

# Supplier privacy policy

**Under art. 13 of EU Regulation no. 2016/679 (GDPR),** in the interests of transparency, we provide the following information to inform FRIULAIR S.r.l. Suppliers about our data processing methods.

### a) Data Controller identity and contact details

We inform you that your data will be processed by FRIULAIR S.r.I. as Data Controller. The Data Controller can be contacted at the following email address: <a href="mailto:privacy@friulair.com">privacy@friulair.com</a> and at its registered office in via Cisis,36 - 33052 Cervignano del Friuli (UD).

#### b) Processing purposes, legal basis and legitimate interest

Personal Data is processed for the following purposes:

- 1. fulfilling obligations arising from the service contract to which the Supplier is a party;
- 2. managing suppliers, contracts, orders and invoices;
- 3. managing any disputes arising from contractual liability;
- 4. fulfilling legal obligations related to civil, tax and accounting provisions.

The processing basis for the purposes referred to in points 1 and 2, is to complete the contract and the processing necessary for its performance and pre-contractual measures (art. 6 no. 1 letter B - GDPR).

Processing for the purposes set out in point 3 is necessary to pursuit the Data Controller's legitimate interest to enforce contractual obligations entered into with the Supplier and exercise the right of defence (art.6 no. 1 letter f - GDPR); the legal basis for the purposes set out in point 4 is the need to fulfil legal obligations (art.6 no. 1 letter c - GDPR).

## c) Personal data recipients and any categories of recipients

Data is processed by those authorised under the responsibility of the Data Controller for the above purposes using manual and electronic tools, with organisational and processing logics that are strictly related to the objectives.

Data may be sent to third parties who provide instrumental services such as legal, tax and commercial consulting companies, technical computer services, communication and email services, commercial agents, banks and credit institutions. In addition, an updated list of all recipients and any external data processors is available at the Data Controller's offices.

#### d) Transfer of data to third countries

The Data Controller will not transfer the data to a third country or international organisation.

#### e) Data retention period

Data is kept in paper or electronic format for the period necessary to achieve the purposes for which it was collected and under legal obligations.

### f) Data rights

The Supplier has personal data access rights, if requirements are met, under Article 15 of EU Regulation 2016/679 and the rights provided for in Articles 16, 17, 18, 21 of EU Regulation 2016/679 to rectify, erase, limit processing and the right to object under Art. 12 of the EU Regulation 2016/679.

The data subject may exercise their rights by submitting a request by written communication to the email address: <a href="mailto:privacy@friulair.com">privacy@friulair.com</a>. The data protection rights form is available on the following website: <a href="https://www.garanteprivacy.it/HOME/MODULISTICA-E-SERVIZI-ONLINE">https://www.garanteprivacy.it/HOME/MODULISTICA-E-SERVIZI-ONLINE</a>.



# g) Complaint

If you believe that your personal data processing is violating the provisions of EU Regulation 2016/679, you have the right to complain to the Data Protection Authority (Garante Privacy).

### h) Provision of Data

We inform you that the communication of personal data for the purposes referred to in point b) is a legal or contractual obligation or a necessary requirement for the contract completion. Any refusal to provide certain data may make it impossible to perform the contract to which the Supplier is a party.

Cervignano del Friuli, 11/10/2021

Legal Representative