

MODEL OF PRIVACY POLICY NOTICE FOR PROCESSING SUPPLIERS' PERSONAL DATA

Dear Sir/Madam,

we need to process information about you and your personal data for the purposes indicated below. We are, therefore, providing you with the following information, as prescribed by the European legislation on the protection of personal data (EU Regulation 679/2016).

1. Data Controller

The Data Controller, i.e. the party entitled to take decisions regarding the purposes, procedures and security of personal data is EMU GROUP S.P.A. with registered office in Zona Industriale Schiavo, 06055 Marsciano (PG).

2. Purposes and legal base of the processing

The personal data you give us, which may be collected when you provide your services, will be processed for the purposes according to the legal base given below:

<p>PURPOSES</p> <p><i>(Why we process your data)</i></p>	<p>LEGAL BASE</p> <p><i>(the legal provision which regulates our processing)</i></p>	<p>REFUSAL OF PROCESSING</p> <p><i>(What happens if you refuse to provide your data and/or your consent to processing)</i></p>
<p>To effectively manage all the contractual aspects of your relationship with us</p>	<p>Art. 6 letter b), processing is required to execute a contract with the data subject or to execute pre-contractual provisions taken at the latter's request.</p>	<p>Consent is not required. If you refuse to provide your data, we will be unable to go ahead with the contract</p>
<p>To fulfil legal obligations regarding fiscal and tax administration</p>	<p>Art. 6 letter c), processing is required to fulfil a legal obligation to which the data controller is subject.</p>	<p>Consent is not required. If you refuse to provide your data, we will be unable to go ahead with the contract</p>
<p>To exercise or defend a right in court (contractual non-performance, notices, transactions, credit collection, arbitrations, judicial disputes)</p>	<p>6, letter f), processing is required to fulfil the lawful interest of the data controller or third parties, on condition that the interests or rights and basic freedom of the data subject requesting protection of personal data prevail, especially if the data subject is under age.</p>	<p>Consent is not required. If you refuse to provide your data, we will be unable to go ahead with the contract</p>

3. Recipients and categories of processed data

The personal data you have provided or which is acquired during the provision of your services will be processed exclusively by personnel authorised for the purpose or by data protection officers appointed for the purpose.

In addition to persons qualified by law, your data may be communicated exclusively to those persons you authorise. The data categories and recipients will be as follows:

PURPOSES	CATEGORIES OF DATA	RECIPIENTS
Tax accounting obligations	Identification, contractual details	Companies and professionals in the tax accounting sector
Shipment of goods	Identification, contractual details	Shipping and delivery companies
Collection of invoices	Identification, contractual details	Banks
Protection in the event of non-fulfilment of the contract	Identification, contractual details	Companies and professionals appointed to collect credit and deal with any litigation
Maintenance of the electronic system	Identification, contractual details	Maintenance workers on the electronic system
To execute the contract	Identification, contractual details	Other companies of the Emu Group, parent companies, subsidiaries and affiliated companies

4. Transfer abroad

Your personal data will not be transferred outside the European Union.

5. Period of personal data retention and criteria used

The personal data processed is collected in documents, which will be retained in compliance with the purpose of the processing, as summarised below.

DOCUMENT	RETENTION DURATION
Contract	10 years from the termination of the contract

Tax documentation regarding the contract.	10 years from the time of issue
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6. Rights of the data subject

The Regulation gives you the following rights, which you can exercise when dealing with and against each co-data controller

A complete extract of the articles of law which follow is annexed to this document.

- Right of access: Article 15 of the European Regulation allows you to obtain the Data Controller's confirmation of whether or not your data is currently being processed and, in that case, to obtain access to that data.
- Right to rectify: Article 16 of the European Regulation allows you to ask the Data Controller to rectify any incorrect personal data without any unjustifiable delay. Taking into account the purposes of the processing, the data subject has the right to supplement any incomplete personal data and provide a supplementary declaration.
- Right to erasure: Article 17 of the European Regulation allows you to obtain the erasure of your personal data without any unjustifiable delay, if any of the grounds envisaged by the regulations exist.
- Right of restriction: Article 18 of the European Regulation allows you to ask the Data Controller to restrict processing when any of the grounds envisaged by the regulations exist.
- Right of opposition: Article 21 of the European Regulation allows you to oppose at any time the processing of your personal data on the grounds of your particular situation, pursuant to Article 6, paragraph 1, letters e) or f). This includes profiling on the basis of those provisions.
- Right of portability: Article 20 of the European Regulation allows you to receive your personal data you have sent to a data controller in a structured, commonly used format, which can be read by an automatic device. You have the right to send that data to another data controller without any impediment by the data controller you gave them to initially, according to the terms and conditions envisaged by the regulation.
- Right to lodge a claim: Article 77 of the European Regulation gives you the right to lodge a claim with a supervisory authority in the member state where you usually reside, work or the place where the presumed breach has occurred, if you believe the processing of your data has breached the regulation.

7. Further information

Further information, our privacy policy and this notice are available on our website at the address www.emu.it

A complete extract of the aforementioned articles of law is available at the Administrative Department of the Company EMU GROUP SPA – Zona industriale – 06055 Marsciano (Perugia) – Italy – 0039 075 874021 – info@emu.it

This department will be able to provide all the explanations you may need on exercising your rights; you may send your requests in writing, together with a valid identity document to EMU GROUP SPA – Zona industriale – 06055 Marsciano (Perugia) – Italy – 0039 075 874021 – info@emu.it

8. Collaboration

We consider the protection of your data and compliance with the principles established by legislation, especially the principle of transparency to be of primary importance. We would be grateful, if you would notify the data controller's contacts given above of anything you fail to understand in this document and suggest any improvements we can make.

PLACE, 15 October 2018



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Signature

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