

## Complete Privacy Policy for Suppliers

Pursuant to Article 13 of Regulation 679/2016 on the protection of personal data, the “Code on the Protection of Personal Data” (or “Privacy Code”), it is our duty to provide you with some information relating to the processing of your personal data within the context of commercial and technical relations with FRIGOMAR SRL.

### Data Controller

The Data Controller is Frigomar srl (hereinafter also referred to as the “Controller”) with registered office in Carasco (GE) Via Vittorio Veneto 112-114-116, Postcode 16042. It will be possible to contact the data controller using the following address: [privacy@frigomar.com](mailto:privacy@frigomar.com)

The Data Controller has not appointed a Data Protection Officer (DPO).

### PURPOSES AND LEGAL BASIS FOR DATA PROCESSING

Personal data, including special categories of personal data, collected during the preliminary phase and upon activation and execution of any employment/collaboration relationship, are processed by the Controller for the following purposes:

Purpose	Legal Basis
Supplier Order Management	Art. 6(1)(b)
Accounting and Tax Management (	Art. 6(1)(c)
Litigation Management	Art. 6(1)(f) manifested in the defense of the Controller's rights / Art. 9(2)(f)
Management of Data Subject Requests	Art. 6(1)(c)
Security and Protection of Company Assets	Art. 6(1)(f) manifested in the protection of company assets and the health and safety of those who access the Controller's premises

### PROVISION OF DATA

The requested data will be strictly indispensable, based on the principle of minimization and essentiality of the data. The communication of personal data is a legal or contractual obligation or a necessary requirement for the conclusion of a contract; therefore, the refusal or failure to provide, in whole or in part, the requested personal data (including special categories) may result in the Controller being unable to manage the working relationship.



## RECIPIENTS OF PERSONAL DATA

Without prejudice to communications made in fulfillment of legal and contractual obligations, all your collected and processed data may be shared, exclusively for the purposes specified above, with the following categories of recipients:<sup>1</sup>

- Employees and collaborators of <sup>2</sup>the Controller, in their capacity as persons authorized to process personal data, who have committed to confidentiality or have an appropriate legal obligation of confidentiality;
- Persons, companies, professional firms, or other third parties with whom the Controller maintains necessary relationships for the performance of its activities for the purposes indicated above or due to a legal obligation, to whom a specific mandate has been entrusted and for the time necessary to achieve the purposes for which the data were collected, who typically act as Data Processors of the Controller;
- Judicial or supervisory authorities, administrations, public bodies and organizations, in the exercise of their functions.

The Controller ensures that the processing of your personal data by the recipients indicated above is carried out in compliance with current legislation.

## METHODS OF PROCESSING

The collection and processing of your personal data by the Controller are carried out in compliance with the principles of lawfulness, fairness, and transparency and in a manner that ensures adequate security, including protection, through appropriate technical and organizational measures, against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

The collected data will be processed using electronic or otherwise automated, IT, and telematic tools, or using paper tools, with logic strictly related to the purposes for which the personal data were collected and, in any case, in such a way as to guarantee the security of the same and for the time strictly necessary to achieve the purposes for which they were collected, without prejudice to the need to store the data to comply with the obligations provided for by current legislation even after the cessation of processing operations or up to the time permitted by Italian law to protect the interests of the Controller.

Further information regarding the period of retention of personal data and the criteria used to determine this period can be requested by writing to the Controller.

## TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

Your personal data is stored on servers located at the Controller's offices, within the European Union. It remains understood in any case that the Controller, if necessary, will have the right to move the servers also outside the EU. In this case, the Controller guarantees now that the transfer of data to non-EU countries will take place in compliance with the applicable legal provisions, subject to the stipulation of standard contractual clauses as provided for by the European Commission.

## **DATA RETENTION PERIODS**

Your personal data will be stored for the time necessary to fulfill the purposes for which they were requested or for the terms established by national and community laws, regulations, and rules to which the Controller must comply. In particular, we remind you that the data relating to the Personal and work relationship documents (certificates, LUL, etc.) will be kept for the times provided for by current legislation. The complete list of retention terms or time criteria is available upon request of the data subject.

## **DATA SUBJECT RIGHTS**

In accordance with the provisions of the GDPR, you have the right to exercise the following rights:

- a. **Right of access** – To obtain confirmation as to whether or not personal data concerning you are being processed and, if so, to receive information relating, in particular, to: the purposes of the processing, the categories of personal data processed and the retention period, the recipients to whom they may be communicated (Article 15, GDPR);
- b. **Right to rectification** – To obtain, without undue delay, the rectification of inaccurate personal data concerning you and the integration of incomplete personal data (Article 16, GDPR);
- c. **Right to erasure** – To obtain, without undue delay, the erasure of personal data concerning you, in the cases provided for by the GDPR (Article 17, GDPR);
- d. **Right to restriction of processing** – To obtain from the Controller the limitation of processing, in the cases provided for by the GDPR (Article 18, GDPR);
- e. **Right to data portability** – To receive the personal data concerning you, which you have provided to the Controller, in a structured, commonly used, and machine-readable format, and to obtain their transmission to another controller without hindrance, in the cases provided for by the GDPR (Article 20, GDPR);
- f. **Right to object** – To object to the processing of personal data concerning you, unless there are legitimate reasons for the Controller to continue the processing (Article 21, GDPR);
- g. **Right to withdraw consent** at any time without affecting the lawfulness of processing based on consent before its withdrawal;
- h. **Right to lodge a complaint with the supervisory authority** – To lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), with registered office at Piazza di Montecitorio n. 121, 00186, Rome (RM).

## **METHODS FOR EXERCISING RIGHTS**

You may exercise your rights at any time by sending:

- A registered letter to: Frigomar Srl – Via Vittorio Veneto, 112 -16042 Carasco (Ge) IT
- An email to the address: [privacy@frigomar.com](mailto:privacy@frigomar.com)

Last updated 22/04/2024

**FRIGOMAR SRL** The Data Controller