

# SUPPLIERS PRIVACY POLICY

Artt. 13 -14 Reg. EU 2016/679 "GDPR"

## WHO IS THE DATA CONTROLLER?

The Data Controller is **Gaggiotti Drilling Tools Srl**, Via Francesco Crispi, 20/22, 60027 Osimo (AN), Tel. +39 071 7108171, Email: [amministrazione@gaggiotti.com](mailto:amministrazione@gaggiotti.com). More information on the website: <https://gaggiotti.com/>

## WHICH IS THE AIM OF THIS PROCESSING?

We process your data for procedural purposes related to suppliers' management in fulfilment of contractual and legal obligations as required by civil, tax, accounting, administrative management and security regulations. In addition, they may also be processed for a scheduling of supply activities, order history, internal control services, evaluation of the quality of services provided, handling of complaints, and for responding to forwarded inquiries. Direct contact data (phone number, e-mail, contact details, etc.) referring to its workers and collaborators and company-specific data always inherent to the existing contract between the parties may be collected and catalogued to improve the relevant references within our organization.

## ON WHAT LEGAL BASIS DO WE PROCESS DATA?

The legal bases vary according to the purposes pursued and indicated above, so, with reference to the point:

- a) Pursuant to Article 6 GDPR, letters b) and c), the processing is necessary for the performance of a contract to which the Data Subject is party or for the performance of pre-contractual measures taken at the Data Subject's request, as well as to comply with legal obligations to which the Data Controller is subject.

## WHO DO WE COLLECT DATA FROM?

We always collect personal data directly from the Data Subject wherever possible. If necessary, for the purposes of the relationship with the Data Subject, we may make requests to public agencies or perform research of public records and/or databases.

## WHAT CATEGORIES OF DATA DO WE PROCESS?

Mainly we request and process only personal data categorized as "common". The provision of some personal data is mandatory to follow up on the supply relationship and its fulfilments, so without them, we will not be able to go on with the relationship.

## WHO DO WE DISCLOSE PERSONAL DATA TO?

Data are processed at the legal and operational headquarters of the Data Controller and at any other place where the parties involved in the processing may be located. Where applicable, your personal data may be disclosed to other public bodies by complying with the obligations under laws and regulations. In case they are appropriate, they may be communicated to external companies performing outsourced activities on behalf of the Controller, in their capacity as Data Controllers. These latter are accredited and authorized to process data exclusively for specific purposes, respecting the protection of personal data. All Data Controllers have been individually identified and have received appropriate instructions to guarantee the rights of Data Subjects.

## HOW DO WE PROCESS THE DATA?

Your personal data will be processed using paper and digital systems.

Only personnel authorized by the Data Controller may access your data to carry out processing or systems maintenance operations. We take all useful technical and organizational measures to avoid problems of unauthorized access, disclosure, modification or destruction. We specify that we do not use, within our organization, automated decision-making, including profiling, that produces legal effects that concern you and/or significantly affect you personally.

### **IS DATA TRANSFERRED TO COUNTRIES OUTSIDE THE EU?**

Your data will not be transferred to third countries outside the European Union and with data protection regulations that are not aligned with the EU Regulation 2016/679. Moreover, they will not be subject by us to any dissemination to unauthorized third parties for purposes other than those stated in this policy.

### **HOW LONG DO WE KEEP DATA?**

Your data will be processed for as long as necessary to achieve the stated purposes for which it was collected and will be retained for the duration of the contractual relationship. They may also be kept even after the termination of the relationship for the full duration necessary to discharge the obligations contractually undertaken and to carry out the relevant fulfillments required by current legal regulations. At the end of the stipulated period, the data will be destroyed, redelivered or processed by ensuring compliance with the principle of minimization for the protection of the rights and freedoms of the Data Subject and always storing them with appropriate technical and organizational security measures.

### **WHAT ARE YOUR RIGHTS?**

The Data Subject has the right to request for access to the Data Controller and rectification or erasure of personal data or the restriction of processing concerning him or her or to object to its processing; as well as the right to data portability, in accordance with the GDPR and, therefore, at any time he or she may ask for a digital copy of the data or its automatic transfer to other companies. In the prescribed cases, it may also object to or revoke the consent given. This is without prejudice to the Data Subject's right to lodge a complaint before the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)). Any request to exercise rights will be evaluated within the limits of Articles 23 GDPR and 2-undecies and 2-duodecies Privacy Code. In order to do that or to obtain information on their content, we invite you to send a request by e-mail to the address of the Data Controller, indicated above, using the *"Form for the Exercise of Data Subject's Rights"* provided on the website or at the corporate offices.