

Information on the processing of Suppliers' personal data pursuant to art. 13 and following of EU Regulation 2016/679 ("GDPR")

With this information, Molaro Pezzetta Romanelli Del Fabbro & Partners (the Firm), as Data Controller (the Owner) in the persons of its associates, informs you of the methods for processing personal data. The registered office of the Firm is in Piazza della Repubblica 3, 33100, Udine.

The Firm appointed the DPO, identifiable with the company HEIKO S.R.L., in the person representing Di Benedetto Francesca.

1. Categories of data processed

The Firm may process, as appropriate, the following data relating to you and / or the reference staff (employees or collaborators) and / or to the shareholders and / or directors and / or auditors and / or statutory auditors and / or to the customers and / or suppliers of the Company it represents and / or the Companies controlled by it or associated with or in any case belonging to the Group (the Personal Data) to whom it is required to communicate this information:

- a. personal data (name, surname, place and date of birth, address, etc.);
- b. contact details of the staff members of the company or of the other subjects listed above who have exchanges of communications with the Data Controller (telephone number, e-mail, etc.);
- c. any other data connected with the execution of the assignment;
- f. any other data connected with the conduct of events that the Firm organizes or in which it participates (including images and videos).

2. Purpose of the treatment

Personal data will be processed for the following purposes:

- 1. fulfill the contractual obligations deriving from the contract of which you or the company you represent or for which you work is a party;
- 2. comply with the provisions of laws and regulations (national or community, such as the requirements required by the anti-money laundering and anti-terrorism legislation), or execute an order from a judicial Authority and Supervisory Bodies to which the Data Controller is subject;
- 3. exercise the rights of the Data Controller, in particular that of defense in court in the event of any disputes;
- 4. fulfill tax and accounting obligations;
- 5. pursue the legitimate interest of the Data Controller or third parties;
- 6. with exclusive reference to the data referred to in letters a., B. and f. of point 1., for sending communications related to the organization of events, meetings, conferences and seminars, also aimed at professional training or carrying out social or beneficial activities such as, in particular, the "Premio di laurea" periodically organized by the Firm and for the conservation of any images or videos;
- 7. with exclusive reference to the data referred to in letters a., b. and f. of point 1., for participation in social or charitable activities such as, in particular, the "Staffetta Telethon per un'ora" in Udine and for the



conservation of any images or videos.

The treatment will take place on the basis of the data you have communicated and in our possession with a commitment on your part to promptly communicate any corrections, additions and / or updates. Personal data will be processed in the manner strictly necessary to meet the aforementioned purposes.

3. Legal basis of the processing

The Firm treats personal data lawfully where processing:

- it is necessary for the execution of the supply contract, of a contract of which you or the company you represent or for which you work is a party, is necessary to fulfill a legal obligation incumbent on the Data Controller or to pursue the legitimate interest of the Data Controller or third parties or for the other purposes referred to in points 2.1., 2.2., 2.3., 2.4., 2.5.;
- is based on the consent expressed for the purposes referred to in points 2.6., 2.7. above.

Therefore:

- the provision of data for the purposes referred to in points 2.1., 2.2., 2.3., 2.4., 2.5 above is required. The lack of data and / or any express refusal to process will make it impossible for the Firm to carry out the assigned task or the possible violation of requests from the competent Authorities;
- the provision of data for the purposes referred to in points 2.6., 2.7, above is optional, with the consequence that you may decide not to provide consent or to withdraw it at any time.

4. Processing methods

The treatment will be carried out in compliance with the principles of correctness, lawfulness and transparency.

The processing of personal data is carried out by means of the operations indicated in article 4, no. 2) of EU Regulation 2016/679 ("GDPR") - carried out with or without the aid of IT systems - namely: collection, registration, organization, structuring, updating, conservation, adaptation or modification, extraction and analysis, consultation, use, communication by transmission, diffusion or any other form of making available, comparison, interconnection, limitation, cancellation or destruction.

The logical and physical security of the personal data and, in general, the confidentiality of the personal data processed will be guaranteed, by implementing all the necessary technical and organizational measures adequate to guarantee their security.

5. Retention of personal data

Personal Data collected for the purposes indicated in the previous points 2.1., 2.2., 2.3., 2.4., 2.5. will be treated and kept for the entire duration of the supply relationship established. From the termination of this relationship, for any reason or cause, the data will be kept:

- 1. for the duration of the statute of limitations applicable by law; in the event of acts interrupting the prescription, the retention period will be extended accordingly;
- 2. within the limits established by the regulations on data retention, to correctly fulfill any legal obligations;
- 3. within the period necessary to protect the rights of the owner in the event of any disputes.

Personal Data collected and processed for the purposes indicated in the previous points 2.6., 2.7. will be



processed and kept for the time necessary to fulfill these purposes and in any case no later than 5 (five) years from the date on which we receive your consent.

At the end of these periods, personal data will be deleted unless your express consent to continue processing.

The management and storage of personal data takes place on servers located within the firm owned or in the availability of the owner or in data centers of third parties located in the European Union.

6. Areas of communication and diffusion of personal data

Personal data may be communicated and, therefore, known and used by:

- partners, associates, collaborators, interns and employees of the Firm, in their capacity as authorized data processors (or so-called data processors) or appointed data processors; with reference to these people there is a legal obligation of confidentiality;
- third parties who carry out outsourcing activities on behalf of the Firm or provide services to the Firm and also act as data processors or: persons, companies or professional firms that provide assistance or consultancy services to the Firm in administrative, financial, tax matters, lawyer, debt collection, subjects delegated to carry out management and technical maintenance activities (including maintenance of network equipment and electronic communication networks); a complete list of all those responsible can be requested by contacting the e-mail address: protezionedati@studiomprd.it;
- subjects with whom it is necessary to interact for the organization or participation in events;
- banking, postal and insurance institutions, companies and financial and investment funds;
- subjects who process data in execution of specific legal or regulatory obligations;
- Judicial or supervisory authorities, administrations, public and national bodies and bodies, for the fulfillment of legal obligations or for the prevention of abuse or fraud or by order of these subjects.

Personal data will not be disseminated or any fully automated decision-making process, unless this is necessary to fulfill obligations under the law or regulations or to execute the professional assignment, of a contract of which you are a part or all execution of pre-contractual measures adopted upon request or, in general, for the purposes referred to in points 2.1., 2.2., 2.3., 2.4., 2.5 above.

Personal data will not be transferred to countries outside the EU.

7. Third party data

If you provide third party data, you declare that you have their consent, where necessary, and undertakes to transfer the information contained in this information to the interested party - owner of these data - relieving the Firm from any liability in this regard.

8. Rights of the interested party pursuant to and for the purposes of art. 15 and following of the "GDPR"

You, as an interested party, also on behalf of the reference staff (employees or collaborators) and / or of the shareholders and / or directors and / or auditors and / or statutory auditors and / or customers and / or suppliers of the Company it represents and / or of the Companies controlled by it or associated or however belonging to the Group, has the right:

a. to request access, rectification, cancellation, limitation of data concerning you;



- b. where possible, to oppose the processing of your data;
- c. where possible, to the portability of their data, i.e. to receive data from the Data Controller in a structured format, commonly used and readable by an automatic device and to transmit them without hindrance to another Data Controller, also through the direct transmission of data, if technically doable;
- d. where possible, to withdraw consent to the processing of data, if it constitutes the legal basis of the processing. In this case, the processing of data carried out before the revocation remains lawful;
- e. to lodge a complaint with the Guarantor for the protection of personal data;
- f. to request information about:
 - i. to the purposes of the treatment;
 - ii. to categories of personal data;
 - iii. to the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if the data are transmitted to recipients of third countries or international organizations;
 - iv. the retention period of personal data;
- v. if the data are not collected from the data subject, all available information on their origin; g. to be informed of the existence of adequate guarantees, if the data are transferred to a third country.

The rights indicated above can be exercised with a request addressed formally to the Data Controller by writing an e-mail to the address protezionedati@studiomprd.it. Appropriate feedback will be provided on request.

If you believe that your rights or those of the reference staff (employees or collaborators) and / or of the shareholders and / or directors and / or auditors and / or statutory auditors and / or customers and / or suppliers of the Company that represents and / or the companies controlled by it or connected to it or in any case belonging to the Group have been violated by the Data Controller and / or by a third party, has the right to lodge a complaint with the Authority for the protection of personal data and / or other authority of competent control pursuant to EU Regulation 2016/679 ("GDPR").

Information on the processing of personal data updated to 28 April 2021

Molaro Pezzetta Romanelli Del Fabbro & Partners	
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