## Privacy Policy Suppliers ex art. 13 EU Reg. 2016/679

SAET Spa (VAT no. 00204610281) with registered office in Selvazzano Dentro (PD) Via Moravia n. 8, Italy, as Data Controller of your personal data, pursuant to and for the purposes of Article 13 of EU Regulation 2016/679 (GDPR - General Data Protection Regulation) hereby informs you that current legislation foresees the protection of individuals with regard to the processing of their personal data.

The data will be processed by both electronic and paper means and will be based on the principles of lawfulness, correctness, transparency, limitation of purposes and storage, minimization of data, accuracy, integrity and confidentiality. Personal data will be processed in compliance with applicable legislation and the confidentiality obligations therein provided.

1.- Data Controller. Responsible for the treatment. The Data Controller is SAET Spa (VAT no. 00204610281) with registered office in Selvazzano Dentro (PD) Via Moravia n. 8, Italy, e-mail: <a href="mailto:info@saetpd.it">info@saetpd.it</a>.

## 2.- Types of data processed.

COMMON PERSONAL DATA	personal and fiscal data
DATA OF THIRD PARTIES	e.g. contact data of employees or collaborators with whom the Data Controller will communicate.
PARTICULAR AND JUDICIAL DATA OF YOUR EMPLOYEES (SUB-CONTRACT)	particular and / or judicial data processed in the context of a subcontracting

With regard to the provision of personal data of third parties (e.g. contact data of employees or collaborators), and those particular of your employees, you do warrant that such parties have expressly authorized you to provide their personal data on the basis of an appropriate legal basis that justifies their processing. With respect to these hypotheses, you are independent Data Controller and you assume all the obligations and responsibilities of the law, conferring on this point the widest possible indemnity with respect to any dispute, claim, request for compensation for damage caused by processing, etc. that may reach SAET Spa from third parties whose personal data have been processed through your requests in violation of the applicable legislation.

## 3.- Purpose or legal basis of the processing. Mandatory/optional nature of the provision of personal data.

Personal data will be processed for the following purposes:

Purpose of treatment	Legal basis	Type of data	Mandatory or optional	Consequences of refusal
Establishment and execution of the pre-contractual and / or contractual relationship between the supplier and SAET SPA (eg management of orders / procurement of goods or services, including professional and qualified)	- execution of a contract with the interested party or pre-contractual measures aimed at this; - compliance with a legal obligation (social security legislation, tax legislation, safety at work).	- Common personal data.	Optional.	Inability to establish or continue the contractual relationship.
Data Communication to contracting Stations and Customers	- execution of a contract - legitimate interest of the Data Controller - compliance with a legal obligation	- Common supplier data (personal and fiscal data) - Data on criminal convictions and offenses of employees and partners of the supplier (in relation to which the supplier is the Data Controller, see point 2 above).	Optional.	Inability to establish or continue the contractual relationship.

- **4.-** Automated processes. No automated decision-making processes are applied to the processing of personal data for the purposes of this information notice.
- 5.- Communication, dissemination. Recipients or categories of recipients of personal data. Your data will be processed by employees and / or collaborators of the Data Controller, specifically authorized and bound to confidentiality.

Your personal data, where necessary and within the limits of the processing purposes indicated, may be communicated to:

- public bodies (Italian bodies: INPS, INAIL, "Direzione Prov.le del Lavoro", Financial Administration, "Agenzia delle Entrate" or other public administrations to which the communication of data is required by law);
- professionals and service companies for the administration and management of the company that operate on behalf of the company (e.g. accountant, employment consultant, lawyer, occupational safety managers, etc.);
- insurance companies;
- leasing companies;
- credit institutions;
- responsible for the maintenance of the company's computer systems, to the extent strictly necessary for the performance of their activities;
- Judicial authorities and/or Police forces in case of necessity for the detection and repression of crimes;
- Customers

Your personal data will not be disclosed.

**6.- Transfer of data to a third country.** Your data may be transferred outside the European Union only if the client is based abroad and / or the communication of the data of the members is a condition to participate in the tender or to win a contract. In this case the condition of lawfulness of the export depends on the destination State. In this sense, SAET undertakes to verify from time to time that the communication of data abroad takes place in compliance with the guarantees deemed adequate by current legislation.

For further information on this point, we invite you to contact the Data Controller at the addresses indicated above.

7.- Data retention times. Your personal data will be retained for the time strictly necessary to achieve the above purposes.

SAET Spa will process your personal data for the time allowed by Italian law to protect its own interests or for the time required by law.

More information about the period of storage of personal data and the criteria used to determine this period can be requested by writing to the Data Controller at the addresses indicated above.

8.- Rights of the interested party. As you are interested party with regard to the processing of your personal data, you have the right to obtain confirmation as whether or not such data exists, to be informed about its contents, to verify its accuracy, to access to your data, to request its origin, rectification, integration, erasure, purpose and method of processing, the updating if incomplete, incorrect or collected in breach of the law, and to object to its processing and to obtain a restriction on processing; you have the right of transformation into anonymous form of your data and of blocking them if processed unlawfully; finally, you have the right to have your data portable.

Requests should be addressed to the Data Controller by registered letter with return receipt or by e-mail to the addresses indicated in point 1).

**9.- Complaints**. Interested parties who believe that the processing of their personal data has been processed in a way that does not comply with the law, have the right to lodge a complaint with the Guarantor Authority, as provided for in art. 77 of the Regulation itself, or to bring an action before the appropriate courts (art. 79 of the Regulation).

Selvazzano Dentro (PD) - Italy, 10 January 2019

SAET Spa

Via Moravia, 8 -Tel. 049.8989711
35030 SELVAZZANO D. (Padova)
C.F. e P. IVA 00204610231