

Information notice for service providers

This document was drawn up pursuant to art. 13 of EU Regulation 2016/679 (hereinafter referred to as “GDPR”) in order to inform you about our privacy policy with regards to the processing of your personal information (including, but not limited to, your name, surname, mobile phone number, e-mail address and in general the contact information of your contact points), that are collected in the course of the performance of the contract concluded between your company and Register S.p.A. (hereinafter “Register”) with registered office in Viale della Giovine Italia 17, Florence, ZIP code 50122, Italy.

According to the rules of the GDPR, the processing carried out by Register will be based on the principles of lawfulness, correctness, transparency, purpose and storage limitation, data minimisation, accuracy, integrity and confidentiality.

The Data Controller of the personal data is Register, as defined above. For any information regarding the processing of the personal data by Register, please write to the following e-mail address: dpo@register.it.

Register, as Controller of the personal data collected, informs you of the following.

The processing that Register intends to carry out has the following purposes:

1. purposes of management and performance of the contract between your company and Register;
2. fulfilment of any legal, accounting and tax obligations;
3. evaluating the reliability of its suppliers, in particular by ascertaining the absence of criminal proceedings or convictions, as well as the absence of causes referred to in Italian anti-mafia legislation (art. 67 of Legislative Decree no. 159/2011).

The legal basis of the processing of your personal data are as follows:

- for the purposes referred to in point 1, the legal basis is provided by art. 6(1)(b) GDPR (“...*processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;*”), since the processing of your data enables the company and Register to perform the contract they have concluded. The provision of your personal data for this purpose is optional, but failure to provide them could make it impossible for Register to execute the contract or provide the services concerned;
- the purpose referred to in point 2 represents the legitimate processing of your personal data pursuant to art. 6(1)(c) GDPR. Once your personal data has been provided, the processing may indeed be necessary to comply with legal obligations to which Register is subject;
- the purpose referred to in point 3 is based on the legitimate interest of Register to assess the reliability of its suppliers..

Your personal data may be shared, for above mentioned purposes, with:

1. subjects who typically act as data processors, i.e.: i) persons, companies or professional firms that provide assistance and advice to Register in accounting, administrative, legal, tax, financial and debt recovery matters;
2. subjects, bodies or authorities to whom it is obligatory to communicate your personal data pursuant to legal provisions or orders of the authorities;
3. natural persons authorised by Register to process your personal data necessary to carry out activities strictly related to the performance of the contract, who are committed to confidentiality or have an adequate legal obligation of confidentiality (e.g. employees and/or external collaborators of Register).

Your personal data will be processed both automatically and manually. Your personal data will not be disclosed in any case.

Some of your personal Data are shared with Recipients who may be located outside the European Economic Area. Register ensures that your personal data are processed by these recipients in accordance with the GDPR. Indeed, transfers can be based on an adequacy decision or on the Standard Contractual Clauses

approved by the European Commission. For further information, please send a written request to dpo@register.it.

The personal data processed for the purposes referred to in point 1 will be retained for the period strictly necessary to achieve those purposes. In any case, since the processing is carried out for the performance of a contract, Register will process your personal data for the period allowed by Italian law for the purpose of protecting its interests (Art. 2946 et seq. of the Italian Civil Code).

The personal data processed for the purposes referred to in point 2 will be retained for the period required by the specific obligation or by applicable law.

The personal data processed for the purposes referred to in point 3. will be retained for five years, from the termination of the contractual relationship between your company and Register.

Further information regarding the retention period can be requested by writing to Register at the following e-mail address: dpo@register.it.

Pursuant to articles 15 et seq. GDPR, you shall have the right to request from Register, at any time, the access, rectification or erasure of your personal data. Furthermore, you shall have the right to request the limitation of the processing in the cases provided for by art. 18 GDPR, as well as the right to obtain your personal data in a structured, commonly used and machine-readable format in the cases provided for by art. 20 GDPR.

Requests should be sent in writing to Register at the following e-mail address: dpo@register.it.

In any case, you are always entitled to file a complaint with the competent Supervisory Authority (the Italian Data Protection Authority), pursuant to art. 77 GDPR, if you believe that the processing of your personal data violates applicable law, or to seek judicial redress through the appropriate courts (art. 79 GDPR).

This Privacy Policy has been effective since 10/12/2021. Register reserves the right to partly or fully amend or simply update its content, as a result also of changes in applicable law. If the changes to this policy concern substantial changes in processing activities or may have a significant impact on the data subjects, Register will notify them appropriately and in due time to the data subjects.