

Information pursuant to articles 13-14 of European Regulation 2016/679 (GDPR - General Data Protection Regulation)

INFORMATION ON SUPPLIERS, POTENTIAL SUPPLIERS, SUBCONTRACTORS, BUSINESS PARTNERS

Dear Interested Party,

pursuant to European Regulation (EU) 2016/679 ("GDPR"), we inform you that IMEMONT, in the qualification phase of its suppliers, (as defined below) therefore during offer comparisons and in execution of controls or verifications, including compliance, which are carried out by virtue of internal company procedures and, again, in the phase of pre-contractual negotiations and during the execution of a contract (hereinafter for brevity, the relationship with Suppliers, including potential ones, only "Commercial Relationship") with suppliers, potential suppliers, subcontractors, partners (hereinafter "Commercial Partner"), processes personal data ("Data") concerning: a) the legal representative(s) of the administrative body/the data controller; b) employees/collaborators; c) where applicable, the members/shareholders who are natural persons and beneficial owners; d) other decision-making figures (hereinafter, all the aforementioned categories of subjects, only "Data Subjects").

IMEMONT therefore provides Data Subjects with the following information.

DATA CONTROLLER. The Data Controller is: IMEMONT S.r.l. with legal and administrative headquarters in Urganano (BG), Via Provinciale 608, VAT 00866450166, in the person of Ing. Paolo Primavesi as Privacy Delegate.

IMEMONT S.R.L. with a single shareholder

Legal, administrative and operational headquarters Via Provinciale 608 - 24059 Urganano (BG) **Tel.** +39 035 4814 211

Operational headquarters Via della Giardina, 5 - 20900 Monza (MB) **Tel.** +39 039 2783 045

E-mail info@imemont.it **PEC** imemont_srl@pec.it **Web** www.imemont.it

Share capital € 185.760,00 fully paid up | **VAT N.** 00866450166 | **REA Bergamo** N.179863 | **SOA** N. 74225/10/00 | **SDI CODE** DXEBYTP

Subject to the direction and coordination of Col Giovanni Paolo Sp.A. - Art. 2497 bis c.c.

PURPOSES OF PROCESSING, CATEGORIES OF DATA PROCESSED AND LEGAL BASIS.

PURPOSES OF THE PROCESSING	CATEGORIES OF PROCESSED DATA	LEGAL BASIS OF THE PROCESSING
1. Qualification and selection phase (comparison of offers/controls and checks on potential suppliers/subcontractors/business partners)		
<p>In the phase prior to pre-contractual negotiations, the Data are processed in order to carry out bid comparisons and/or the execution of checks or verifications by virtue of internal company procedures (e.g. controls for ISO 9001 supplier qualification and anti-corruption due diligence).</p>	<p>For this purpose, Data of the legal representative/ members of the administrative body/ owner of the Business Partner are processed, as well as any data of the shareholders/shareholders who are natural persons and other decision-making figures of the Business Partner, as well as any Data of third parties, consisting of Personal Data of a common nature (such as, for example, identification and contact data, data relating to the role/task, any appointments of official/former public official, economic-financial information, anti-mafia declarations, etc.).</p>	<p>The processing of Data is necessary for the pursuit of the legitimate interest of the Data Controller, pursuant to Article 6, paragraph 1, letter f), GDPR, represented by the need to identify on the market the most suitable Supplier/Subcontractor/Business Partner to meet the needs of the Companies, in accordance with the standards provided for by the company's internal procedures, and to carry out the checks required by the same. The acquisition of data pursuant to Article 10 of the GDPR takes place pursuant to Article 2 octies, paragraph 3, letters h and i. of the Privacy Code.</p>
2. Pre-contractual and contractual phase		
<p>The Data are processed in order to conduct pre-contractual negotiations, as well as to establish and execute the Commercial Relationship and manage all related obligations (e.g. order management, accounting and commercial correspondence, management of obligations regarding safety at work pursuant to Legislative Decree 81/2008 for subcontracts), as well as for the verification of the identity and/or suitability of the subjects who access the facilities of the Data Controller's Customers as required by current legislation and/or contractual agreements (for subcontractors).</p>	<p>To this end, Data of the legal representative/members of the administrative body/owner of the Supplier, as well as Data of the latter's employees/collaborators, consisting of Personal Data of a common and particular nature (e.g. identification and contact data, data relating to the role/task performed, Unilav, training certificates, LUL, data relating to qualifications, licences, data on suitability for the job, etc.) are processed.</p>	<p>The processing of Data is necessary, as the case may be:</p> <p>i) for the performance of a contract to which the data subject is a party or for the execution of pre-contractual measures adopted at the request of the same (art. 6, par. 1, letter b), GDPR);</p> <p>or, ii) to comply with a legal obligation (Art. 6, para. 1, lit. c), GDPR (e.g. tax obligations).</p>

IMEMONT S.R.L. with a single shareholder

Legal, administrative and operational headquarters Via Provinciale 608 - 24059 Urgnano (BG) **Tel.** +39 035 4814 211
Operational headquarters Via della Giardina, 5 - 20900 Monza (MB) **Tel.** +39 039 2783 045
E-mail info@imemont.it **PEC** imemont_srl@pec.it **Web** www.imemont.it

Share capital € 185.760,00 fully paid up | **VAT N.** 00866450166 | **REA Bergamo** N.179863 | **SOA** N. 74225/10/00 | **SDI CODE** DXEBYTP
Subject to the direction and coordination of Col Giovanni Paolo S.p.A. - Art. 2497 bis c.c.



3. Litigation phase – possible		
Where necessary, the Data may be processed to exercise or defend a right of the Data Controller in relation to the Commercial Relationship.	To this end, Data of the legal representative/members of the administrative body/owner of the Business Partner are processed, as well as Data of the latter's employees/collaborators, consisting of Personal Data of a common nature (e.g. identification and contact data, data relating to the role/task performed).	The processing of Data is necessary for the pursuit of the legitimate interest of the Data Controller, in or out of court.

RETENTION PERIOD OF YOUR PERSONAL DATA. The Data processed in the Selection phase (i.e. in the phase of comparison of offers, control and verifications) will be kept for the time strictly necessary to achieve the specific purpose for which they were collected, in compliance with the company's internal procedures. The Data processed following the closure of the Selection and for pre-contractual purposes are kept for a period of 10 years from the closure of the Selection and, in the event of the establishment of the Commercial Relationship, for its entire duration and for ten years following its termination, in accordance with current civil and tax legislation. After the expiry of the storage terms indicated above, the Data will be destroyed or made anonymous.

Retention periods other than those indicated above may be determined by specific legal provisions, by legitimate requests/orders of the Authorities or by the participation of the Data Controller in legal proceedings involving the processing of Data.

METHODS OF PROCESSING. The processing of Data is carried out using paper and telematic methods in compliance with the provisions on the protection of personal data and, in particular, with the technical and organizational measures referred to in Article 32.1 of the GDPR, which guarantee their integrity, confidentiality and availability. The processing referred to in this Policy is not subject to automated decision-making processes.

CATEGORIES OF DATA RECIPIENTS. The data are not disseminated, except where required by a law or regulation or by EU legislation.

The data are processed within the Company by authorised parties (employees and collaborators), who have received specific operating instructions.

The Data may be known by parties external to the Company who process the Data on behalf of the latter and in their capacity as Data Processors (e.g. professionals or companies providing tax accounting assistance, electronic invoicing, business administration and management, data processing, information, telematic and telecommunications services, hosting data processing and IT services companies) or who are entitled to know them as independent data controllers (e.g. credit, banking, insurance institutions, legal advisors) or, again, authorised to process data (e.g. members of the Supervisory Body) or certification bodies (e.g. in the case of ISO audits) as well as transmitted or communicated to public administrations for the fulfilment of obligations provided for by law, regulations or European legislation.

IMEMONT S.R.L. with a single shareholder

We inform you that the updated list of external Data Processors appointed pursuant to art. 28 GDPR is kept at the Data Controller and can be consulted at the request of the Data Subject.

With regard to subcontractors, personal data and certain types of documents (by way of example but not limited to: identity document, tax code, UNILAV, LUL, training certificates, etc.) relating to the operators who access the Data Controller's Customers, may be communicated to the latter, at their request, for the further purposes of the case.

The complete and up-to-date list of recipients is available upon request.

The data will not be disseminated.

SOURCE FROM WHICH THE DATA ORIGINATE AND NATURE OF THE PROVISION. The data are provided by the Supplier or provided directly by the Data Subjects. Please note, however, that some Data may also be found by the Data Controller on public databases, search engines or portals.

The provision of data for the achievement of the aforementioned purposes is mandatory as it is necessary for the fulfilment of contractual obligations or a necessary requirement for the conclusion of the Contract as well as legal obligations. The provision of Data is optional in order to carry out all the preliminary activities (e.g. Qualification and Selection of the Supplier). Refusal to provide them will therefore make it impossible to evaluate, establish or execute the Business Relationship.

DATA TRANSFER. The data is stored on servers and storage tools located within the European Union. In any case, it is understood that the Data Controller, if necessary, reserves the right to use cloud services from suppliers in countries outside the European Union or the European Economic Area. In this case, the transfer of data will take place exclusively to suppliers operating in countries deemed adequate pursuant to art. 45, who have adhered to the EU-US Privacy Framework or who have provided the guarantees provided for by art. 46 GDPR.

You can obtain more information on the transfer and/or copy of the guarantees applied by contacting the Data Controller.

RIGHTS OF THE DATA SUBJECT. The interested party may at any time exercise the rights provided for in Articles 15-22 of the GDPR. In particular, request access to your personal data, rectification or deletion, request the limitation of processing, the portability of data to another Data Controller.

The data subject also has the right to object to the processing of data based on the legitimate interest of the Data Controller and to lodge a complaint with the Data Protection Authority, if he/she considers that the processing of his/her data does not comply with the principles of the GDPR (art. 77 GDPR).

You can exercise the rights indicated above by sending an e-mail to privacy_imemont@imemont.it.

The exercise of the rights of the data subject may be delayed, limited or excluded in the cases provided for by art. 2-undecies of Legislative Decree 196/2003 (Privacy Code).

IMEMONT S.R.L. with a single shareholder

Legal, administrative and operational headquarters Via Provinciale 608 - 24059 Urgnano (BG) **Tel.** +39 035 4814 211
Operational headquarters Via della Giardina, 5 - 20900 Monza (MB) **Tel.** +39 039 2783 045
E-mail info@imemont.it **PEC** imemont_srl@pec.it **Web** www.imemont.it

Share capital € 185.760,00 fully paid up | **VAT N.** 00866450166 | **REA Bergamo** N.179863 | **SOA** N. 74225/10/00 | **SDI CODE** DXEBYTP
Subject to the direction and coordination of Col Giovanni Paolo S.p.A. - Art. 2497 bis c.c.