

## NOTICE TO CUSTOMERS AND SUPPLIERS

### WITH REGARD TO PERSONAL DATA PROTECTION PURSUANT TO ART. 12 and FOLLOWING ARTICLES REGULATION (EU) 679/2016

Our Company has always been deeply concerned about the issues of personal data protection and the compliance with the principles of the privacy and dignity of individuals.

Pursuant to the new Regulation (EU) 679/2016, in compliance with the principle of responsibility undertaking any processing of personal data shall be lawful and correct. The manner by which a personal data related to natural persons is collected, consulted or otherwise processed shall be transparent to them, as well as the extent to which such data is or will be processed. The transparency principle requires that any information and communication related to such data are easily accessible and comprehensible and that a plain and clear language is used.

This principle particularly applies to the information given to the data subjects about the Controller's identity and the purposes of the processing, as well as some further information (pursuant to art. 13 and 14 of Regulation (EU) 679/2016) in order to ensure a correct and transparent processing with respect to the natural persons involved and to their rights to obtain the confirmation and the notice of a processing of personal data concerning them (in this respect see the Regulation (EU) 679/2016, Recital no. 39).

In this respect you are kindly requested to take note of the following notice

Tricobiotos S.p.a, established in Via di Spicciano 11, 59021 Vaiano (PO), fiscal code 03398600480 and VAT number 00300020971, in their quality of Controller, in the person of the acting legal representative, under and in pursuance of the Regulation (EU) 679/2016, hereby inform the data subject that the personal data concerning such subject, collected by the Controller or which will be

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subsequently requested and/or disclosed by third parties, are necessary and will be used for the purposes indicated here below.

## PURPOSES AND LAWFULNESS OF THE PROCESSING

Under Regulation (EU) 679/2016 personal data shall be:

- Processed in a lawful, fair and transparent way with respect to the data subject (art. 5)
- Collected for identified, explicit and legitimate purposes and subsequently processed in a way that shall not be incompatible with such purposes (art. 5);

The purposes for which personal data are collected shall be the following:

- In view of subsidiary activities and/or as a supplement to such activities enabling to develop the contractual/pre-contractual relationship in force .
- General accounts keeping, invoicing, credit managing, civil and fiscal obligations under the law and the updating of archives.
- Survey of the data subject's satisfaction about the quality of products and of the services delivered by us, including statistical surveys.
- The data shall be processed for the mailing of service information, the handling of inquiries, advices and claims in connection with the existing contractual relationship as well as for the fulfilment thereof.

The personal data, if any, concerning the data subject or gathered with him or her, upon prior consent, can be used for marketing purposes ( i.e., as mere examples, to promote advertising or trading events, to launch advertising campaigns, promos and offers), purposes which can be achieved either by automated means, or otherwise in traditional manners.

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## MODALITIES OF PROCESSING AND OBLIGATION OF CONFIDENTIALITY

The data processing is carried out through computerized systems and/or paper documents by subjects committed to confidentiality, following purpose related methods and however in such a way as to ensure the safeguard and the confidentiality of data. In compliance with law provisions the data collected shall not be disclosed and divulged to third parties.

## DISCLOSURE TO THIRD PARTIES

Your personal data may be disclosed to third parties known to us solely for the aforementioned purposes and, in particular, to the following categories of subjects:

- External companies providing services on our behalf;
- Public Administration companies or bodies for the compliance with law requirements
- Professionals who may provide a support in the compliance with law requirements;

Such subjects will process personal data in their quality as external Processors.

Your data maybe transferred within the EU Countries.

## RETENTION PERIOD

Pursuant to art. 5 of the Regulation (EU) 679/2016 “Principles relating to the processing of personal data”, personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the achievement of the purposes for which the data are processed.

The personal data of data subjects can be kept for longer periods in compliance with the law provisions in force (for instance in accounting matters), and, nonetheless, any technical and

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organizational measure shall be adopted in order to generate processes of anonymization of data.

## RIGHTS OF THE DATA SUBJECT

Under the law provisions in force, the data subject can address the Controller to lodge a request for exercising his or her rights, such as they are stated in the Regulation (EU) 679/2016,

namely:

### RIGHT OF ACCESS BY THE DATA SUBJECT

#### art. 15

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

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e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;

f) the right to lodge a complaint with a supervisory authority;

g) where the personal data are not collected from the data subject, any available information as to their source;

h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

1. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

2. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

## RIGHT OF RECTIFICATION

### art. 16

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

## RIGHT TO ERASURE

### art. 17

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
- c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;

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f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

## RIGHT TO RESTRICTION OF PROCESSING

### art. 18

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

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- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
  - b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
  - d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.
2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

## RIGHT TO DATA PORTABILITY

### art. 20

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:
- a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
  - (b) the processing is carried out by automated means.

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2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

## RIGHT TO OBJECT

### art. 21

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

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6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In addition to the above mentioned rights, the data subject has the right to lodge a complaint with the Supervisory Authority in the instances envisaged by law.

For further information with regard to the modalities to exercise the mentioned rights, please read “ Procedure concerning the rights of the data subject” in the link [www.tricobbiotos.it](http://www.tricobbiotos.it) .

## CONTROLLER, DPO IF ANY AND PRIVACY COMMUNICATIONS

The Controller is Tricobbiotos S.p.a, established in Via di Spicciano 11, 59021 Vaiano (PO), fiscal code 03398600480 and VAT number 00300020971.

For any communication pursuant to the above quoted articles of the Regulation (EU) 679/2016 the Controller provides the following address: Via di Spicciano 11, 59021 Vaiano (PO); Phone number 0574 946237, Fax 0574 987128, Email ([info@tricobbiotos.it](mailto:info@tricobbiotos.it)).

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