INFORMATIVE FOR THE PROCESSING OF PERSONAL DATA OF CUSTOMERS AND SUPPLIERS

EU Regulation no. 2016/679

Dear Customer/Supplier

SUBJECT: information pursuant to art. 13 and 14 of EU Regulation no. 2016/679 (hereinafter "**GDPR**"), relating to the protection of the processing of personal data collected from the interested party.

1. DATA CONTROLLER

The data controller is Speich S.r.l. (hereinafter the "Data Controller") with registered office in Via Gelasio Adamoli 443 - 16141 Genoa, VAT number IT01121240103, Tel. +39 010 8380676, PEC: posta@pec.speich.com .

2. DATA PROCESSOR

In the case of Speich S.r.l. the appointment of the person in charge of the processing of personal data (hereinafter "RTD") is not mandatory, as the activity does not fall within the cases specified in Article 37 of Reg. EU 2016/679. However, taking into account the WP243 guideline, an RTD was appointed on a voluntary basis. Below is the contact of the designated RTD:
Tel. +39 010 8380676 Ext 219, E-mail: privacy@speich.com .

3. LEGAL BASIS, PURPOSE AND OBLIGATION OF THE PROCESSING

The Data Controller processes the personal data communicated by you in the context of the contractual relationship in a lawful manner and correctly in the following ways:

a. without your express consent (art. 6 GDPR) for the following purposes:
   - fulfill the pre-contractual, contractual and tax obligations deriving from the relationship with you in place;
   - fulfill the obligations established by law: invoicing, accounting records and records;
   - exercise the rights of the Data Controller, in particular that of defense in court;

b. with your express written consent (art. 7 GDPR) for the following purposes:
   - management of questionnaires aimed at the degree of customer satisfaction and the qualification of suppliers;
   - organization of events, meetings, conferences, seminars also aimed at professional training.

The data processed are updated, relevant, complete and not excessive with respect to the purposes listed above for which they are collected and subsequently processed.

4. PROCESSING METHODS

The processing of your personal data is carried out by means of the operations indicated in art. 4 Privacy Code and art. 4 n. 2) GDPR and precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.
The Data are not processed with automated decision-making processes. The processing of data takes place with tools (paper, computer or telematic) suitable to guarantee security and confidentiality according to the so-called "Data Processing". *data protection by default*, i.e. the application of measures to minimize the risks of data dissemination.

5. RECIPIENTS OF PERSONAL DATA

Personal Data are processed, in addition to the personnel appointed by the Data Controller, also by the following subjects:

- A transport and logistics companies (in execution of contractual obligations).
- Tax, legal and labour consultant
- Consultants for specific areas (administration of IT systems)
- Control bodies, including as a result of inspections or audits.

The names of the subjects listed above are available at any time upon request to the RTD.

6. TRANSFER OF PERSONAL DATA TO INTERNATIONAL COUNTRIES OR ORGANIZATIONS

There is no provision for the transfer of personal data outside the European Community or to international organizations.

7. DATA RETENTION TIMES

Your personal data will be kept for nr. 10 (ten) years, from the termination of the relationship.

8. RIGHTS OF THE INTERESTED PARTY

You can exercise the rights (art. 7 Privacy Code and ss and art. 15-16-17-18-19-20-21 of the GDPR), indicated therein and in particular:

- right of access, i.e. the right to obtain from the Company confirmation as to whether or not the Data is being processed and, in this case, to obtain access to it;
- right of rectification and cancellation, i.e. the right to obtain the correction of inaccurate Data and / or the integration of incomplete Data or the cancellation of Data for legitimate reasons;
- the right to restriction of processing, i.e. the right to request the suspension of processing if there are legitimate reasons;
- the right to data portability, i.e. the right to receive the Data in a structured, commonly used and readable format, as well as the right to transmit the Data to another data controller;
- right to object, i.e. the right to object to the processing of Data if there are legitimate reasons, including the processing of Data for marketing and profiling purposes, if provided;
- right to contact the competent data protection authority in the event of unlawful processing of data.

9. HOW TO EXERCISE YOUR RIGHTS

You may exercise these rights by sending a PEC to Speich S.r.l. - Via Gelasio Adamoli 443 - 16141 Genova, P.I. IT01121240103 at the address: posta@pec.speich.com

Genoa, 24th May 2018

EXPRESSION OF CONSENT FOR THE PROCESSING OF DATA

(Art. 7 EU Regulation no. 2016/679)

SUBJECT: Information for customers and suppliers	
Do you allow the processing of your personal identification data in the manner and for the purposes indicated in the information in question?	
☐ **I allow**	☐ **I do not allow**
Do you allow the communication of your data limited to the recipients specified in the information in question?	
☐ **I allow**	☐ **I do not allow**

By signing this I declare that I have carefully read the content of the information in question provided by you pursuant to Art. 14-15 of EU Regulation nr. 679/2016.

Place:
Data:

Company: _____

Surname: _____ Name: _____

Company _____