

SUPPLIER PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of Regulation (EU) 2016/679

This privacy notice is provided by NICKERSON ITALIA S.R.L. (represented by its legal representative pro tempore) as Data Controller, pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR"), in relation to the personal data collected from its suppliers. This notice aims to ensure transparency regarding the ways in which the company collects, uses, protects and manages personal data within the scope of its business and contractual activities. The data provided will be processed in full compliance with the principles of lawfulness, fairness, transparency and confidentiality, with the purpose of managing contractual relationships, fulfilling legal obligations and improving operational efficiency.

DEFINITIONS

Personal Data: Any information relating to an identified or identifiable natural person. A person is considered identifiable if they can be recognized, directly or indirectly, by reference to elements such as name, identification number, location data, online identifier, or one or more factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity.

Data Subjects: Natural persons to whom the personal data subject to processing refers. In practice, these are the individuals whose data are collected and processed.

Data Controller: The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. The controller is responsible for ensuring GDPR compliance and for adopting appropriate security measures.

Data Processor: A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller, following the controller's instructions and acting under a contract or other legal act.

Authorized Persons: Individuals who are authorized by the controller or processor to carry out data processing operations. These individuals act under the direct authority of the controller and must comply with the given instructions and security measures.

Purpose of Processing: The specific objectives for which personal data are collected and processed. The purposes must be determined, explicit and legitimate, and the processing must be limited to what is necessary to achieve them.

Legal Basis for Processing: The legal grounds justifying the processing of personal data by the controller. These may include the data subject's explicit consent, performance of a contract, compliance with legal obligations, protection of vital interests, performance of a task carried out in the public interest, or the legitimate interest of the controller or a third party.

DATA CONTROLLER

The Data Controller is NICKERSON ITALIA S.R.L., with registered office in Piazza Pontida 28 – 24122 – Bergamo (BG), Tax Code and VAT no. 03190630164.

CATEGORIES OF PERSONAL DATA PROCESSED

- Identification and contact data: first and last name; tax code and/or VAT number; address of residence/domicile or registered office; phone number and email address; any other contact data provided for the management of the business relationship;
- Tax, administrative and accounting data: bank details for payments and collections (e.g., IBAN); data relating to invoices, credit notes, purchase orders; delivery notes and logistical information; records of economic transactions;
- Contractual and transactional data: details relating to contracts, quotations and commercial offers; communications relating to orders, deliveries and performance management; correspondence exchanges related to contract execution;
- Logistics and operational management data: data relating to transport, shipments and receipt of goods;

- Correspondence and communication data: information provided through emails, certified emails (PEC), phone calls or other communication channels; any requests or reports submitted by the supplier.

It should be noted that the personal data processed refer both to individuals in the strict sense and to individuals acting on behalf of or representing legal entities (e.g., owners, employees, collaborators, etc.).

PURPOSE OF THE PROCESSING AND LEGAL BASIS

The personal data of suppliers are processed for the following purposes:

1. Management of the commercial and contractual relationship

- Inclusion in company registries and IT databases
- Management and negotiation of quotations and offers
- Issuance and receipt of orders, contracts and accounting documents

Legal basis: performance of a contract or pre-contractual measures (Art. 6, para. 1, letter b of the GDPR)

2. Fulfilment of tax, administrative and accounting obligations

- Issuance and management of invoices, credit notes and delivery notes
- Management of collections and payments
- Document archiving in compliance with current regulations
- Verification of compliance with legal requirements (e.g. DURC, certifications, etc.)

Legal basis: legal obligation (Art. 6, para. 1, letter c of the GDPR)

3. Management of correspondence and operational communications

- Exchange of information with the supplier for the organization and execution of the contract
- Coordination of logistical activities, shipments and receipt of goods

Legal basis: performance of a contract or pre-contractual measures (Art. 6, para. 1, letter b of the GDPR)

4. Protection of company rights and management of disputes

- Management of any contractual breaches
- Exercise or defense of a right in judicial or extrajudicial proceedings

Legal basis: legitimate interest of the Data Controller (Art. 6, para. 1, letter f of the GDPR)

The Data Controller ensures that the data are processed in a way that guarantees adequate security, including protection through appropriate technical and organizational measures, from unauthorized or unlawful processing and from accidental loss, destruction or damage (pursuant to Art. 5, para. 1, letter f “integrity and confidentiality”). Furthermore, all personal data will be processed in full compliance with the principle of data minimization, as set out in Article 5, para. 1, letter c of the GDPR, and will not be disseminated.

DATA PROCESSING METHODS

The processing of personal data is carried out, under the authority of the Data Controller, by persons specifically appointed, authorized and instructed to process the data pursuant to Article 29 of the GDPR, using IT and/or paper-based tools, in ways strictly related to the purposes and, in any case, such as to ensure the confidentiality and security of personal data pursuant to Article 32 of the GDPR. The processing of personal data may also be carried out, on behalf of the Data Controller, by Data Processors specifically appointed pursuant to Article 28 of the Regulation. The updated list of internal processors and external subjects appointed as Data Processors is kept at the registered office of the Data Controller and will be made available immediately upon express request.

Pursuant to Article 5 of the GDPR, your personal data will be:

- processed lawfully, fairly and in a transparent manner in relation to the Data Subject;
- collected and recorded for specific, explicit and legitimate purposes, and subsequently processed in a way compatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- processed in a manner that ensures appropriate security;
- kept in a form that permits identification of the Data Subject for no longer than is necessary for the purposes for which the personal data are processed.

DISCLOSURE OF PERSONAL DATA

The personal data collected for the purposes indicated above may be disclosed, within the limits of their specific responsibilities, to public and private entities for the correct execution of the contractual relationship or to comply with justified requests from Authorities, laws, regulations and/or EU legislation. By way of example, but not limited to, your personal data may be disclosed to the following categories of recipients:

- the Tax Administration and other public Authorities or Entities, where required by law or upon their request;
- credit institutions and banks for payment instructions or other financial activities instrumental to the execution of the Contract;
- the Revenue Agency (Agenzia delle Entrate);
- postal services, shipping companies and couriers for sending documentation and/or materials;
- specialized companies or law firms for debt collection and/or to protect their interests/rights.

The above-mentioned subjects, to whom the personal data of the Data Subject may be disclosed, will process the data as independent Data Controllers, as they are unrelated to the original processing carried out by the Controller. In any case, the personal data of the Data Subject will not be disseminated by the Data Controller.

TRANSFER OF DATA ABROAD

The processing of personal data takes place within the territory of the European Union, thus ensuring a level of protection in accordance with applicable regulations. If the company uses providers or data processors that operate tools or services (such as servers or cloud platforms) located outside the EU, the Data Controller undertakes to verify that such transfers take place in full compliance with Articles 44 et seq. of Regulation (EU) 2016/679 (GDPR).

DATA RETENTION

Personal data will be retained for the time strictly necessary to achieve the purposes for which they were collected and processed, and in any case for a period not exceeding the terms established by law, in accordance with the so-called "data minimization principle" set out in Regulation (EU) 2016/679 (GDPR). Specifically, tax and accounting documents will be retained for 10 years from the termination of the relationship (pursuant to Article 2220 of the Italian Civil Code).

RIGHTS OF THE DATA SUBJECT

Data Subjects may exercise the rights provided for in Articles 15–22 of the GDPR, in particular:

- the right to access personal data, as provided by Art. 15 of the GDPR;
- the right to rectify or complete personal data held by the Company considered inaccurate, as provided by Art. 16 of the GDPR;
- the right to erase personal data for which the Company no longer has any legal basis for processing, as provided by Art. 17 of the GDPR;
- the right to restrict how the Company processes personal data, if one of the conditions provided by Art. 18 of the GDPR is met;

- the right to receive a copy of the personal data provided to the Company, in a structured, commonly used and machine-readable format, as well as the right to transmit such personal data to another Data Controller (so-called portability), as provided by Art. 20 of the GDPR;
- the right to object at any time, for reasons related to your particular situation, to the processing of personal data for the pursuit of the Company's legitimate interest, as provided by Art. 21 of the GDPR;
- the right not to be subject to automated decision-making, including profiling, as provided by Art. 22 of the GDPR.

The Data Subject may exercise these rights at any time by sending an email with the subject "privacy rights" to the address **info@nickerson.it** or via certified email (PEC) to **admin@pec.nickerson.it**.

If you believe that the processing of your personal data by the Controller is in violation of the Regulation and/or applicable law, you may file a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) according to the procedures described on the website www.garanteprivacy.it, without prejudice to your right to lodge a complaint with any other administrative and/or judicial authority.

CHANGES

This privacy notice may be subject to changes, also due to legislative updates. Where necessary, the Data Controller will inform the data subject of any changes made.