

INFORMATION LETTER ON THE PROCESSING OF PERSONAL DATA

(art. 13 and 14 Reg. UE 2016/679 and Legislative Decree 196/2003 and subsequent amendments)

Dear,

Below we provide you with some information that you need to bring to your attention, not only to comply with legal obligations, but also because transparency and fairness towards interested parties are a fundamental part of our activity.

Who is the data controller?

The Data Controller of your personal data, responsible towards you for the legitimate and correct use of your personal data, is **PALLADIO GROUP**, in the person of the parent company Palladio Group S.p.A. (identified according to the definition of "entrepreneurial group" set out in art. 4.19 of EU Regulation 679/2016), which you can contact for any information or request at the following **addresses**:

Head office	Via Cresole n. 8, 36031 Dueville (VI), IT
Telephone	+39 0444 947111
E-mail	info@palladiogroup.com
Web site	www.palladiogroup.com

Who is the Data Protection Officer?

The data controller has appointed a Data Protection Officer (DPO) who can be contacted at the following address:

E-mail	dpo@palladiogroup.com
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Where are the data collected?

Your data is communicated by you and/or by third parties, such as other suppliers or customers and/or collected from sources accessible to the public.

Is there an obligation to provide data?

Except for purposes based on consent, the provision of your data is a necessary requirement: failure to provide the data indicated as mandatory could lead to legal and contractual consequences while failure to provide the data indicated as optional could make it impossible to carry out the processing or lead to a partial processing thereof. Therefore, in case of failure to provide them, you may not obtain the expected result or obtain it only partially.

For what purposes are the data collected and processed?

The Data Controller collects and processes your personal data using automated, semi-automated and non-automated methods for purposes related to the management of relationships with suppliers and their contact persons, which is lawful on the basis of the execution of the contract, a legal obligation or legitimate interest of the data controller or third parties. The table below shows the data processing analytically with details on the purpose, legal basis, type of data, specific recipients and retention terms.

To whom are the data communicated?

As part of the processing activities, your data may be communicated to:

- authorized subjects, as identified in the specific register kept by the Data controller, therefore employees and other internal subjects,
- external parties who process the data on behalf of the Data Controller, duly instructed and bound through contracts of appointment as data processor (as identified in the specific register kept by the data controller),
- other organizations belonging to the entrepreneurial group,
- public authorities at their request or due to communication obligations incumbent on the data controller,
- other subjects for whom the communication of data is necessary for carrying out the declared purposes of the

data controller, as per the specifications for each processing in the table below.

How is the data stored?

Your personal data is stored securely in compliance with the cancellation terms identified and reported below. However, consider that the data may be retained for the time necessary for the statute of limitations to accrue in relation to mutual rights and the retention time of backups.

Are the data subject to transfer?

The processing of personal data (e.g. storage, archiving and conservation of data on its own servers or in the cloud) is limited to the areas of circulation and processing of personal data in countries belonging to the European Union, with an express prohibition on transferring them to countries non-EU which do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protection instruments provided for by EU Regulation 2016/679 (third country deemed adequate by the European Commission, group BCR, model contractual clauses, consensus of interested parties, etc.). You can request more information by contacting the data controller.

What rights can be exercised?

You have the right to ask the data controller for access to your personal data and for the rectification, cancellation and portability of the same or the limitation of the processing that concerns you or to oppose their processing. If you have provided consent for one or more specific purposes, you have the right to revoke this consent at any time, without prejudice to the lawfulness of the processing based on the consent given before the revocation. You also have the right to lodge a complaint with the following Supervisory Authority: Guarantor for the protection of personal data, with headquarters in Piazza Venezia 11, 00187 – Rome – protocollo@pec.gdpd.it. To exercise your rights or to request additional information, you can contact the data controller via the contact information above..

Can the information in this policy change?

The Data Controller may update this information on personal data in accordance with applicable laws. Any changes will be communicated appropriately and the update date will always be visible in the information. It is suggested that you regularly check the information and, if necessary, request an updated copy from the Data Controller.

Tab. A

What specific data processing is carried out?

Processing	Planning and Control of Activities
Purpose	Scheduling of activities
Legal Basis	Article 6, par. 1, letter f): Pursuit of the Data Controller's legitimate interest in efficient company organisation
Data processed	Common data (in particular: Personal data Data relating to identification codes Contact details Address data Data relating to purchases or use of services Data relating to work activity (role held in the company, CV, performance, professional quality certificates, ...) Economic, commercial, financial and insurance activities)
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller

Storage	10 years from the year the data was collected
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Processing	Procurement
Purpose	Procurement of goods and services
Legal Basis	Article 6, par. 1, letter b): Execution of the contract or pre-contractual measures
Data processed	Common data (in particular: Personal data Data relating to identification codes Contact data Address data Data relating to purchases or use of services Economic, commercial, financial and insurance activities)
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller
Storage	10 years from the year of competence

Processing	Management Control
Purpose	Internal control of company management;
Legal Basis	Article 6, par. 1, letter f): Pursuit of the Data Controller's legitimate interest in verifying the good conduct of the business activity
Data processed	Common data (in particular: Personal data Contact details Address data Data relating to work activity (role held in the company, CV, performance, professional quality certificates, ...) Staff salary data Economic, commercial, financial and insurance activities
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller
Storage	10 years from the year of competence

Processing	Acceptance
Purpose	Goods acceptance
Legal Basis	Article 6, par. 1, letter b): Execution of the contract or pre-contractual measures
Data processed	Common data (in particular: Personal data Contact data Address data)
Specific recipients	The data will not be disclosed to any recipient
Storage	10 years from the year of competence

Processing	Suppliers Management
Purpose	Suppliers Management
Legal Basis	Article 6, par. 1, letter b): Execution of the contract or pre-contractual measures
Data processed	Common data (in particular: Personal data Data relating to identification codes Contact details Address data Payment details Data relating to purchases or use of services Economic, commercial, financial and insurance activities
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller, including banks and credit institutions
Storage	10 years from the year of termination of the last contract

Processing	Accounting
Purpose	Accounting record keeping; Tax obligations
Legal Basis	Article 6, par. 1, letter c): Fulfillment of a legal obligation
Data processed	Common data (in particular: Personal data Data relating to identification codes Contact details Address data Payment details Salary data economic, commercial, financial and insurance activities
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller, including banks and credit institutions
Storage	10 years from the year of competence

Processing	Quality
Purpose	Verification of the quality of goods and services
Legal Basis	Article 6, par. 1, letter f): Pursuit of the Data Controller's legitimate interest in the continuous improvement of the activity also by verifying compliance with the procedures
Data processed	Common data (in particular: Personal data Data relating to identification codes Contact data Address data Quality certificates of products;
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller, including certification and accreditation bodies.
Storage	10 years from the year of data collection

Processing	Reception
Purpose	Monitoring of people entering the company; Filtering of phone calls; Documentation sorting
Legal Basis	Article 6, par. 1, letter. f): Pursuit of the Data Controller's legitimate interest in the protection of company assets/worker safety/for organizational and production needs
Data processed	Common data (in particular: Personal data Data relating to identification codes Contact data Address data Data relating to work activity (role held in the company, CV, performance, professional quality certificates, ...)
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller
Storage	1 year from the year of obtaining data

Processing	Technical assistance also with the use of augmented reality
Purpose	Technical assistance also with the use of augmented reality
Legal Basis	Legitimate interest of the data controller
Data processed	Common data (in particular: Photo, audio-video registrations Personal data Contact data Data relating to work activity (role held in the company, CV, performance, professional quality certificates, ...)
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller
Storage	functionally linked to the duration of the assistance interventions

Processing	IT systems management and maintenance
Purpose	Management and maintenance of the network and IT systems
Legal Basis	Art. 6, par. 1, letter f): Pursuit of legitimate interest of the Data Controller Article 6, par. 1, letter c): Fulfillment of a legal obligation limited to the provisions of the legislation regarding system administrators
Data processed	Common data (in particular: Personal data Contact details Data relating to the provision of an electronic communications service (traffic data, data relating to internet browsing, other...) Access and identification data (username, password, customer ID, other...)
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller
Storage	10 years from the year of termination of the contractual relationship for accounts, passwords and user names; 18 months with regards to obligations regarding system administrators;

Processing	Defense of the interests and rights of the Data Controller
Purpose	Prevent and/or detect any abuse and defend the rights and interests of the Data Controller
Legal Basis	Art. 6, par. 1, lett. f): Pursuit of legitimate interest of the Data Controller to protect its rights and interests in court or in the preparatory phases for its possible establishment Art. 9, par. 1, letter f): ascertainment, exercise or defense of a right in court
Data processed	Common data, special categories of data and judicial data (in particular: Data useful for the defense of the interests and rights of the Data Controller)
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller, including legal ones
Storage	The data will be stored as long as the Data Controller has an interest in exercising his own right or interest

Processing	Management of obligations regarding personal data protection
Purpose	Obligations regarding the protection of personal data
Legal Basis	Article 6, par. 1, letter c): Fulfillment of a legal obligation
Data processed	Common data and special categories of personal data
Specific recipients	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller, including public authorities
Storage	10 years from the year of cessation of the effects of the contract or from the last request

Last update: 16/09/2024