

## SUPPLIERS PRIVACY NOTICE

### -Suppliers-

**REAL COMM S.R.L.**, headquartered in 33080 Porcia (PN), via dei Serviti 12, in the person of its legal representative pro tempore, Italian VAT nr. 01410160939, in its capacity of controller (hereinafter **Controller**), hereby provides you – according to art. 13 and, where necessary, art. 14 of EU Regulation nr. 679/2016 (hereinafter also **GDPR**) on the protection of personal data, and of D.Lgs 196/2003 as amended by D.Lgs 101/2018 (hereinafter also **Privacy Code**) – with the following information:

#### 1.0 REFERENCE FIGURE.

According to art. 37 GDPR the Controller has appointed the law firm Avv. Antonella D’Olivo as Data Protection Officer (hereinafter also **DPO**) who may be contacted for any matter relating to the processing of personal data of data subjects at the following addresses: 33080 Porcia (PN), via dei Serviti 12; tel: 0434-1831550; [dpo@realcomm.it](mailto:dpo@realcomm.it).

#### 2.0 CATEGORY AND SOURCE OF THE DATA PROCESSED.

The personal data held by the Controller are collected directly from You as a client (hereinafter also **Data Subject**), through its employees.

The Controller processes your common personal data (such as: first name, last name, company name, address, telephone number, email address, bank and payment details – hereinafter personal data or simply data) provided by You at the time of the conclusion of the contract(s).

#### 3.0 LEGAL BASIS AND PURPOSES OF PROCESSING.

The processing of your data is necessary for the performance of obligations arising from the contract and from the law. In particular, your personal data are processed, without your express consent (ex art. 6 lett. B, C ed F of the GDPR):

- for purposes related to the establishment and execution of the commercial contracts entered into;
- for the related accounting and for the fulfilment of tax obligations related to the relevant invoicing;
- in compliance with obligations laid down by law, by a regulation, by EU legislation, or by an order of the Authority;
- to pursue the legitimate interest of the Controller (e.g., the right of legal defence).

#### 4.0 NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL TO PROVIDE DATA

Sharing your data for the purposes stated in paragraph 3.0 is necessary; therefore, any refusal to provide such data may result in the Controller being unable to establish the contractual relationship.

#### 5.0 MODALITIES OF THE PROCESSING AND ACCESS TO DATA.

To the extent of the declared purposes, the processing of the data occurs by manual, IT, and electronic tools, with procedures strictly related to the purposes themselves and, in any case, in a manner that ensures, with the support of appropriate technical measures, the security and confidentiality of the data. Access to data is granted only to authorised personnel, who are adequately instructed and informed about their tasks and the allowed processing of the collected data.

#### 6.0 SCOPE OF DATA SHARING AND POSSIBLE DISCLOSURE.

Your data may be communicated to consultants for administrative and accounting purposes, and to legal advisors for the possible management of disputes; to credit institutions to fulfil obligations arising from the contract in place; and to other parties involved in specific phases of processing, who have been appointed – where required by law – as **External Data Processors** ex art. 28 GDPR, and whose names can be verified upon request by the data subjects by sending a communication using the methods indicated in paragraph 9.0 below. Your data may also be communicated to the DPO. Your data will not be transferred outside the European Union. The data will not be disclosed.

#### 7.0 STORAGE OF PERSONAL DATA.

The Controller will retain the data of data subjects for no longer than is necessary to achieve the purposes for which they were collected; therefore, they will be retained for the duration of the existing contractual relationship. Data strictly necessary for tax and accounting obligations, once the purpose for which they were collected has ceased, will be retained for 10 years or for a different period required by the applicable regulations.

#### 8.0 RIGHTS OF DATA SUBJECT.

According to articles 15 to 22, and 77 GDPR you may exercise:

**I.** the right of access to data (art. 15); **II.** the right to lodge a complaint with the Data Protection Authority (art. 15 and 77); **III.** the right to rectification (art. 16); **IV.** the right to erasure (erasure art. 17); **V.** the right to restriction of processing (art. 18); **VI.** the right to obtain from the Controller notification to recipients to whom the data have been disclosed of any rectification or erasure or restriction of processing (art. 19); **VII.** the right to data portability (art. 20); **VIII.** the right to object (art. 21); **IX the right to refuse**

**automated processing** (art. 22); **X.** the right to withdraw consent to processing, if given, freely and at any time, with regard to data processed based on consent. Withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal (art. 7, comma III).

In this way, you may access your data to: • Verify their accuracy; • Modify them if they become inaccurate; • Supplement them with an additional statement; • Request their erasure; • Restrict their processing; • Object to processing.

#### **9.0 HOW TO EXERCISE RIGHTS.**

All the rights referred to in the previous article 8.0 may be exercised by the data subject by sending a registered letter or an email addressed to Real Comm S.r.l. at the following addresses: via dei Serviti n. 12, 33080 Porcia -PN-; e-mail: [privacy@realcomm.it](mailto:privacy@realcomm.it) or [dpo@realcomm.it](mailto:dpo@realcomm.it).