

PRIVACY POLICY FOR CLIENTS AND SUPPLIERS

in accordance with the provisions set forth in art. 13 of the EU Regulation n. 2016/679 (GDPR) with reference to the protection of individuals with regards to the processing of personal information and the free circulation of such information. The EU Regulation n. 2016/679 repeals the Directive n. 95/46/EC

Dear Client / Supplier,

We wish to inform you that the European Regulation n. 679 of 27th April 2016 (GDPR) on the processing of personal information provides for the protection of individuals with reference to the processing of personal information. Thus, as article 13 of the EU Regulation 2016/679, we here provide you with the following information:

1. The identity of the Data Controller

The Data Controller is the Company **Labanti e Nanni Industrie Grafiche S.r.l.** (Fiscal Code/VAT N. 00574160370). Its registered headquarters are in Anzola dell'Emilia (Bologna), viale Marconi n. 10 , Post Code: 40011- e-mail: privacy@labantienanni.it, Telephone: +39 051.6723200. The company acts through the power of attorney given to its *pro tempore* legal representative.

2. Categories of personal information dealt with by the Data Controller

The data processing subject of this privacy policy makes reference only to "common" data, such as: personal and contact data (name, surname, telephone number, email address, etc.).

The data processing does not deal with data belonging to particular categories (the so-called "sensitive" data).

3. Data processing aim and legal framework

the processing of your personal information aims exclusively at:

- a) contract implementation and management and protection of the rights of the same;
- b) Complying with the obligations provided for by the legislation linked to the existing contract ;
- c) Sending communication and exchange data necessary for the implementation of the contract, there included the pre and post contract activities.

The data processing legal framework for the afore-mentioned objectives is the existing contract or the one being drafted.

4. Data processing methods

The personal data shall be handled on paper and electronically. The data shall be entered in appropriate databanks. Only the people responsible for data handling are authorised to access the databanks.

Data management may be carried out by third parties that supply the specific administrative, instrumental or elaboration services necessary for reaching the purposes as per here above.

All data management activities are carried out in a way that assures the integrity, confidentiality and availability of personal information.

5. Data retention period

The information supplied shall be stored for the whole duration of the working relationship and, subsequently, for a period of maximum 10 years from the last registration (as per law).

6. Data scope of communication and disclosure

The data may be disclosed to:

- all parties whose right to access the information is assured by law;
- our collaborators and employees within the scope of their data management duties ;
- all individuals and/or legal entities, both public and/or private, whenever data communication is necessary or functional for the setting up and management of the work relationship, within the afore-mentioned scopes and aims.

7. Obligatory or optional nature of data conferral

Data conferral is optional but necessary for allowing the Data Controller to start and/or execute the contract as per par. 3.

8. Rights as per articles. 15, 16, 17 18, 20, 21 and 22 of the EU Regulation 2016/679

We here inform you that, in your role as the person concerned, you have the right to lodge a complaint with a Control Body. Moreover, you also have the following rights you may assert by making an appropriate written request to the Data Controller, as per point 1.

Art. 15-Right of Access

The person concerned has the right to be informed by the Data Controller that their personal information is currently being handled or not. In the case it is being handled, the person concerned has the right to access their personal information and the information related to its handling.

Art. 16 – Right to Rectification

The person concerned has the right to have their incorrect personal information timely rectified by the Data Controller, even supplying an integrative declaration.

Art. 17 – Right to Cancellation (Right to Oblivion)

The person concerned has the right to obtain the timely cancellation of their personal information by the Data Controller. The Data Controller has to timely cancel the personal information of the person concerned.

Art. 18 – Right to restriction of data processing

The person concerned has the right to have the processing of their personal information restricted in the following cases:

1. a) the person concerned contests the accuracy of their personal information for the time required by the Data Controller to verify the accuracy of such personal information;
2. b) the personal information processing is illicit and the person concerned has opposed the cancellation of their personal data and asks for the limitation of use of their personal data;
3. c) although the Data Controller does not need the personal information anymore to the aims of data processing, the personal information is needed by the person concerned for ascertaining, exercising or defending their rights in court;
4. d) the person concerned has opposed the personal information processing as per Article 21, paragraph 1, while verifying the eventual prevalence of the legitimate rights of the Data Controller as opposed to the rights of the person concerned.

Art. 20 – Right to data portability

The person concerned has the right to receive the personal information they have supplied to a Data Controller in a structured form of common use and legible from an automatic device. The person concerned has the right to give such personal information to another Data Controller without any limitations from the part of the Data Controller that has supplied it. Upon exercising their right to data portability as per paragraph 1, the person concerned has the right to obtain the direct transmission of their personal information from a Data Controller to another Data Controller, if technically feasible.

Art. 21 – Right of Opposition

The person concerned has the right to oppose the processing of their personal information at any time and for any reason linked to their particular situation as per article 6, paragraph 1, letters e) or f)- there included profiling based on such provisions.

Art. 22 – Right not to be subjected to automatic decision-making process, there included profiling.

The person concerned has the right not to be subjected to decision-making based solely on automatic processing, there included profiling, that may legally affect them or that may meaningfully impact on their person.

Anzola dell'Emilia (Bologna), 22nd November 2023

The Data Controller
Labanti e Nanni Industrie Grafiche S.r.l.