

	Disclosure for the processing of personal data for suppliers pursuant to articles 13 and 14 of (EU) Reg. 2016/679 “GDPR”	ModP-01-05
		Rif.
		Rev.0 – Giu.2018

This privacy policy document describes the purposes and modalities of processing personal data of S.P.D. S.p.A. (hereafter "S.P.D.") suppliers (hereafter "Data Subjects")

a) The Data Controller of personal data

The Data Controller is **S.P.D. S.p.A.** Registered Office: Registered and operating, office, Warehouse: Via G. Galilei, 2/4 24043 Caravaggio (BG) ITALY - Production plant: Via Enrico Fermi, 28/30 Caravaggio (BG) - Production plant: Via Leonardo Da Vinci, 136/138 Caravaggio (BG) - Tel. 0363 546511 - Fax 0363 52578 - Vat No./Tax Code 00382960169 - E-mail info@spd.it - Certified E-mail address amministrazione.spd@arubapec.it - Website: www.spd.it.

b) Data Protection Officer

S.P.D. pursuant to art. 37 of (EU) Reg. 2016/679, has decided not to appoint a Data Protection Officer (DPO) as it is not a public body and does not carry out regular and systematic large-scale monitoring of data as a main activity, including data referred to in articles 9 and 10.

c) Purpose, modalities and place of processing

S.P.D. collects and processes personal data of the Data subjects to put in place their activities and business, to make available information, products and services that may be of interest, including the conduct of activities related to the necessary operations and pre-contractual and contractual obligations and the performance of market analysis, commercial activities and promotional initiatives for data subjects.

The data will be processed:

1. For purposes related to the contract between the parties (purchase of goods and services)
2. For purposes of an administrative, statutory, fiscal and accounting nature;

Personal data are processed using automated and manual tools for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are complied with to prevent data loss, illicit or incorrect use and unauthorised access.

The processing connected to the Services takes place at the aforementioned offices of S.P.D. and is only handled by technical personnel specifically appointed as the Data Processor and/or the person in charge of the processing.

d) Categories of personal data and recipients, scope of communication and dissemination

S.P.D. collects the personal data of the Data subject necessary for the provision of the Services, including but not limited to: company name, telephone number, e-mail address and tax code, VAT number, etc.

S.P.D. does not request sensitive data and the same will not be disseminated.

The data may be disclosed:

- to Public Administrations, for the performance of institutional functions
- to accountants
- to Lawyers for legal assistance in case of disputes concerning the contract;
- to consultancy companies, professionals and organisations that work for the company in the various sectors;
- to banking institutions
- inspection and control bodies;

These persons will process the data in their capacity as independent Data Controllers.

e) Nature of providing data and consequences of refusing to answer

The provision of data for the purposes referred to in article c) is mandatory. In its absence, we will not be able to guarantee the Services stipulated by the contract.

f) Transfer abroad

The data will not be transferred in any way abroad.

g) Period of storage

Personal data processed for pre-contractual/contractual purposes are processed for the time strictly necessary to achieve the purposes for which they were collected and may be stored for a period of 10 (ten) years in order to manage and fulfil the requests of the competent authorities, handle any legal and/or out-of-court disputes, and manage and respond to any claims for damages.

h) Rights of the data subject

In your capacity as the data subject, you shall have the rights referred to in art. 15 GDPR and precisely the rights to:

- I. obtain confirmation as to whether or not personal data concerning you exist, regardless of their being already recorded, and communication of such data in intelligible form;
- II. obtain specification:
 - a) of the source of the personal data; b) of the purposes and modalities of the processing; c) of the logic applied to the processing, if the latter is carried out with the help of electronic means;
 - d) of the identification data concerning the Data Controller, Data Processors and the designated representative pursuant to art. 3, paragraph 1 of the GDPR; e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing; obtain:
- III.
 - a) the update, rectification or, where interested therein, integration of the data; b) the erasure, anonymisation or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed; c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected.
- IV. object, in whole or in part:
 - a) on legitimate grounds, to the processing of personal data concerning you even though they are relevant to the purpose of the collection; b) to the processing of personal data concerning you, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys through the use of automated call systems without the intervention of an operator by e-mail and/or through traditional marketing methods by telephone and/or post.
- V. It should be noted that the right of objection of the data subject, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the data subject to exercise the right to object even only partially. Therefore, the data subject may decide to receive only communication using traditional methods or only automated communication or none of the two types of communication. Where applicable, you also have the rights referred to in articles 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of processing, right to data portability, right of objection), as well as the right to lodge a complaint with the Authority.

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i) Mechanism to exercise rights

The requests are addressed to the Data Controller or Data Processor without specific procedure, by sending a communication to the e-mail: accounting@spd.it

j) Right to complain

The Data subject is entitled to submit a complaint to the Personal Data Protection Authority to complain about a possible breach of the personal data protection regulations and to request checking by the Italian Authority for the Protection of Personal Data located in Piazza Venezia n. 11 - 00187 Roma - Switchboard: (+39) 06.696771 - Fax: (+39) 06.69677.3785 - E-mail: protocollo@gpdp.it - Certified E-mail address: protocollo@pec.gpdp.it.

k) Data source

The data in question were acquired mainly from the data subject. However, some of them may be acquired from publicly accessible sources.