as data processors pursuant to art. 28 of the Regulation (the complete and updated list of data processors is available on the website <a href="http://www.gruppogranarolo.it/privacy">http://www.gruppogranarolo.it/privacy</a>); parties, entities or authorities, independent data controllers, to which it is required to communicate your personal data according to the provisions of law or orders of the authorities.

Data may be accessible to other companies of the Granarolo Group for the same purposes as above and/or for administrative and accounting purposes pursuant to art. 6.1.f) and to Recitals 47 and 48 of the Regulation. With regards to any transfer of Data to Third Countries, the Data Controller informs that the processing shall be carried out according to one of the procedures permitted by applicable law, such as the consent of the data

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subject, the adoption of Standard Clauses approved by the European Commission, the selection of parties adhering to international programmes for the free flow of data (e.g. EU-USA Privacy Shield) or operating in countries considered safe by the European Commission. It is possible to obtain more information, upon request, from the Data Controller using the above contact details.

## Storage of personal data

Your Personal Data shall be kept only for the time necessary for the purposes for which collected, in compliance with the principle of minimisation referred to in article 5, paragraph 1, letter c) of the GDPR. The Data Controller may store some data even after the termination of the contractual relationship, for the time necessary to fulfil contractual and legal obligations. Further information is available from the Data Controller using the above contact details.

## Methods of data processing

In relation to the aforementioned purposes, the processing of personal data takes place using manual, computerised and electronic equipment with reasoning strictly related to the purposes themselves and, in any case, in such a way as to ensure the security and confidentiality of the data, in addition to compliance with specific obligations established by the law.

## Your privacy rights

You are entitled to ask the Data Controller, at any time, for access to your personal data, rectification or deletion thereof or to object to its processing. You are entitled to request the restriction of processing in the cases set forth by art. 18 of the Regulation, to revoke consent given pursuant to art. 7 of the GDPR at any time; to obtain data concerning you in a structured, commonly used and machine-readable format, in the cases set forth by art. 20 of the Regulation; and to lodge a complaint with the respective supervisory authority pursuant to article 77 of the GDPR (Personal Data Protection Authority), if you consider that the processing of your data is contrary to the legislation in force.

You may submit a request to object to the processing of your data pursuant to article 21 of the GDPR providing evidence of the reasons justifying the objection: the Data Controller reserves the right to evaluate your request, which shall not be accepted in the event of imperative, legitimate reasons to proceed with processing that prevail over your interests, rights and liberties.

Requests should be sent in writing to the Data Controller using the contact details indicated above.