

PERSONAL DATA PROCESSING POLICY
pursuant to Article 13 of EU Regulation

Data Controller. The Data Controller is FRASCOLD S.p.A. - Via Barbara Melzi 105 – 20027 Rescaldina (Mi), Tel. +39 0331 742201 - e-mail: frascold@frascold.it

Categories of Data Subjects and processed personal data The Data Controller may process personal data on the following subjects:

- (i) Suppliers and potential suppliers who are natural persons;
- (ii) natural persons acting in the name and/or on behalf of suppliers and potential suppliers (including, by way of example, pro tempore legal representative, agents, spokespersons, etc.); (hereinafter referred to collectively as “**Data Subjects**” and individually as “**Data Subject**”).

Depending on the Data Subjects, processing may involve the following common personal data: personal details, operating headquarters location, contact details including electronic ones, tax code, VAT No, accounting details, bank details as well as any other personal data of subjects who carry out specific jobs within Your organisation [Technical Manager, Quality Manager, Production Manager, etc] (hereinafter, referred to as “**Personal Data**”).

Purposes and legal grounds for the processing. The Data Controller shall process Personal Data for the purposes and legal grounds as shown in the following table

Purposes of the processing	Legal grounds for the processing
To carry out pre-contractual activities – management and fulfilment of the contract and therefore of the subsequent business relationship, to provide Services (and the relative assistance), to fulfil any connected administrative, accounting and organisational/ management obligations (including compiling lists of personal details, managing orders, carrying out Services and payments, sending service communications, for example, the planning of deliveries or on any potential amendments and, more generally, on any relative practical aspects, etc)	to fulfil a contract or pre-contractual measures (Article 6(c) GDPR)
To send communications on similar products or services to those provided in the contract;	the legitimate interest of the Data Controller (Article 6(f) GDPR)
To comply with legal obligations (eg. tax provisions; obligations connected to accounting administrative activities)	to comply with a legal obligation (Article 6(c) GDPR)
To exercise or defend a right connected to the contractual relationship out of or in a court of law.	to exercise a right of the Data Controller/legitimate interest of the Data Controller (Article 6(f) GDPR)
To conduct an assessment (if already a supplier) or a prior check (if not yet a supplier) through special questionnaires	The legitimate interest of the Data Controller to carry out regular checks on the reliability of suppliers already in operation or of potential new suppliers.

Nature of the provision of data. Personal Data needs to be provided to fulfil the aforementioned purposes, therefore if this data is not provided - even partially - it shall not be possible to carry out the activities requested by Data Subjects, to establish a contractual relationship and to comply with any obligations connected to the operational, economic and administrative performance of the Services.

Personal data retention period. Personal data shall be stored for the period of time strictly required to fulfil the purposes for which it was collected. In accordance with legal obligations, it shall be stored for the period of time provided for by these legal obligations. Any data processed to exercise one of the Data Controller's rights shall be stored for the relevant limitation period conservatively increased by 6 months to guarantee the Data Controller's right of defence. Any data processed to carry out an assessment: **if already a supplier**, for the entire duration of the business relationship or the provision of Services or anyway for the time required to carry out any additional activities/services for the Data Controller and, in any case, for a period of no longer than 10 years after the termination of the product and/or service supply relationship; **if a potential supplier**, for a maximum of 12 months.

Recipients of personal data. For the aforementioned purposes and in accordance with the principles of necessity, relevance and proportionality, people authorised to process data by the Data Controller (employees and partners) may come across Your Personal Data. Furthermore, the Data Controller might disclose it to:

- External subjects to fulfil legal obligations;
- Government administration and public and private bodies, including following inspections or checks;
- External subjects who work in the company process and which the Data Controller uses to carry out certain management phases as part of the company business carried out (tax, accounting, financial, insurance or legal obligations);
- Banks for handling receipts and payments.

Any processed data shall not be disclosed to additional third parties.

If necessary, these recipients shall operate as data processors. The updated list of potential

External Data Processors is available by contacting the Data Controller.

Processing methods. Personal Data is processed both through automated or electronic processors and means and with manual methods and paper copies. All the means used for the processing are adequate to guarantee the security and confidentiality of the Personal Data and shall only be used by duly authorised and properly trained individuals.

Transferring data to Third Countries. Personal Data is not normally transferred to Third Countries.

If it is necessary to fulfil the aforementioned purposes, Personal Data shall be transferred in accordance with existing legal provisions and with appropriate safeguards.

Data subject rights. If conditions are met, data subjects have the right to exercise the rights provided for by Articles 13 et seq of the GDPR. In particular, data subjects may request:

- Access to their Personal Data (and/or a copy of this Personal Data), as well as additional information on the current processing of this data;
- that their Personal Data is corrected or updated;

- that their Personal Data is deleted from any databases;
- that the processing of their Personal Data is restricted;
- Data portability, i.e. the right to obtain a copy of their Personal Data in a structured and commonly used format which is legible on an electronic device or to request that their data is sent to another Data Controller;

Data subjects also have the right: to object to the processing of their personal data; to with-draw their consent to processing at any time, where required; to file a complaint pursuant to Article 77 of the GDPR with the competent Authority.

Data Controller contact details. The Data Controller may be contacted by:

- E-Mail: frascold@frascold.it
- Ordinary post: - Via Barbara Melzi 105 – 20027 Rescaldina (Mi)

Policy updated on 01/10/2024