

Information to suppliers, collaborators and contact persons at suppliers

This information is provided, pursuant to art. 13 GDPR 2016/679 - "European Regulation on the Protection of Personal Data", to suppliers natural persons (sole proprietorships and professionals), collaborators and contact persons at suppliers of TURBODEN S.p.A..

Identity of the Data Controller

The Data Controller is TURBODEN S.p.A., in the person of its pro tempore legal representative, with registered office in via Cernaia 10 - 25124 Brescia. The Data Controller can be contacted at the above address.

Contact details of the DPO (Data Protection Officer)

The DPO can be reached at the headquarters of the Data Controller or contacted by e-mail at DPO@turboden.it

Categories of data processed

The Company, depending on the cases and for the purposes described below, may process

- personal data (name, surname, fiscal code, address etc.) of suppliers;
- contact details (telephone, email, etc.) of the suppliers and of the contact persons at the suppliers;
- any other data related to the establishment and/or execution of the Contract.

Data source

The personal data processed are those provided by the Data Subjects during:

- visits or telephone calls
- direct contacts
- formulation of commercial proposals and quotations
- post-order transmissions and transactions.

Purpose of processing

The data of suppliers and contact persons are processed for the following purposes:

- 1) acquire pre-contractual data and information (e.g. evaluation of offers, quotations, preparation of documents, forwarding and exchange of communications relating to the management of the contractual relationship, etc.);
- 2) managing the contractual relationship for the purchase of goods or services (e.g. payments management, company's financial flows, receipt of goods, etc.).

Supplier data are also processed for

- 3) manage accounting and tax obligations arising from the supply relationship;
- 4) prevent and manage possible litigation in and out of court;

Legal basis of processing

The legal basis of the processing consists of:

- The need to execute pre-contractual, contractual and post-contractual obligations, for the purposes indicated in points 1, and 2.
- The fulfilment of a legal obligation for the purpose indicated in point 3;
- The legitimate interest of the Data Controller consisting in the exercise or defence of its own rights in extrajudicial and judicial proceedings for the purpose indicated in point 4.

Nature of data provision and consequences of refusal to provide data

The provision of personal data of suppliers who are natural persons (sole traders and professionals) is compulsory in order to fulfil accounting and tax obligations. The additional data processed are indispensable for the efficient and correct management of the contractual relationship. Failure to provide such data could compromise, in whole or in part, the proper management of the supply relationship with the Company.

The contact details of the suppliers' contact persons are optional but may be strictly necessary for the management of the supply relationship. Therefore, failure to provide them could compromise the correct management of the supply relationship.

Period of data retention

The Company keeps the personal data for the time necessary to pursue the indicated purposes. In this case, the data of suppliers who are natural persons (mandatory) are kept until the administrative prescription.

The contact details of the contact persons at the suppliers are kept until the relationship between the suppliers and the Company is terminated. However, any correspondence relating to the contractual relationship may be kept until the administrative statute of limitations expires and for longer periods in the event of litigation.

Data recipients

The personal data processed by the Data Controller are not disseminated, i.e. they are not disclosed to unspecified persons, in any possible form, including making them available or simply consulting them.

The data may be processed by employees and collaborators of the Data Controller, on the basis of the roles and tasks performed and for the pursuit of the purposes indicated above.

These subjects have been authorised to process the data and have received adequate operating instructions.

They may also be communicated, to the extent strictly necessary, to subjects who must supply goods or perform services on behalf of the Data Controller, who have been designated as Data Processors (e.g. companies that provide electronic invoicing services, tax assistance, etc.).

Finally, the data may be communicated to the subjects entitled to access them by virtue of provisions of the law, regulations, Community legislation.

Data transfer

Under no circumstances does the Data Controller transfer personal data to third countries or to international organisations. However, it reserves the possibility of using cloud services; in which case, the service providers will be selected from among those who provide adequate guarantees, as provided for in Article 46 GDPR 2016/679.

Rights of the Data Subjects

The Data Subjects may exercise at any time the rights provided for in the GDPR 2016/679, in particular:

- The right of access (art. 15): to request confirmation of the processing of your data and possibly a copy of the personal data in our possession and to verify the lawfulness of the processing.
- The right of rectification (Art.16): to request the rectification of the personal data we hold on you. This allows you to have the incomplete or inaccurate data in our possession corrected, although it may be necessary to verify the accuracy of the new data you have provided.
- the right to erasure (Art. 17): requesting that we erase or remove your personal data if there are no valid reasons for continuing to process it or following the exercise of the right to object (see below), in the event of unlawful processing of your data or when we are required to erase your personal data to comply with applicable law. Please note, however, that we may not always be able to comply with your request for erasure due to specific legal obligations which will be communicated to you, if applicable, at the time of your request.
- the right to restriction of processing (art.18): requesting the suspension of the processing of your personal data in the following cases:
 - a) verification of the accuracy of the data;
 - b) in the event of unlawful use of the data but you do not want us to erase them;

- c) if you request us to retain the data (which we do not need to retain) for the purpose of establishing, exercising or defending legal claims; or
 - d) if you have objected to our use of your data but we need to verify whether there are overriding legitimate reasons for using it.
- the right to portability (Art.20): request to transfer your data in an intelligible format to another entity indicated by you.
 - the right to object to the processing of your personal data (Art. 21).
 - the right to object to automated decision-making processes (Art. 22).

The Data Controller recalls in particular that any Data Subjects may exercise the right to object in the forms and ways provided for in Article 21 GDPR.

The Data Subjects may exercise their rights by writing to the Data Controller at the above address, or by email, specifying the subject of the request, the right they intend to exercise and attaching a photocopy of an identity document attesting to the legitimacy of the request.

Complaints

The Data Subjects has the right to lodge a complaint with the supervisory authority of the state of residence.

Automated decision-making processes

The Data Controller does not process personal data using automated decision-making processes.