

With the present, Mrs **Lorena BENTIVOGLIO**, in the role of CEO/CFO of BINARY SYSTEM S.r.l. with headquarters in Piacenza, Via F. COPPALATI 6/B - **HOLDER OF PROCESSING** - provides the fundamental information related to the processing of data carried out by the company itself to all suppliers

## NATURE OF PROCESSED DATA AND PURPOSE

### Purpose of the processing:

- Management of the commercial relationship
- Tax and legal obligations in general

### Legal basis of processing:

- Necessary processing for the execution of contractual obligations
- Necessary processing for the fulfillment of legal obligations

### Personal data processed:

- Company data: Registry
- Personal data of the supplier's workers: common contact data
- Operational data: data on products/services purchased and supplied, contractual and accounting documents, communications received, etc.

The data that supplier will request or which will in any case deal with the COMPANY are summarized in the previous information row. The COMPANY conducted a risk assessment of the data processed, formalized in the **REGISTER OF PROCESSING** form, which can be viewed for the part of its competence.

The data will be requested directly to supplier by our staff, or registered as a result of the activities carried out.

The processing to which the requested or acquired data will be submitted, both prior to the establishment of the contractual relationship and during the course of this, will have the purpose of fulfilling legal and contractual obligations related to the management of the relationship, verifying the correct fulfillment of these obligations on the part of the COMPANY and to allow the best business activity of the same.

The COMPANY reserves the right to disseminate data relating to the supplier (eg Case History) in corporate communication activities, as an indicative and non-exhaustive publication on social media, publication of articles in specialized press, etc. In this case, however, the content will be previously submitted to the supplier for approval.

Personal data will be kept for the duration of the contractual relationship. After this deadline, the data processed in compliance with legal obligations will be kept in compliance with the deadlines established by the reference standards. The other data, not necessary for the purposes of the law, may be destroyed or kept for historical memory.

## PROCESSING MODALITY

The *Data Protection Officer* appointed by the Holder is Alessandro RESCALLI - classified in the company workforce as CTO.

The company data will be managed in paper or electronic form and will be kept both in the office and on the servers available to the COMPANY.

The processing may be carried out with or without the aid of electronic or automated means and may consist of any operation or set of operations indicated in art. 4 paragraph 1 letter a) and necessary for the processing in question. In any case, this processing will be carried out in compliance with the limits and conditions set forth in art. 13 D.Lgs. 196/2003, with the adoption of appropriate measures to ensure the integrity, correctness and confidentiality of data, commensurate with the risk assessment conducted.

There are no automatic decision-making procedures.

Personal data will be stored until the possible revocation of consent. In this case, the data of the interested party will be immediately canceled, giving notice to the interested party.

#### EXTERNAL SUBJECTS TO WHICH THE DATA CAN BE COMMUNICATED

Supplier data will be managed with the utmost seriousness and confidentiality. The COMPANY undertakes not to communicate or disseminate for any purpose other than those specifically indicated above, any personal information concerning the supplier which will become known during the contact, except for the following cases:

- communication of some of the data processed to external professionals under suitable security measures for the smooth running and improvement of company activities (eg Quality, etc.).

The data may be transferred abroad and in countries outside the European Union within the scope of processing, with the adoption of appropriate data protection measures required by current regulations.

#### RIGHTS

The COMPANY informs the supplier about its data processing rights:

- The provision of data is optional, unless required by specific laws, contractual, administrative and regulatory.
- Any partial or total refusal to provide data and/or their processing could result in the non-optimal management of the contractual relationship or the impossibility to establish or continue the contractual relationship, in the event that the available data were not found complete, correct and sufficient for the management of the relationship in relation to legal obligations or internal company regulations.
- At any time, supplier can request the COMPANY, in writing, of:
  - obtain confirmation of the existence or not of personal data concerning the supplier itself, even if not yet registered, and their communication in an intelligible form.
  - know the origin of personal data, the purposes and methods of processing, the logic applied in case of processing carried out with the aid of electronic tools, the identification details of the Data Controller, the Data Processors and the designated representative, subjects or categories of subjects to whom personal data can be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents.
- At any time the supplier has the right to obtain:
  - updating, rectification or, when interested, integration of data;

- the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed
- the attestation that the operations referred to in the previous points have been notified to external parties to whom the data have been communicated or disseminated (unless this is impossible or requires a disproportionate effort with respect to the protected right).
- At any time supplier have the right to revoke the consent given to the processing of its personal data, without prejudice to the processing carried out by the COMPANY until the moment; the total or partial withdrawal of the consent could lead to the impossibility to continue the established contractual relationship.
- Supplier have the right to lodge a complaint with the competent authority regarding the protection of personal data (Privacy Guarantor), if deemed necessary.
- Finally, supplier has the right to object, in whole or in part:
  - for legitimate reasons, the processing of personal data concerning him, even if pertinent to the purpose of the collection;
  - to the processing of personal data concerning him for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.
- The exercise of the above rights, obviously, applies within the limits granted by the laws in force and the company regulations.
- In exercising its rights, supplier may delegate another person, through a formal documented proxy.

### OBLIGATION

The supplier guarantees that the data communicated to the COMPANY, in the contractual relationship, are acquired and processed for lawful purposes, in compliance with the regulations in force on data protection.

#### Confidentiality

For the purposes of this point, the term "Information" means, in addition to the Contract and its entire content, any fact, data (including personal data) or information that the supplier becomes aware of orally, in electronic format visually, in writing or in any other tangible or intangible form, due to or during the execution of the contract, including, without limitation, information on know-how, commercial, organizational, corporate, strategic, related documents to the organization of the business, the activity, the commercial strategies, the future activities, the investment plans, costs, prices and profits, lists of customers and suppliers, as well as any aspect related to the personal or professional situation of any person, and / or operational or activity-related issues, including, contracts, correspondence, access keys, passwords and similar, trade secrets and information on property rights intellectual, such as, but not limited to, drawings, models, software, formulas, data, inventions, methods of technical installation, processes, marketing forecasts, production methods, analyzes and / or operational and commercial calculations relating to the Client, and / or its Clients, suppliers, consultants and employees, even if such Information is not expressly marked as "confidential" or "confidential".

The supplier undertakes:

- to maintain the utmost confidentiality regarding the Information and in this regard undertakes to respect the obligations of confidentiality;

- not to disclose, provide, make known to anyone or make any unauthorized use of any information and to not directly or indirectly allow third parties access, use, disclosure, communication, copying, reproduction or the conservation in any form and by any means, of any information;
- to the termination of the employment relationship, to return to the Employer all materials that contain information, including, without limitation, what has been delivered or otherwise acquired, regardless of the manner of such acquisition, and to destroy and / or delete any file electronic / document that can not be returned. It also specifies that everything related to the account and the contents of the e-mail will be acquired during the termination of the employment relationship;
- not to disclose by any means, news or comments concerning the activities entrusted or the organization of them, not to do, in any way, acts prejudicial to the COMPANY and, in general, not to harm in any way the image of the same;
- to fully apply the data protection regulations, for all the information relating to the COMPANY collected and processed in the execution of the contractual relationship.

**CONSENT**

The supplier expresses its consent to the processing of data concerning him or otherwise of any data supplied, for the purposes and according to the methods indicated above, with the delivery of the data to the COMPANY.

**Signature of the Processing Holder:****Lorena Bentivoglio**