



PRIVACY-GDPR NOTICE FOR CUSTOMERS AND SUPPLIERS

pursuant to Articles 13 and 14 of EU Regulation 2016/679 on data protection ("GDPR")

Data Subjects: customers and suppliers, including potential ones (natural persons, business contacts and/or business representatives)

Processing of data relating to legal entities does not fall within the scope of personal data protection under the Regulation. For clarity and transparency toward its Customers and Suppliers, **ESSEGI SYSTEM SERVICE SRL** provides this notice also to legal entities, describing the methods and purposes of all processing activities the Company carries out or may carry out on personal data. This notice specifically concerns the data of natural persons representing or working for our customers and/or suppliers.

This document explains the methods and purposes of personal data processing carried out within the customer/supplier relationship with **ESSEGI SYSTEM SERVICE SRL** as well as any additional information required by law, including information on data subjects' rights. Processing will be carried out in full compliance with the provisions of (i) EU Regulation 2016/679 (hereinafter, the "GDPR"), (ii) Legislative Decree No. 196/2003, as last amended by Legislative Decree No. 101/2018 ("Privacy Code"), and (iii) the measures of the Italian Data Protection Authority (hereinafter collectively, the "Privacy Regulations"); such processing will also be based on principles of fairness, lawfulness, transparency, and protection of confidentiality and rights.

Personal data acquired or to be acquired in relation to contractual or pre-contractual relationships have been provided by the company (Customer/Supplier), and therefore directly by the data subjects during the course of activities between the parties.

Data Controller:

ESSEGI SYSTEM SERVICE SRL

represented by the *pro tempore* legal representative.

Registered office located in VIA ZAMBON no. 14/16,

36051 CREAZZO, VICENZA, ITALY

email address info@essegi-system.com

(hereinafter also the "Controller" or "Company")

1. Nature and Categories of Processed Data

For the purposes described in Section 2 ("Purposes of Processing"), the Company may process personal data of a "COMMON NATURE," mainly including: identification and personal details (e.g., name, surname, etc.), contact details (e.g., phone number, email address, certified email), and data relating to tasks, roles, and assignments (hereinafter also "Personal Data"). These personal data refer to internal contacts of Customers/Suppliers. Processing of Special Categories of Personal Data is excluded.

2. Purposes of Processing

Personal Data processing is aimed at managing the contractual/pre-contractual relationship with the Company and fulfilling legal and tax obligations, as well as ensuring effective management of financial and commercial relationships. Processing may also pursue any other legitimate interest of the Controller (e.g., for exercising and/or defending a right in judicial, administrative, or arbitration proceedings; ensuring security of access to the Controller's premises, etc.) and compliance with legal obligations, particularly in civil, tax, and accounting matters, as well as implementing provisions issued by tax authorities or supervisory bodies authorized by law.

3. Legal Basis

Processing of Personal Data for the purposes described in Section 2 ("Purposes of Processing") does not require the data subject's consent, as such processing is necessary to execute pre-contractual

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measures/contractual relationship between the Company and the Customer/Supplier of ESSEGI SYSTEM SERVICE SRL and to allow mutual fulfillment of obligations arising therefrom, as well as to enable the Controller to comply with legal obligations and/or pursue the Company's legitimate interest in conducting its business activities.

4. Processing Methods

In accordance with Article 5 of the GDPR, Personal Data subject to processing are:

- processed lawfully, fairly, and transparently toward the data subject;
- collected and recorded for specific, explicit, and legitimate purposes, and subsequently processed in a manner compatible with those purposes;
- adequate, relevant, and limited to what is necessary for the purposes for which they are processed;
- accurate and, where necessary, updated;
- processed in a way that ensures an adequate level of security;
- stored in a form that allows identification of the data subject for no longer than necessary to achieve the purposes for which they are processed.

Personal Data will be processed by the Controller using automated, electronic, IT, or telematic tools, and non-automated tools on paper. Specific security measures are observed to prevent data loss, unlawful or incorrect use, and unauthorized access.

5. Provision of Personal Data

Generally, providing Personal Data is necessary for negotiating, establishing, managing, and executing the contractual customer/supplier relationship with the Company. Refusal to provide Personal Data will make it objectively impossible for the Controller to execute the contractual relationship and/or properly fulfill all legal and/or contractual obligations.

6. Data Retention Period

Personal Data are retained for the time strictly necessary to achieve the purposes for which they were collected and processed, as outlined in Section 2 ("Purposes of Processing") of this notice. As a general principle, Personal Data will be retained for the time necessary to execute the contract. The Controller will still be required and/or entitled to retain Personal Data, in whole or in part, for specific purposes, as expressly required by contractual provisions or legal obligations, particularly tax and accounting, and for asserting and/or defending the Company's rights, including in court (e.g., in case of possible disputes regarding the contract signed with the Company).

7. Disclosure of Personal Data

I Dati Personal Data will be accessible, within their respective roles, to employees and collaborators of the Controller (e.g., employees of the Sales or Purchasing Department) for performing specific tasks and/or functions as authorized personnel, to external collaborators and service providers for the Controller, designated as data processors, who have been given specific written instructions, to the extent strictly necessary for the purposes described in Section 2 ("Purposes of Processing") of this notice.

Data collected and processed may therefore be disclosed exclusively for the purposes specified above, including but not limited to the following categories of recipients:

- Postal services or other couriers for correspondence delivery;
- Transport companies for goods shipment;
- Banks/financial institutions for managing collections and payments;
- Business consultants and professionals, including associated firms, collaborating with the Controller (e.g., accountants, auditors, and administrative, tax, and contractual consultants);
- Insurance companies;
- Public authorities in compliance with legal obligations.

8. Transfer of Personal Data Abroad

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Your Personal Data will not be transferred outside the European Union. If, for technical and/or operational reasons, it becomes necessary to use entities located outside the European Union or transfer some collected data to cloud systems and services located outside the EU, processing will be regulated in accordance with Chapter V of the Regulation and authorized based on specific EU decisions. All necessary safeguards will be adopted to ensure full protection of personal data, basing such transfer on: a) adequacy decisions for recipient third countries issued by the European Commission; b) appropriate safeguards provided by the recipient third party under Article 46 of the Regulation; c) adoption of binding corporate rules (so-called Corporate Binding Rules).

9. Data Subject Rights

As Data Subjects, the identified or identifiable natural persons to whom the processed data refer may exercise the rights recognized by the Privacy Regulation, if applicable, in particular:

- a. **Right of access;**
- b. **Right to rectification;**
- c. **Right to erasure** ("right to be forgotten");
- d. **Right to receive confirmation** that the operations referred to in b) and c) have been brought to the attention, including their content, of those to whom the data have been communicated or disseminated, except where this proves impossible or involves a manifestly disproportionate effort compared to the protected right;
- e. **Right to restriction of processing;**
- f. **Right to be informed of rectifications, erasures, and restrictions** on the processing of Personal Data;
- g. **Right to data portability;**
- h. **Right to object;**
- i. **Right to withdraw consent given;**
- j. **Right to lodge a complaint with the Competent Authority in Italy, represented by the Data Protection Authority (Garante per la protezione dei dati personali - Piazza Venezia, 11 - 00187 Rome (RM), Italy - PEC: protocollo@pec.gdpd.it) in case of unlawful processing (Art. 77 GDPR).**

subject to the limits set forth in Legislative Decree No. 101/2018, Art. 2-undecies (Restrictions on the rights of the data subject) and Art. 2-duodecies (Restrictions for reasons of justice).

10. Requests and Exercise of Data Subject Rights

To exercise the rights referred to in Section 9 ("Data Subject Rights"), you may submit a written request to the Controller by sending an email to: info@esseg-system.com.