



## **PRIVACY INFORMATION NOTICE PURSUANT TO ARTICLE 13 OF THE REGULATION EU 2016/679**

### **Data Subjects: Customers and Suppliers.**

Opocrin S.p.A. (“Opocrin” or “Controller”), pursuant to Regulation EU 2016/679 on the protection of natural persons with regard to the processing of personal data (“GDPR”), in its capacity of Data Controller, hereby informs you that your personal data will be processed in accordance with the principles of lawfulness, fairness, transparency and any other principles set forth in art. 5 of the GDPR, as well as in compliance with the requirements of the EU regulation and national laws on protection of personal data.

### **PERSONAL DATA PROCESSED**

For the purposes specified in this Privacy Information Notice, the Controller will process the following personal data (“Personal Data”): identifying and contact data (name, surname and email address) concerning your employees or collaborators, as well as any personal data of which Opocrin will become aware, also indirectly, under the commercial relationship.

### **PURPOSES AND LEGAL BASIS FOR DATA PROCESSING, NATURE OF DATA CONVEYANCE AND CONSEQUENCES IN THE CASE OF REFUSAL**

Your Personal Data shall be processed for the following purposes connected to the performance of the contract or the implementation of pre-contractual measures under a relationship (article 6, paragraph 1, letter b of the GDPR):

- execution, management and performance of the contract as well as of any previous, related or connected activity;
- compliance with the obligations provided for in the contract or by law which is applicable in the field of quality management, transport, hygiene and health and safety at work.

Furthermore, your Personal Data shall be processed for the following purposes connected to the compliance with legal obligation to which the Controller is subject (article 6, paragraph 1, letter c of the GDPR):

fulfilment of legal obligations in the tax and accounting field.

Your Personal Data shall be processed also for the purpose of the legitimate interest pursued by the Controller (article 6, paragraph 1, let. f of the GDPR):

handling of potential claim or litigation.

In relation to the above-mentioned purposes, the conveyance of Personal Data is mandatory.

The failure to convey any of the Personal Data can make impossible for Opocrin to execute or perform correctly the contract.

### **PROCESSING**

Your Personal Data will be processed in one of the following ways:

- processing through electronic computers, including the use of software systems developed by a Third Party;
- manual processing through paper archives.

Any processing will be carried out by means of the operations specified in the article 4, paragraph 1, no. 2) of the GDPR and by adopting the appropriate security measures, in compliance with the provisions of articles 6 and 32 of the GDPR.

## **PERSONS AUTHORISED TO PROCESS, CATEGORIES OF RECIPIENTS AND SCOPE OF DATA COMMUNICATION**

Only if strictly necessary to the above-mentioned purposes of data conveyance, your Personal Data may be made available to specific Recipients in order to ensure the security, integrity and confidentiality of your Personal Data as well as the protection of your rights.

Your Personal Data may be processed by persons internally authorized by Opocrin to process these Data, due to own specific functions they perform, and in particular:

- Accountability Department;
- Purchasing Department;
- Sales Department;
- Quality Department.

Your Personal Data may be processed by or communicated to external parties to whom transmission of the Personal Data may become necessary (in their capacity of Processor specifically designated or independent Data Controller), in particular to the following categories of Recipients:

- banks and credit institutes;
- consultants and freelancers, also acting in partnership;
- logistics operators, shippers and transporter;
- public and/or private subjects for whom the transmission of data is mandatory or necessary in compliance with legal obligations or is in any case functional to the handling of the contract.

Such Recipients, should they be processing data on behalf of the Controller, will be designated as parties responsible for the processing (Processor) with a specific contract or other legal document.

Exhaustive and updated list of the Processors appointed to process Personal Data may be required to the Controller by contacting him at the contact details set out in this Privacy Information Notice.

## **DISSEMINATION AND TRANSMISSION OF DATA TO A THIRD-PARTY COUNTRY**

Your Personal Data will not be disseminated in any way.

Your Personal Data will not be transferred to a third-party Country.

## **LENGTH OF DATA STORAGE PERIOD**

In accordance with the principles of lawfulness, purpose limitation and data minimisation, pursuant to article 5 of the GDPR, the length of Personal Data storage period is:

the time strictly necessary to fulfil the contract and the tax and accounting obligations.

In any case, as these Personal Data are processed for the fulfil of the contract, Controller may continue to store this Personal Data for a longer period, as may be necessary to protect Opocrin's interests related to potential liability related to the performance of the contract or the implementation of pre-contractual measures.

## **IDENTITY AND CONTACT DETAILS OF THE CONTROLLER**

For any issue concerning the processing of Personal Data and to exercise the rights specified below, the Data Subjects may contact Opocrin S.p.A., in its capacity of Data Controller (with registered office at Via

Pacinotti, 9, Corlo di Formigine (MO), Italy, Fiscal Code and VAT no. 00156140360; email: [privacy@opocrin.it](mailto:privacy@opocrin.it); phone: +39 059 558352), in the person of legal representative *pro tempore*.

#### **RIGHTS OF THE DATA SUBJECT (ARTICLES 15 – 22 OF THE GDPR)**

The Data Subject is entitled to exercise at any time the rights provided for in the articles 15–22 of the GDPR, including the right to obtain from the Controller confirmation of whether or not personal data concerning him exists, even if not registered, and its disclosure in intelligible form, and also access to the personal data (by obtaining a copy) and the related information (including the purposes of processing, the categories and origin, etc.) and oppose it for reasons related to their own special situation or for direct marketing purposes.

The Data Subject also has the right to ask the Controller for correct the personal data if incorrect, delete them or restrict their processing, when applicable, and obtain the conversion into anonymous form and the portability of the supplied data, as well as to file a complaint with the relevant oversight authority, the Guarantor for the Protection of Personal Data.