



Sisal Italia S.p.A.
Via Ugo Bassi, 6
20159 Milano
www.sisal.com

SISAL PROCUREMENT PRIVACY POLICY

Last update and starting date: April 2023

Pursuant to articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter, the "**Regulation**"), Sisal Italia S.p.A., as Data Controller, wishes to inform the Data Subjects about the purposes and methods of the processing of the Personal Data, their sphere of communication, as well as the nature of their provision, within the context of the registration and the use of the Sisal Procurement platform (the "**Platform**").

DEFINITIONS

Personal Data: any information regarding the Data Subjects, for example identification data, location, tax code, IBAN, as defined in article 4 of the Regulation.

Data Subject(s): the natural persons operating in the context of their entrepreneurial, institutional or professional activity, who register and use the Platform and participate to the events organized through the Platform, and their representatives and / or collaborators and / or persons in charge and / or partners, including the beneficial owner, if required by law, whose data are collected through the use of the Platform.

Data Processor(s): third parties that carry out Personal Data processing activities on behalf of the Data Controller, pursuant to art. 28 of the Regulation.

DATA CONTROLLER

Sisal Italia S.p.A., with registered office in 20159 Milan, Via Ugo Bassi 6, which can be contacted at privacy-sisal@legalmail.it.

DATA PROTECTION OFFICER

The Data Controller designated a Data Protection Officer ("DPO"). The DPO can be contacted at the following email address: dpo@sisal.it.

SOURCE OF PERSONAL DATA

The Personal Data processed by the Data Controller are acquired by the Data Controller directly and / or through third parties specifically appointed to this from the Data Subjects (i.e. in the context of the registration and the use of the Platform and the participation to the event organized through the Platform) and / or from third parties (e.g. commercial information and financial risk companies), also through the remote communication techniques used by the Data Controller (e.g. websites). Data from public sources will also be used, such as public registers, lists, documents that can be known by anyone (e.g. financial statements, information contained in the register of companies within the Chambers of Commerce, real estate deeds and other detrimental acts, such as the registration of mortgages or the transcription of foreclosures, injunctions or other judicial documents), as well as data extracted from publicly and generally accessible sources, such as printed or digital newspapers and websites of public bodies or other supervisory and control authorities.

PURPOSES OF THE PROCESSING AND LEGAL BASIS

- 1) **Execution of obligations necessary for the conclusion of a contract:** the processing of

Personal Data referred to in this point is necessary to allow the Data Subject to register on the Platform, create and manage an account and receive invitations to participate in the events organized on the Platform, as well as to respond to any requests for registration support received through the use by the Data Subject of the contacts published on the Platform and for the performance of activities connected and instrumental to such services such as, for example, the processing and storage of the Personal Data processed. Processing is necessary in order to take steps at the request of the Data Subject prior to entering into a contract (art. 6 paragraph 1 lett. b) of the Regulation)

- 2) **Compliance with a legal obligation to which the Data Controller is subject and with orders / instructions of a public authority and / or a supervisory body:** Personal Data are processed by the Data Controller to fulfill legal obligations, both national and European, to which the Data Controller is subject (e.g. obligations imposed by legislation aimed at combating money laundering, corruption, terrorism, the marketing of child pornography material and tax evasion, etc.), and to any orders / provisions of public authorities and / or supervisory bodies (e.g. Ufficio Indagini Finanziarie, Bank of Italy, Agenzia delle Entrate, judicial authority, Agenzia delle dogane e dei Monopoli, authorities of public safety, Ministero delle Attività Produttive, etc.). Processing is necessary for compliance with a legal obligation to which the Data Controller is subject (art. 6 paragraph 1 lett. c) of the Regulation).

- 3) **Pursuit of the legitimate interest of the Data Controller:** the processing of Personal Data referred to in this point is necessary for the pursuit of the legitimate interest of the Data Controller relating to the protection of corporate assets, including the Platform, verification of the truthfulness of the data and documents provided by the Data Subject, verification of potential conflicts of interest, monitoring and verification of the quality of the service, management of disputes and exercise or defense of a right out of court and in court, reporting and audit and management of reputational checks. Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller (art. 6 paragraph 1 lett. f) of the Regulation).



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Codice fiscale, partita IVA e n.ro di iscrizione nel Registro delle Imprese di Milano - Sezione ordinaria: 02433760135

Sede legale: Via Ugo Bassi 6 - 20159 Milano - T.02.88681 - sisalitalia@legalmail.it

Dati per Fatturazione: Partita IVA 10541150966

Codice destinatario per Fatturazione Elettronica: A4707H7

CATEGORIES OF DATA PROCESSED

The Personal Data processed by the Data Controller belong to the following categories: **identification and contact data** (e.g. name, surname, email address, phone number, user ID and password used for the access to the Platform); **browsing data** (e.g. the IP address of the device used); **data relating to entrepreneurial, institutional, political or professional activity** (e.g. revenue, number of employees); **data relating to criminal convictions and offenses** (within the limits of the applicable legislation); **any other data voluntarily communicated to the Data Controller by the Data Subjects** in the context of communication with them. Where necessary, for the pursuit of the purposes described above, the data may also concern other subjects connected to the Data Subject (e.g. people with whom the Data Subject has a conflict of interest).

MODE OF PROCESSING

The data is processed using **IT, telematic and manual tools**, with logic strictly related to the purposes outlined above and, in any case, in compliance with the precautions, guarantees and necessary measures prescribed by the reference legislation, in order to ensure the **confidentiality, integrity and availability** of the Personal Data, as well as to avoid damage, whether tangible or intangible (e.g. loss of control of Personal Data or limitation of rights, discrimination, identity theft or usurpation, financial losses, unauthorized decryption of pseudonymization, damage to reputation, loss of confidentiality of Personal Data protected by professional secrecy or any other significant economic or social damage).

COMMUNICATION AND DISSEMINATION

For the pursuit of the aforementioned purposes, the Data Controller reserves the right to communicate Personal Data to recipients belonging to the following categories:

- public authorities and / or supervisory bodies (e.g. judicial authority, Bank of Italy, Agenzia delle dogane e dei Monopoli, public security authority, Ufficio Indagini Finanziarie, etc.);
- other companies of the group to which the Data Controller belongs, or in any case parent companies, subsidiaries or associates, pursuant to art. 2359 of the Italian Civil Code, also located abroad, in the context of the existing intercompany agreements for the management of the activities referred to in the aforementioned purposes;
- companies that compare the data provided by the Data Subjects with those available on public registers, databases, lists, deeds or documents in order to verify their truthfulness and the existence of detrimental acts, also in compliance with the due diligence obligations imposed by the anti-money laundering legislation;
- subjects that provide services for the management of the Data Controller's information

- system and telecommunications networks (including chat and mailing services);
- subjects that perform data acquisition, processing and storage services;
- subjects who carry out assistance activities to the Data Subject (e.g. call centers);
- professional firms or companies in the context of assistance and consultancy relationships (e.g. business consultants, law firms);
- subjects who control, review and certificate the activities carried out by the Data Controller;
- subjects with procurement responsibilities or who act under a purchasing management mandate on behalf of the Data Controller;
- subjects who in various capacities succeed the Data Controller in the ownership of legal relationships (e.g. assignees or potential assignees of goods, credits and / or contracts).

The subjects belonging to the categories listed above operate independently as separate **data controllers**, or as **Data Processors** appointed for this purpose by the Data Controller. The updated list of the third parties to which Personal Data are communicated is available by submitting a request to privacy_sisal@legalmail.it. The data may also be known, in relation to the performance of the tasks assigned, by the Data Controller staff, **specifically authorized by the Data Controller to the processing**. Personal Data, in any case, will not be disseminated and, therefore, will not be brought to the attention of indeterminate subjects, in any form, for example by making them available for consultation, without the express consent of the Data Subject, when requested.

TRANSFER OUTSIDE OF THE EU

The Data Controller informs the Data Subjects that, for the pursuit of the aforementioned purposes, the Personal Data of the Data Subjects could be communicated to subjects located in countries **outside the European Union**, who cooperate with the Data Controller in the realization of the aforementioned purposes. In any case, this transfer will take place only against the existence of international agreements or adequacy decisions by the Commission (pursuant to art. 45 of the Regulation) or against the stipulation of binding corporate rules ("BCR", pursuant to Article 47 of the Regulation) or in any case on the basis of other appropriate guarantees that guarantee an adequate level of protection for the Personal Data communicated or transferred. A copy of the Personal Data possibly transferred abroad, as well as the list of third countries / international organizations to which the Personal Data have been transferred, can be requested to the Data Controller at the email address privacy_sisal@legalmail.it.

RETENTION PERIODS

Personal Data will be kept by the Data Controller for the following periods of time, based on the different purposes indicated above:

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- a) for the execution of the obligations necessary for the conclusion of a contract (purpose 1), the Data Controller will keep the Personal Data of the Data Subjects **for the time when the account is active and until the request for deactivation of the account by the Data Subject**, or for **24 months** from the acquisition or from the last activity carried out on the Platform in case of non-use of the same;
- b) for the fulfilment of legal obligations and orders/provisions of public authorities and/or supervisory bodies (purpose 2), the Data Controller will keep the Personal Data **until the fulfilment of the regulatory obligation or of the order/provision of the authority and/or supervisory body**;
- c) for the pursuit of legitimate interests (purpose 3), the Data Controller will keep the Personal Data **until the legitimate interest of the Data Controller is exhausted**, taking into account the balance of the rights of the latter and the Data Subject.

Once these terms have elapsed, the Data Controller will **delete** the Personal Data of the Data Subject, or **transform them anonymously in an irreversible manner**.

DATA SUBJECTS RIGHTS

Pursuant to articles 15 to 22, the Regulation confers on the Data Subjects the possibility to exercise specific rights. In particular, the Data Subject can obtain: a) confirmation of the existence of processing of personal data concerning him and, in this case, **access** to such data; b) the **correction** of inaccurate Personal Data and the **integration** of incomplete Personal Data; c) the **cancellation** of Personal Data concerning him, in cases where this is permitted by the Regulation; d) the **limitation of processing**, in the cases provided for by the Regulation; e) the **communication**, to the recipients to whom the Personal Data has been transmitted, of requests for rectification / cancellation of Personal Data and limitation of processing received by the Data Subject, unless this proves impossible or involves a disproportionate effort; f) the receipt, in a structured format, commonly used and readable by an automatic device, of the Personal Data provided to the Data Controller, as well as the transmission of the same to another data controller (so-called **data portability**). The Data Subject also has the right to **object** at any time, for legitimate reasons, to the processing of Personal Data concerning him, even if pertinent to the purpose of the collection, except in the case in which the Data Controller demonstrates the presence of overriding legitimate reasons or to exercise or defend a right pursuant to art. 21 of the Regulation. The Data Subject also has the **right not to**

be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or which significantly affects his person in a similar way, unless this decision: a) is necessary for the conclusion or execution of a contract between the Data Subject and the Data Controller; b) is authorized by the law of the Union or of the Member State to which the Data Controller is subject; c) is based on the explicit consent of the Data Subject. In the cases referred to in the aforementioned letters a) and c), the Data Subject has the right to obtain human intervention from the Data Controller, to express their opinion and to contest the decision. The Data Subject can submit requests to the address privacy_sisal@legalmail.it indicating in the subject "Privacy - exercise of privacy rights", detailing which right he intends to exercise and providing the Data Controller with the information needed to identify him in accordance with Articles 11 and 12 of the Regulations. Furthermore, the Data Subject has the **right to lodge a complaint with the supervisory authority**, in particular in the Member State in which he habitually resides, works or in the place where the alleged violation has occurred (e.g. the Garante per la Protezione dei Dati Personali in Italy, which can be contacted at the addresses available on the website www.garanteprivacy.it), as required by art. 77 of the Regulation, as well as to **take the appropriate judicial offices** pursuant to art. 78 and 79 of the Regulation.

NATURE AND OBLIGATORINESS OF THE PROVISION

The provision of Personal Data is **mandatory** for the purposes referred to in points 1) and 2) of the paragraph "Purposes of the processing and legal basis". Any refusal by the Data Subject to provide the necessary information will make it impossible for the same to register and use the Platform. The processing for the purposes referred to in point 3) is **not mandatory** and the Data Subject may oppose this processing in the manner indicated in the paragraph "Data Subject Rights" of this policy, and if the Data Subject objects to said processing his/her data cannot be used for this purpose, except in the case in which the Data Controller demonstrates the presence of overriding legitimate reasons or the exercise or defense of a right pursuant to art. 21 of the Regulation.

UPDATE OF THIS POLICY

The Data Controller reserves the right to periodically update the content of this page. The Data Subject is therefore invited to periodically consult the information contained herein so as to stay updated with respect to any changes that have occurred since the last consultation.



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