


DATA CONTROLLER	DOCUMENT	REF. LAW
 <p>Somet S.p.A. Via Enrico Schievano, 7 20143 Milan (MI)</p>	<p>PRIVACY POLICY regarding the processing of personal data of customers/suppliers and their contacts</p>	<p>Reg. EU 2016/679 - GDPR General Data Protection Regulation Art. 12, 13, 14</p>

GENERAL INFORMATION

We inform customers/suppliers (data subjects of the processing) and their contacts (hereinafter "data subjects" as per Art. 4, para. 1 of the GDPR) that the professional relationships established with the undersigned Data Controller may involve the processing of personal data **according to the following general principles**:

- All data are processed in a lawful, proper and transparent manner in relation to the data subject, in compliance with the general principles established by Art. 5 of the GDPR.
- Specific security measures are implemented to prevent data loss, illicit or improper use and unauthorised access.
- The Data Controller is Sommet S.p.A., Via Enrico Schievano 7 – 20143 Milan (MI).
- It is possible to contact the Data Controller to exercise all the rights provided for by art. 15-21 of the GDPR (right of access, rectification, erasure, restriction, portability, objection), as well as to withdraw consent previously given or to lodge a complaint with the Personal Data Protection Authority.

OBJECT OF THE PROCESSING

The Data Controller processes personal identification information of the customer/supplier (for example name, surname, company name, personal/tax information, address, telephone, email address, bank and payment details) and its operational contact persons (name, surname and contact information) acquired and used in the provision of services offered by the Data Controller.

PURPOSES AND LEGAL BASIS OF THE PROCESSING

Data are processed to:

- Establish contractual/professional relationships.
- Fulfil pre-contractual, contractual and tax obligations deriving from existing relationships, as well as to manage the necessary communications related to them.
- Fulfil the obligations established by law, a regulation, other European legislation or an order of the Authority.
- Exercise a legitimate interest as well as a right of the Data Controller (for example: the right to defend itself in court, collection of outstanding payments, ordinary internal needs of an operational, managerial and accounting nature).

Failure to provide the aforementioned data will make it impossible to establish a relationship with the Data Controller. Pursuant to article 6, paragraphs b, c and f, the aforementioned purposes represent suitable legal bases for the lawfulness of the processing. If it is decided to process personal data for other purposes, specific consent will be required of the data subjects.

METHODS OF PROCESSING

The processing of personal data is carried out by means of the operations specified in art. 4, no. 2) of the GDPR, and precisely: collection, recording, organisation, storage, consultation, processing, alteration, selection, retrieval, alignment, use, combination, blocking, disclosure, erasure and destruction of the data. Personal data are subjected to both paper and electronic and/or automated processing. The Data Controller will process the personal data for the time necessary to fulfil the purposes for which it was collected and for related legal obligations.

SCOPE OF THE PROCESSING

The data are processed by internal parties who have been duly authorised and instructed pursuant to art. 29 of the GDPR. It is also possible to request the scope of the personal data's disclosure, receiving precise details of any external parties operating as independent Processors or Data Controllers (consultants, technicians, banks, shippers, etc.). We also inform you that personal data may be the subject of intercompany communication between Group companies. The data are not subject to dissemination or transfer to non-EU countries. If it becomes necessary in the context of tenders/contracts or the fulfilment of regulatory obligations (e.g. joint liability, anti-corruption, anti-Mafia, anti-money laundering, etc.) to acquire the personal data of employees of customers/suppliers, the parties agree that this company will be authorised to carry out processing as an external Processor (art. 28 of the GDPR) or authorised party (art. 29 of the GDPR). As part of this relationship, this company commits to process such data in compliance with the requirements established by the GDPR, guaranteeing that any disclosure to other parties will be made solely as required by specific legal obligations.