

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATED TO THE RELATIONSHIP WITH POTENTIAL SUPPLIERS AND SUPPLIERS**

The following information is intended for natural persons, including professionals, sole proprietorship owners, and representatives/contacts of companies, organizations, associations, and foundations, hereinafter "Data Subjects."

### **Identity and contact details of the Data Controller**

Fracarro Radioindustrie s.r.l., hereinafter also "Fracarro" or "Owner" with registered office in viale delle Querce, 9 – 31033 – Castelfranco Veneto (TV), and contactable at the e-mail address [info@fracarro.com](mailto:info@fracarro.com), to the PEC [fracarro@legalmail.it](mailto:fracarro@legalmail.it) or by calling 04237361.

### **Data categories and their source**

Fracarro processes common personal data (e.g., personal details, contact details, data relating to identification/recognition documents, data relating to work activity, including certificates and professional qualifications), special data (e.g., data relating to employment eligibility), and/or data relating to criminal convictions, offenses, and security measures. This information may be collected from the individual to whom it refers and/or from third parties (e.g., other company employees and collaborators or the Criminal Records Office).

### **Purposes and legal bases**

- A. Management of the pre-contractual phase:** personal data is processed for all needs related to obtaining information and/or quotes.
- B. Collection of commercial information:** personal data is processed to collect information for verification of the economic, financial and patrimonial situation of the interested parties, as well as their solidity, solvency and reliability.
- C. Management of the contractual phase:** personal data is processed for all needs related to the management of the contractual relationship in all its phases (e.g., managing appointments, organizing logistics, and fulfilling regulatory obligations imposed on the Data Controller).
- D. Defensive purposes:** The Data Controller may need to process personal data to manage out-of-court or judicial disputes and litigation.

Purpose	Legal basis (common data)	Legal basis (special data)
A.	Legitimate interest of the Data Controller related to carrying out research on potential suppliers and collecting information and/or quotes.	/
B.	Legitimate interest of the Data Controller related to the analysis and definition of business strategies and policies, the identification of suitable parties for initiating or continuing commercial relationships and payment methods and conditions, and the fight against fraud.	/
C.	Legitimate interest of the Data Controller to correctly carry out commercial relationships in compliance with applicable legislation; Execution of the contract; Fulfillment of legal obligations.	Fulfillment of obligations in matters of labor law.
D.	Legitimate interest of the Data Controller to ascertain, exercise or defend a right.	To ascertain, exercise or defend a right.

### **Retention period**

Purpose	Shelf life
A.	Time required to process requests and conduct subsequent discussions.
B.	Time needed to carry out the checks.
C.	10 years from the termination of the contract.
D.	10 years from the final resolution of the dispute.

### Nature of the provision and consequences in case of refusal

Purpose	Nature	Consequences
A.	Necessary	Inability to ask for and obtain the necessary information.
B.	Not applicable	/
C.	Necessary	Inability to initiate or continue the business relationship.
D.	Necessary	Inability to manage litigation.

### Scope of communication

The data is processed by internal personnel authorised for specific tasks and is communicated externally according to the following rules:

Purpose	Categories of external recipients
A.	External consultants.
B.	Business information company.
C.	Credit institutions, external consultants, entities to whom disclosure is required by law, commercial partners (customers/suppliers).
D.	Law firms; Judicial authorities.

Since the data is also processed using IT tools, it may also be visible to those who perform assistance/maintenance on such systems.

### Transfer of data to a third country or an international organisation

The Data Controller transfers personal data to the countries and under the conditions summarised below:

Purpose	Transfer Details
A.	The Data Controller uses information technologies provided by Google. Based on this choice, some personal data may be transferred to third-party countries outside of Europe. Transfers are lawful because they are carried out in third-party countries deemed adequate by the European Commission, or because Standard Contractual Clauses, adherence to the Data Privacy Framework, or other valid mechanisms are adopted. For further details on the position of sub-processors, the data subject can consult the following information page: <a href="https://cloud.google.com/terms/subprocessors">https://cloud.google.com/terms/subprocessors</a> .
B.	
C.	The Data Controller uses information technologies provided by Google. Based on this choice, some personal data may be transferred to third-party countries outside of Europe. Transfers are lawful because they are carried out in third-party countries deemed adequate by the European Commission, or because Standard Contractual Clauses, adherence to the Data Privacy Framework, or other valid mechanisms are adopted. For further details on the position of sub-processors, the data subject can consult the following information page: <a href="https://cloud.google.com/terms/subprocessors">https://cloud.google.com/terms/subprocessors</a> .
D.	

### Rights of the interested parties

The data subject is granted the following rights:

**Access:** you can find out whether your personal data is being processed and, if so, obtain access to it and request a copy.

**Correction** You can request that your personal data be updated, corrected (if inaccurate), or completed if incomplete.

**Cancellation:** it is possible to obtain the deletion of your personal data under certain conditions (for further information, contact the Data Controller).

**Limitation:** it is possible to request that the data be marked, so as to limit its processing in the future, under certain conditions (for further information, contact the Data Controller).

**Opposition** You may object to the processing of your personal data for reasons related to your particular situation, where the processing is based on legitimate interest or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

**Portability:** it is possible to receive the personal data provided to the Data Controller in a structured format and request to transmit them to another data controller if the processing is based on consent or a contract and is carried out by automated means.

**Revokes the consensus:** it is possible to revoke consent for the purposes that required it, without prejudice to the lawfulness of the processing carried out up to that point.

The specific rights that can be exercised with respect to the processing activities carried out are:

Purpose	Exerciseable right						
	Access	Correction	Cancellation	Limitation	Opposition	Portability	Revoke consent
A.	X	X	X	X	X		
B.	X	X	X	X	X		
C.	X	X	X	X	X	X	
D.	X	X	X	X	X		

To exercise the above rights, you can use the form available at the link <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and forward it to the following address: [privacy@fracarro.com](mailto:privacy@fracarro.com). The interested party may request further details regarding the information above (e.g., legitimate interest balancing test or the list of data controllers) at the same address.

It is possible to lodge a complaint with a supervisory authority: for Italy, the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) [www.garanteprivacy.it](http://www.garanteprivacy.it).