


**PRIVACY POLICY FOR CLIENTS AND SUPPLIERS**

**Mandatory information regarding the protection of
personal data.
Articles 13 - 14 of Regulation (EU) 2016/679.**

M.01.09D

rev. 0
05/09/2018

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Dear Sir / Dear Madam,

Pursuant to articles 13 and 14 of Regulation (EU) 2016/679, DEA S.r.l. (hereinafter Company), with registered office in Via Masaccio, 15 Industrial Area of Mancasale - 42124 - Reggio Emilia - (RE), VAT No. 02470790359 e-mail: info@deaworklab.it as Data Controller (hereinafter the Controller), provides you with the following information regarding the processing of your personal data.

Without prejudice to the definitions referred to in Article 4 of the General Data Protection Regulation (EU/2016/679) the following words will have the following meanings:

DEA Srl: the set of human, technological, logistical, and organisational resources used in processing operations, consisting of data, applications, organisation rules and procedures for acquiring, storing, processing, and disseminating your personal data.

I. -Nature of the Personal Data.

Personal Data.


The data transmitted by you in relation to your personnel in charge of executing and managing contracts with the Company, including name, surname, contact details, e-mail addresses, professional qualifications where relevant; any data relating to wages and contributions paid and the regularity of contributions towards the staff you use for providing the Company the services when this data is required by law (hereinafter "Data Subjects") - whether directly supplied by you or found at public sources (Chambers of Commerce) - will be processed by the Company, in accordance with the Regulation and the national legislation including any provisions issued by the Supervisory Authority (Guarantor for the protection of personal data) where applicable.

If the clients/suppliers are physical people, in addition to the data mentioned above including data relating to invoicing and payments (including VAT number and tax code), bank details, enrolment in registers or books, the Company may process economic and financial data (such as economic solvency).

Purpose of the data processing.

The Company in the performance of its economic and commercial activities may process the Data Subjects' Data for purposes connected with the possible selection, establishment, management and execution of the contractual relationship (including the management of the pre-contractual relationship and/or inclusion in the Company's supplier register. In particular, the data will be processed for the fulfilment of legal and regulatory obligations (e.g. tax and accounting obligations, those deriving from the regulation of procurement contracts, and health and safety at work): for the opening of the supplier registry; the administrative management of contracts, including the management of any disputes, the execution of internal controls (security, productivity, quality of services, capital integrity), and certification. The data subject's data may also be processed for periodic assessment of the existence of the ethical and legal requirements established by the Company in its Code of Ethics and during quality, process, product, or sustainability audits carried out on your premises. The processing of data for the purposes mentioned above does not require specific consent since the Company may avail itself of the exemptions included in Article 6.1 b) and 6.1 c) of the Regulation.

If the clients/suppliers are natural persons, the processing of economic and financial data, such as commercial information and the financial statements, the Company avails itself of the exemption contained in letter 6.1 f) (the Company's legitimate interest to verify the economic and financial solidity of its business partners).

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II. - Nature of the provision and processing methods.

The Data Subject's data must be conferred and, failing this, it will not be possible to establish any commercial relationship, properly execute pre-contractual and contractual obligations or, if a contractual relationship is already established, fulfil the obligations and commitments arising therefrom.

The Data Subjects' personal data may also be collected through the video surveillance systems present in the access and exit areas of the Company premises and within the premises themselves, where the Data Subjects are present on the Company premises.

The data will be processed and stored on paper and computer media within the company, including data bases placed on the company's intranet or on servers available to the Data Controller residing abroad, in compliance with Articles 44 and following. of Reg. Gen. 679/2016 and any General Authorisations for the processing of sensitive data in labour relations, for a period not exceeding that necessary to fulfil legal obligations and to pursue the aforementioned purposes, in compliance with the pertinent, non-excess, and indispensability principles. Data can also be processed using automated tools to store, manage, or transmit the data and, in any case, it will be performed in compliance with the current legal provisions.

Storage and Security.

The data will be stored in compliance with the applicable legislation for the protection of personal data for the entire period of time necessary to fulfil the aforementioned purposes. In particular, the data will be kept for the entire duration of the contractual relationship and after the termination of the same in compliance with civil and fiscal obligations.

Your data will be processed with the support of paper, computer or electronic means with suitable methods and tools to guarantee, with reference to the state of the art, the confidentiality, integrity, and availability of data, in compliance with the provisions of Article 32 of the General Data Protection Regulation (EU 2016/679), by specifically appointed subjects, in compliance with the provisions of Article 29 et seq. of GDPR 2016/679.

Personal data will be stored within the European Union, the related security policies are reviewed in accordance with the relevant Best Practices. The logic of the processing, including cryptography, will be strictly related to the purposes illustrated. In particular, your data will be stored and/or processed by computer procedures, and processed by natural or legal persons who, by virtue of a contract with the Data Controller, provide specific processing services or perform activities that are related, instrumental or that support those of the Data Controller.

Data access.

For the purposes referred to in point (I) of this Privacy Policy, your data may be made accessible to: 1) the Data Controller's personnel and collaborators in their capacity as appointees and/or internal and external data processors and/or system administrators identified in writing and to whom specific instructions have been given: employees of the personnel office; data controllers and employees of the payroll processing company, as appointees or data processors, professionals or service companies for administration and business management that operate on behalf of the Data Controller. 2) third-party companies or other subjects (for example, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, etc.) that carry out outsourced activities on behalf of the Data Controller, in their capacity as external processors.

III. - Rights of the data subject.

You may exercise your rights at any time pursuant to the provisions set forth in sections 2, 3, 4 of Chapter III of Reg. Gen. 679/2003, and in particular:

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1. request confirmation of the existence or not of your personal data;
2. obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data has been or will be disseminated and, when possible, the storage period;
3. obtain the correction and deletion of data;
4. obtain the limitation of processing;
5. obtain data portability, or rather, the receiving of data from a data controller, in a structured format that is commonly used and readable by an automatic device, and transmitting them to another data controller without impediment;
6. oppose the processing at any time and also in the case of processing for direct marketing purposes;
7. oppose an automated decision-making process relating to natural persons, including profiling.
8. Lodge a complaint to a competent authority, in Italy the Authority for the Protection of Personal Data, located in Piazza di Monte Citorio No. 121, 00186, ROME.

Where applicable, it also has the rights set forth in Articles 16-21 GDPR (Right of rectification, right to be forgotten, right to limitation of processing, right to data portability, right to object), as well as the right to lodge a complaint to the to the Authority for the Protection of Personal Data.

You are entitled at any time to revoke your consent to the processing of your personal data without, however, affecting the lawfulness of the processing based on the consent given before the revocation.

If you wish the processing of your data to be interrupted by cancellation, or destruction of the related records or reproductions, you can send a communication accompanied by a photocopy of your identity document (which will be immediately destroyed). At the end of this operation your personal data will be removed (as specified above) from our archives as soon as possible.

IV. - Data Controller, processor, and appointees.

The Data Controller of your personal data is DEA S.r.l., with registered offices in Via Masaccio, 15 Industrial Area Mancasale - 42124 - Reggio Emilia - (RE), e-mail. info@deaworklab.it, which you can contact to exercise the right of access, asking to obtain confirmation of the existence of the data and to know its content and origin, verify its accuracy or request its integration, updating or rectification, and to oppose processing for legitimate reasons. The updated list of data processors and appointees is kept at the registered office of the Data Controller. The names of the System administrators responsible for the Management of Information Systems on which the Personal and Sensitive Data transit are made available at the request of the data subjects.

V. - Data Protection Officer.

DEA S.r.l. Has not appointed a Data Protection Officer since it does not have this obligation pursuant to the provisions of Article 37 of EU Regulation 679/2016.

Reggio Emilia, 05/09/2018

For DEA Srl
The pro tempore legal representative

Rosolino Di Betta