

## Privacy Policy

### Customer/Supplier

Dear Customer/Supplier,

pursuant to the current national legislation on privacy and in compliance with the provisions of the GDPR 2016/679 (General Data Protection Regulation), AXIANS ITALIA spa SB (hereinafter also referred to as "AXIANS") provides you with the information regarding the processing of your personal data, based on the principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

#### 1. Purposes of processing

With reference to these Data we inform you that:

- a) The data is processed in connection with contractual requirements and the consequent fulfillment of legal and contractual obligations arising therefrom as well as to achieve effective management of business relationships and also for the purpose of credit protection and better management of our rights relating to the individual business relationship.
- b) If you are already a customer, AXIANS may also use your data to send you advertising emails about products and services offered, similar to what you previously purchased, unless you refuse such use by exercising your right to object in the manner set forth below.
- c) In addition, the data may also be processed for the purpose of sending newsletters, commercial communications and/or promotional material, or opinion polls; the legal basis of the Data Controller is based on legitimate interest pursuant to Article 6(1)(f) GDPR, as well as, pursuant to Article 49(1)(a) GDPR, could be transferred to a third country outside the EU or to an international organization, if applicable (subject to a request for consent).

#### 2. Access to data

The Data may be made accessible for the purposes set out in art. 1:

- to employees and collaborators of the Data Controller or of the companies of the VINCI SA Group (in Italy and abroad), in their capacity as persons in charge of data processing and/or External Processor;
- to third party companies or other subjects (by way of example, credit institutes, professional studios, consultants, insurance companies for the provision of insurance services, control bodies, companies that may be responsible for the installation, maintenance, updating and, in general, the management of hardware and software etc.) that carry out outsourced activities on behalf of the Data Controller, where appropriate, appointed Data Processors pursuant to Art. 28 GDPR.

#### 3. Transfer of data to a third country and/or international organisation

We may need to transfer your Data to other group companies or service providers in countries outside the European Economic Area (EEA), consisting of the countries of the European Union and Switzerland, Liechtenstein, Norway and Iceland, which are considered countries with equivalent data protection and privacy laws.

In this case we will ensure that your data is properly and adequately protected.

If the country does not have equivalent data protection and privacy laws, we will require the third party to enter into a contract according to EEA standards.

#### 4. Method of processing and Retention period

The processing of personal data will be mainly carried out with the aid of electronic or otherwise automated means, in accordance with the methods and with the tools suitable to ensure the security and confidentiality of the data, in accordance with the provisions of current national legislation and the GDPR 2016/679. In particular, all technical,

IT, organisational, logistical and procedural security measures will be adopted, so that the minimum level of data protection required by law is guaranteed, allowing access only to the persons in charge of processing by the Data Controller or the Managers appointed by the Data Controller.

The Data will be processed for the time necessary to fulfil the purposes set out in point 1 and in any case for no longer than the legal term of 10 years from the termination of the relationship. After this term of conservation, the Data will be destroyed or made anonymous.

## **5. Nature of Provision and legal basis**

The conferment of the Data is compulsory for all that is required by legal and contractual obligations, and therefore any refusal to provide them or to their subsequent processing may make it impossible for the writer to continue the contractual relationship.

On the other hand, the failure to provide all the data that are not related to legal or contractual obligations will be evaluated from time to time by the writer and will determine the consequent decisions related to the importance of the data requested with respect to the management of the business relationship.

The legal basis of the Processing is the fulfillment of contractual or legal obligations related to the proper management of the relationship, for the purpose mentioned in point 1 letter a); legitimate interest for the purpose mentioned in point 1 letter b) and letter c); consent for the purpose of point 1 letter c) (with reference to the transfer of data to third countries outside the EU or to an international organization).

## **6. Rights of the interested party**

Pursuant to Article 15 of the GDPR and current national legislation on privacy, the interested party may exercise its rights, including consulting, modifying, deleting the data or opposing its processing for the purpose of sending advertising material or commercial communications or opinion polls, by sending an email to [dpo@axians.it](mailto:dpo@axians.it).

Where applicable, we also point out to you the rights under Articles 16-21 GDPR (Right to rectification, Right to be forgotten, Right to restriction of processing, Right to data portability, Right to object), as well as the right to complain to the Data Protection Authority.

In the case of a request for data portability, the Data Controller shall provide you with the personal data concerning you in a structured, commonly used and machine-readable format, without prejudice to paragraphs 3 and 4 of Article 20 of EU Reg. 2016/679.

## **7. Data Controller**

The Data Controller is AXIANS ITALIA spa SB, Via Gallarate 205, 20155 Milano, P.IVA 02341030241.

An updated and complete list of the Data Processors can be consulted at the Data Controller.

The Data Protection Officer ('DPO'), appointed by AXIANS, can be contacted at [dpo@axians.it](mailto:dpo@axians.it).