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PRIVACY POLICY
(IN ACCORDANCE WITH ARTICLES 13 AND 14 GDPR)

S.I.E. S.r.l., as Data Controller (hereinafter the "**Company**") informs you that your personal data (if you are a natural person or a company) and personal data of your partners, employees or assigns persons (hereinafter "**Data Subject**") communicated (hereinafter "**Personal Data**") will be processed for the negotiation and/or the performance of the business relationship between the Parties and for the related activities (hereinafter, the "**Contract**") and in accordance with this privacy notice.

ART 1.
DATA CONTROLLER

The Company, with registered office in Genova, Via delle Fabbriche n. 10 rosso, 16158 – (GE) is the owner of the processing in relation to the processing of Personal Data and it can be contacted at the following address: siesrl@pec.sie-srl.net.

The Company has made the appointment of a Data Controller where necessary in accordance with the current regulatory framework.

ART 2.
PERSONAL DATA COLLECTED

The Company collects and processes Personal Data of the Data Subject, such as:

1. identifying Personal Data (such as the name and surname, fiscal code);
2. contact information (such as the postal address, e-mail and telephone number)
3. data relating to the employment position of the Data Subjects, with particular reference to pay and tax data (by way of example, hours worked in execution of the work or service entrusted by the Company under the Contract for each employee, collaborator or agent and their remuneration); and
4. tax data, with particular reference to those relating to the declarations required by applicable legislation.

In any case, the aforementioned Personal Data will be processed only where strictly necessary for the achievement of the purposes referred to in Article 3 below.

ART 3.
PURPOSES OF THE PROCESSING

The Company processes Personal Data of the Data Subject through both manual and electronic means, for the following purposes:

1. carry out the negotiations and the execution of the Contract with the Customer/ Sub-supplier and the fulfilment of contractual and pre – contractual obligations arising from the relationship to which the Client/ Sub – supplier is a party ("**Contractual Purpose**");
2. for the fulfilment of the obligations deriving from the applicable legislation ("**Legal Purposes**").

ART 4.
NATURE AND LEGAL BASIS FOR THE TREATMENT

The provision of the Data and the processing thereof is obligatory for (i) Contractual Purposes insofar as it is necessary for the execution of the contract with the Customer/ Sub – supplier and for (ii) the Legal Purposes insofar as required by laws, regulations and EU legislation.


In case the Client/Sub – supplier does not want their Data to be processed for such purposes, it will not be possible for the Controller to enter into a con-contractual relationship with them

ART 5.
MODALITIES OF THE PROCESSING OF THE DATA

The Data shall be processed in paper, computerized and telematic form and included in the company's databases (such as, for example, customer/sub-supplier master data, administrative databases, etc.) by means of the operations of collection, registration, organization, structuring, storage, consultation, use, processing.

Furthermore, the Data shall be: (i) processed lawfully and fairly; (ii) collected and recorded for specific, explicit, legitimate purposes and in such a way as to ensure their confidentiality and security; (iii) relevant, complete and not exceeding the purposes for which they are collected or subsequently processed; (iv) kept for a period of time not exceeding that necessary for the purposes for which they were collected and processed.

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ART 6.
COMMUNICATION AND DISSEMINATION OF PERSONAL DATA

The Company may communicate for the above Purposes and to the extent strictly necessary for the performance of each type of Processing to one or more determined person belonging to the following categories:

- employees and/or collaborators of the Company belonging, by way of example, to the commercial area, technical assistance, production, administration, etc., within the scope of their respective duties and/or any contractual obligations inherent to the business relationship with the Customer/Sub-supplier, in their capacity as data processors;
- for the performance of activities connected with the execution of contracts with the Client/Sub-supplier, in their capacity as data processors (i) consultants or legal, administrative and tax firms;

The Data will not, under any circumstances, be disseminated by the Company.

ART 7.
DATA TRANSFER ABROAD

Data may be freely transferred outside the national territory to countries located in the European Union. In particular cases, Personal Data may also be transferred to countries outside the European Union where the Company has its offices (e.g. Swiss). In any case, any transfer of Data outside the EEA will be carried out in compliance with articles 45 and 46 of the GDPR, as well as any other measures required by the applicable data protection laws.

The Data Subject shall have the right to obtain information on the place where such Personal Data are stored by making a specific request to the Company at the address referred to in Article 1 of this privacy notice.

ART 8.
TERM OF RETENTION OF PERSONAL DATA

The Company will retain the Data for the period necessary to fulfil the Purposes for which the Data were collected pursuant to Article 3 above.

In any case, the following retention periods apply to the processing of Data for the Purposes set out below:

- the Data processed for the Contractual Purposes shall be retained for the entire duration of the contract and for 10 years after the expiry of the contract for the purpose of defending and/or asserting a right of the Company in and/or out of court in case of disputes related to the performance of the contract;
- Data processed for the Purposes of Law are kept for a period equal to the duration prescribed for each type of data by law;

ART 9.
RIGHTS OF THE INTERESTED PARTIES

In relation to the aforesaid data processing, the Data Subjects may, at any time and free of charge, (a) obtain confirmation of the existence or non-existence of Data concerning them and be informed thereof; (b) be informed of the source of the Data, the purposes of the processing and its methods, as well as the logic applied to the processing carried out by electronic means; (c) request the updating, rectification or - if they are interested - the integration of the Data (d) to obtain the deletion, transformation into anonymous form or blocking of any Data processed in breach of the law, as well as to object, for legitimate reasons, to the processing; (e) to object, in whole or in part, to the processing of Data concerning them for direct marketing purposes carried out through automated and/or traditional methods; (f) to revoke, at any time, their consent to the processing of Data, without prejudice to the lawfulness of the processing based on the consent given before the revocation.

In addition to the rights listed above, Data Subjects may, at any time within the limits of the Privacy Regulation, (a) request the restriction of the processing of personal data in the event that (i) they contest the accuracy of the Data, for the period necessary to verify the accuracy of such Data (ii) the processing is unlawful and the Customer/Sub-supplier objects to the deletion of the Data and requests instead that its use be restricted; (iii) although the Controller no longer needs the Data for processing purposes, the Data is necessary for the Data Subject to ascertain, exercise or defend a right in court; (iv) the Data Subjects have opted-in to the processing pursuant to Art. 21(1) of the Privacy Regulation pending verification as to whether the Company's legitimate reasons prevail over those of the data subject; (b) object at any time to the processing of Data; (c) request the deletion of Data concerning them without undue delay; (d) obtain the portability of Data concerning them; (e) lodge a complaint with the Data Protection Authority (www.garanteprivacy.it), if the conditions are met.

Should Data Subjects have any doubts or concerns regarding this privacy policy or wish to exercise their rights under this policy, they may contact the Company or the Data Controller at the addresses indicated above.

ART 10.
CHANGES AND UPDATES

The Company may at any time make amendments and/or additions to this information notice, also as a consequence of any subsequent amendments and/or additions to the Privacy Regulations. The amendments will in any case be notified in advance and may be made available on the communication channels of the Company or on the website managed by the same.

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