








DOCUMENT ON THE PROCESSING OF PERSONAL DATA					
CONTROLLER AND CONTACT DETAILS 	Phoenix Technology S.r.l. privacy@photec.it Via Molino Rosso 9/C - 40026 Imola (BO)				
DATA PROTECTION OFFICER AND CONTACT DETAILS 	SGS Italia S.p.A. ssc@sgsitalia.postecert.it Via Caldera 21 - 20153 Milan, Italy				
CATEGORIES AND TYPES OF DATA COLLECTED AND PROCESSED 	<table border="0"> <tr> <td style="vertical-align: top;"> For most of our services: </td> <td> <ul style="list-style-type: none"> ▪ contact information (name, personal and/or office address, telephone, e-mail addresses); and ▪ financial information (tax code and information pertaining to current account operations). </td> </tr> <tr> <td style="vertical-align: top;"> For some of our services: </td> <td> <ul style="list-style-type: none"> ▪ Identifying information (e.g., date of birth, nationality, photographs, IP addresses and passwords); ▪ Professional and business information (training and work experience); and ▪ further data required to manage our business relationship in compliance with the specific applicable contractual terms or the General Contract Conditions. </td> </tr> </table>	For most of our services:	<ul style="list-style-type: none"> ▪ contact information (name, personal and/or office address, telephone, e-mail addresses); and ▪ financial information (tax code and information pertaining to current account operations). 	For some of our services:	<ul style="list-style-type: none"> ▪ Identifying information (e.g., date of birth, nationality, photographs, IP addresses and passwords); ▪ Professional and business information (training and work experience); and ▪ further data required to manage our business relationship in compliance with the specific applicable contractual terms or the General Contract Conditions.
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LEGAL BASIS FOR PROCESSING PROCESSING PURPOSES NATURE OF THE PROVISION OF DATA 	<table border="0"> <tr> <td style="vertical-align: top;"> FOR THE FULFILMENT OF CONTRACTUAL OBLIGATIONS (Art. 6.1.B of the GDPR) </td> <td> Personal data relating to its suppliers are processed by Phoenix Technology S.r.l. for contractual needs and for the management of commercial relations with them and ensure the appropriate execution of services, for example by meeting requests from the Supplier and receiving invoices or making payments. The purposes of data processing comply first and foremost with the specific product or service purchased. Suppliers can find further information about the purposes of data processing in the relevant documents, conditions and contractual terms. </td> </tr> <tr> <td style="vertical-align: top;"> IN THE CONTEXT OF LEGITIMATE INTERESTS (Art. 6.1.F of the GDPR) </td> <td> Without unduly affecting the interests of confidentiality or the fundamental rights and freedoms of data subjects, the company processes the data, beyond the specific performance of the contract, to satisfy its legitimate interests, pursued by the company directly or by third parties. Such legitimate interests include: <ul style="list-style-type: none"> - helping the company to get to know its own suppliers better, the products and services the latter produce and other products and services which they could provide; - assessing potential actions in legal disputes; - ensuring the safety of the company's environment and IT infrastructure; </td> </tr> </table>	FOR THE FULFILMENT OF CONTRACTUAL OBLIGATIONS (Art. 6.1.B of the GDPR) 	Personal data relating to its suppliers are processed by Phoenix Technology S.r.l. for contractual needs and for the management of commercial relations with them and ensure the appropriate execution of services, for example by meeting requests from the Supplier and receiving invoices or making payments. The purposes of data processing comply first and foremost with the specific product or service purchased. Suppliers can find further information about the purposes of data processing in the relevant documents, conditions and contractual terms.	IN THE CONTEXT OF LEGITIMATE INTERESTS (Art. 6.1.F of the GDPR) 	Without unduly affecting the interests of confidentiality or the fundamental rights and freedoms of data subjects, the company processes the data, beyond the specific performance of the contract, to satisfy its legitimate interests , pursued by the company directly or by third parties. Such legitimate interests include: <ul style="list-style-type: none"> - helping the company to get to know its own suppliers better, the products and services the latter produce and other products and services which they could provide; - assessing potential actions in legal disputes; - ensuring the safety of the company's environment and IT infrastructure;
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	<ul style="list-style-type: none"> - Controlling the quality of products and services purchased; and - risk management and compliance.
<p>AS A RESULT OF ANY CONSENT GIVEN (Art. 6.1.A of the GDPR)</p> 	<p>In the event that an interested party has given the Company consent to process the Data for certain purposes (for example for marketing purposes), such processing is lawful based on the consent given. Consent is always optional and can be revoked at any time. This also applies to revocation declarations of consent given to the Company before the GDPR became applicable, i.e. before 25 May 2018. For the avoidance of doubt, the withdrawal of consent does not affect the lawfulness of the processing of Data prior to the revocation itself.</p>
<p>ON THE BASIS OF LEGAL OBLIGATIONS (Art. 6.1.C of the GDPR)</p> 	<p>The company is subject to several legal obligations, i.e., regulatory and legal requirements. The purposes of processing include the fulfilment of control and communication obligations pursuant to current legislation.</p>
<p>WHO HAS ACCESS TO THE DATA AND WITH WHOM WILL THE DATA BE SHARED?</p> 	<p>Le altre affiliate del Gruppo GPA hanno accesso ai Dati per adempiere alle obbligazioni contrattuali sorte con i Fornitori e per assicurare un coerente standard di qualità all'interno del gruppo. Le affiliate del Gruppo GPA agiranno quali responsabili del trattamento nominati ai sensi dell'art. 28 GDPR o quali autonomi titolari del trattamento, secondo le circostanze e finalità.</p> <p>The Data may be transmitted to third parties who need to carry out specific activities in relation to the Data, in accordance with the purposes of the processing or to service providers to the Company, such as IT and hosting service providers and subcontractors. When Phoenix Technology S.r.l. carries out these activities and takes action to ensure that they comply with its data security standards, so that the Data remains secure.</p> <p>The Data may also be transmitted to authorities, entities, customers of the company and/or subjects to whom they must be communicated, pursuant to binding legal or contractual provisions. These authorities, entities, customers and/or subjects will act as independent controllers.</p> <p>The Data may also be consulted by thirdparty members, when Phoenix Technology S.r.l. Suppose you sell or transfer part or all of your assets. In this case, the Company will take all contractual measures to ensure that the Company's security standards are respected, so that the Data remains secure.</p>
<p>INTERNATIONAL TRANSFER OF DATA</p> 	<p>The company only transfers data across national borders inside and outside the EEA when:</p> <ul style="list-style-type: none"> it is justified for business purposes; and safeguards have been implemented to ensure that the data continues to be protected at least with the same level of protection as required in the jurisdiction of origin. To ensure this level of protection for personal data of the Supplier, Phoenix Technology S.r.l. may enter into a data transfer agreement with the receiving third party based on the standard contractual clauses approved by the European Commission, or ensure that the transfer is to a

		<p>jurisdiction subject to an adequacy decision by the European Commission.</p> <p>Any transfer of data to international organisations and/or non-EEA countries will take place in accordance with one of the methods permitted by current legislation.</p>
<p>HOW ARE YOUR DATA PROTECTED?</p> 	<p>The company implements appropriate organisational and technical measures to protect data against unauthorised, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing. These security measures have been implemented taking into account the state of the art of technology, their cost of implementation, the risks presented by the processing and the nature of the data, with particular attention to sensitive data. In particular, adequate awareness, confidentiality and training commitments are in place to ensure that data are not shared with or disclosed to unauthorised persons.</p>	
<p>HOW LONG WILL YOUR DATA BE STORED?</p> 	<p>Data will be stored on paper and/or electronically only for the time necessary for the purposes for which they were collected, respecting the principles of storage limitation and data minimisation defined in art. 5.1, letters c) and e) of the GDPR.</p> <p>The data will be kept to comply with regulatory obligations and pursue the aforementioned purposes, in accordance with the principles of necessity, minimisation and adequacy.</p> <p>The company may retain the data after the end of the contractual relationship to fulfil regulatory, contractual and/or tax obligations or in the event of legal action. Then, when the aforementioned reasons for processing cease, the data will be anonymised, erased or destroyed.</p>	
<p>RIGHTS OF THE DATA SUBJECTS</p> 	<p>Each Data Subject may exercise the following rights defined in Articles 15-22 GDPR by sending a written request to the Company to the aforementioned contact details.</p> <p>The interested party may also lodge a complaint with the Supervisory Authority, represented in Italy by the Guarantor for the Protection of Personal Data (www.garanteprivacy.it), if he considers that the processing is contrary to the legislation in force and judicial recourse if he considers his rights violated.</p>	<p>Access: the interested party can obtain information regarding the processing of his Data and a copy of the same.</p> <p>Cancellation: the interested party may request the cancellation of his Data, within the limits permitted by law.</p> <p>Opposition: the interested party may oppose the processing of Data, on the basis relating to his particular situation. In cases of opposition to the processing of Data pursuant to art. 21 GDPR, the Company reserves the right to evaluate the application, which will not be accepted if there are legitimate reasons to proceed with the processing that prevail over the freedoms and interests and rights of the Collaborator.</p> <p>Rectification: if the interested party considers that his Data are inaccurate or incomplete, he may request that they be modified accordingly.</p> <p>Restriction: the interested party may request the limitation of the processing of his data.</p> <p>Revocation of your consent: where the interested party has given consent to the processing of his Data, he can revoke it at any time.</p>





		Data portability: The interested party can receive, in a structured format, commonly used and readable, the personal data concerning him and has the right that such data, where requested, are transferred to another holder.
<p>The company undertakes to maintain good relations with its suppliers. If suppliers are not satisfied with the Company's business or considers that the processing of their data is contrary to current legislation, they can lodge a complaint with a supervisory authority pursuant to Art. 77 of the GDPR.</p> <p>Phoenix Technology S.r.l. undertakes to ensure that supplier data is always accurate and kept up to date. To this end, should any supplier data change, please notify us of the change as soon as possible.</p>		

