

# Information notice on the processing of personal data

Pursuant to Articles 13 and 14, EU Regulation 2016/679

(General Data Protection Regulation - GDPR)

This information notice applies to the personal data collected by the companies listed below (the “**Companies**”) concerning you and/or your business (where data thereof qualifies as personal data under the applicable data protection legislation) (the “**Supplier**”), as well as your legal representative, employees, collaborators, and general contact persons, in the context of the contractual relationship between the Supplier and each Company.

It is understood that it is the Supplier’s responsibility to inform its legal representatives, employees, collaborators and contact persons in general about the processing of their personal data as described in this notice and obtain their consent where required.

## Data Controllers

The following companies will process the data as independent data controllers:

- Cedacri S.p.A., with registered office in Milan (MI), Corso Monforte 30;
- C-Global - Cedacri Global Services S.p.A., with registered office in Collecchio (PR), Via del Conventino 1;
- Docugest S.p.A., with registered office at Collecchio (PR), Via del Conventino 1;
- SiGrade S.p.A., with registered office in Collecchio (PR), Via del Conventino 1;
- CAD IT S.p.A., with registered office in Verona (VR), Via Torricelli 44/A.

Data controllers may be contacted at: [ufficioprivacy-cedacri@iongroup.com](mailto:ufficioprivacy-cedacri@iongroup.com).

## Data Protection Officers

For Cedacri, C-Global, Docugest e SiGrade, the contact details of the Data Protection Officer (DPO) are the e-mail address [RPD\\_members-Cedacri@iongroup.com](mailto:RPD_members-Cedacri@iongroup.com) or the phone number 0131-272324.

## Methods of personal data processing

Most of the data we collect is provided by the Supplier during the qualification process in the Supplier Register, the negotiation and execution of the contract, as well as throughout the contractual relationship. Additionally, we may collect the Supplier’s personal data from third parties (e.g., business information service providers) or public registers.

We do not use any form of exclusively automated decision-making in connection with the processing of the personal data collected

## Categories of personal data

The personal data processed by the Companies include, in particular: identification data (e.g., first and last name, date of birth, company name, VAT number, tax code, information shown on identity documents), contact details (e.g., phone numbers and email addresses), professional information (e.g., business sector, roles within the organization, goods and services offered), economic information (e.g., bank account number, payment and invoicing details), information related to orders placed and/or contracts concluded, additional information (including information on tax and social security compliance such as DURC – Documento Unico di Regolarità Contributiva).

## Purposes of personal data processing

Personal data will be processed by the Companies for the following purposes:

- to perform the contract to which the Supplier is a party; in particular, the data will be used for the establishment and management of the relationship with the Supplier, as well as for complying with contract-related

### CEDACRI Sp.A.

Iscrizione al Registro delle Imprese di Milano Monza Brianza Lodi e  
Codice Fiscale 00432960342,  
Rappresentante del Gruppo IVA  
Cedacri - P.IVA 02952290340  
Numero REA MI - 2075277  
Capitale Sociale: 12.609.000 € i.v.

### Sede legale

20122 Milano  
Corso Monforte, 30  
Tel. 0521 8071  
Fax 0521 807372

43044 Collecchio (PR)  
Via del Conventino,1  
Tel. 0521 8071

15073 Castellazzo Bormida (AL)  
Via Liguria, 529  
Tel 0131 272111

70132 Bari  
Strada Bitonto -  
Aeroporto Palese18/E  
Tel 0521 8071

25132 Brescia  
Via Valcamonica,17/A  
Tel 030 241791

20057 Assago (MI)  
Strada N.1, Palazzo F4/F6  
Tel. 0521 8071

00185 Roma  
Via Parigi, 11  
Tel. 0521 8071

obligations;

- b) to comply with the obligations imposed on the Companies by Italian and European laws, where relevant to the relationship;
- c) to assess technical, economic and financial suitability of the Supplier, as well as to verify the Supplier's compliance with the requirements set by Cedacri Group internal procedures, including as part of the qualification process in the Supplier Register or its update, and for audit, certification, or assessment activities conducted by the Companies (e.g., ISAE, ISO), during which the data may be communicated to third parties (e.g., auditors, certification bodies);
- d) to fulfil contractual obligations towards their clients, including in relation to verification, audit, or inspection activities carried out by clients directly or through third parties, during which information about the Suppliers may be shared;
- e) to ascertain, exercise, and defend their rights in legal proceedings.

The processing of data for the purpose under point a) does not require the Supplier's consent as it is necessary for the performance of the contracts to which the Supplier is a party or for the adoption of pre-contractual measures taken at the Supplier's request, pursuant to Article 6, paragraph 1, letter b) of GDPR.

The processing of data for the purpose under point b) does not require the Supplier's consent as it is necessary to comply with legal obligations which the Companies are subject to, pursuant to Article 6, paragraph 1, letter c) of the GDPR.

The processing of data for the purposes under points c), d) and e) does not require the Supplier's consent as it is necessary for the pursuit of the legitimate interests of the Companies, pursuant to Article 6, paragraph 1, letter f) of the GDPR.

#### **Mandatory or optional nature of providing personal data**

The provision of the above-mentioned personal data is necessary for the pursuit of the purposes indicated. Failure to provide such data may prevent the establishment or proper management of the relationship.

#### **Data retention period**

Most of the Supplier's personal data will generally be retained for the entire duration of the contractual relationship and for 10 years after its termination.

#### **Entities that may process personal data**

Personal data may be made accessible to, disclosed to, or communicated to the following parties, that will be appointed by the Companies as persons authorised to process data or data processors, or will act as independent data controllers:

- the Companies' employees or collaborators;
- companies belonging to the same corporate group as the Companies;
- auditors and certification bodies;
- public or private entities, natural or legal persons, engaged by the Companies to achieve the purposes listed above (e.g. service providers) or to whom the Companies are required to disclose personal data pursuant to contractual or legal obligations (e.g. clients or public authorities).

In the event that any of the above-mentioned parties are located outside the European Economic Area (EEA), Supplier's personal data will be transferred, in the absence of adequacy decisions and any of the derogations set out in Article 49 of the GDPR, on the basis of the standard contractual clauses set out in Article 46 paragraph 2 letters c) and d) of the GDPR.

#### **Rights of the data subjects**

Pursuant to Articles 15 to 22 of the GDPR, the Supplier has the right to:

- (1) be informed of the purposes and methods of processing its personal data;
- (2) access its personal data;
- (3) rectify incomplete, inaccurate or outdated personal data;
- (4) obtain, if the conditions are met, the deletion of its personal data;
- (5) obtain, in the cases provided for by law, the restriction of the processing of its personal data;

(6) object in whole or in part, in the cases provided for by law, to the processing of its personal data;

(7) obtain, if technically feasible, the portability of personal data.

Where consent is required for the processing of personal data, the Supplier may also withdraw its consent already given at any time, without prejudice to the lawfulness of the processing based on the consent given prior to the withdrawal.

The Supplier may exercise the rights and request above and request any information on the processing of its personal data by contacting the Data Controllers or the DPO at the contact details above.

Furthermore, the Supplier has the right to lodge a complaint with the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)), if it considers that its rights under the GDPR have been violated.