

## **Information on the processing of personal data for Customers and Suppliers**

**In reference to articles 13 and 14 of the GDPR (General Data Protection Regulation) 2016/679**

**Basis Plant Services Srl** (Single shareholder company), hereinafter BPS, in its capacity as Data Controller, in the person of its Legal Representative, in reference to and for the purposes of EU Regulation no. 2016/679 (hereinafter also GDPR) articles 13 and 14, hereby informs the Customers, potential Customers and Suppliers, later for the brevity Data Subjects, that the personal data relating to them (for example the contacts of Data Subject's employees or collaborators) in the possession of the Data Controller, or that will be requested in the continuation of the relationship, or communicated to third parties, are processed in reference to and for the purposes of GDPR.

As a result of the above-mentioned legislation, the Data Controller hereby informs the Data Subjects about which data are processed and about the elements characterizing the specific data processing.

Any data processing must take place in accordance with the principles of lawfulness, fairness and transparency, in order to protect the rights and confidentiality of the Data Subjects.

### **Purpose of the processing and legal basis**

The processing of personal data of Data Subjects is aimed at the management of the activities of the commercial and procurement related to **pre-contractual activities, the entering into and the execution of a contract/commercial agreement** with the Data Controller, such as, but not limited to: communications/information management about the offered services, offers management, contracts/agreements management, invoicing management, storage, administration - management, - accounting – organizational – legal – taxation services and functional services related to the offer/contract/agreement management.

The Data Subject personal data processing activities for these purposes are essential for the execution of the contract to which the Data Subjects are parties, as well as the pre-contractual measures taken at the request of the same.

The data may also be processed to comply with any obligations provided for by laws and regulations, as well as by EU legislation and public authorities provisions.

The legal basis for processing is the need to comply with the Data Controller legal obligation, pursuant to art. 6, par. 1, lett. c) of the GDPR.

Moreover, the processing may be necessary for the protection in court and out of court of the rights due to the contract: in this case, the legal basis of the processing is the legitimate interest of the Data Controller, pursuant to art. 6, par. 1, lett. f) of the GDPR.

According to art. 22 par. 1 of EU Regulation 2016/679, in any case described above your personal data will be subjected to decision-making processes based solely on automated processing, including profiling, as defined in art. 4, par. 4, of the aforementioned Regulation.

For additional data processing needs of the Data Subjects that would occur for different purposes than those stated above, the Data Controller will provide the Data Subjects with dedicated information and, if necessary, to request specific consent.

### **Nature and origin of the processed data**

The provision of personal data is necessary in order to carry out the pre-contractual activities, the entering into and the execution of a contract/commercial agreement, therefore any refusal to provide them, in whole or in part, could make it impossible for the Data Controller to follow up the activities related to the execution of the contract/commercial agreement or the preparatory actions to the establishment of a contractual relationship.

Regarding the aforementioned purposes, for the proper performance of its activities, the Data Controller may process for example (but not limited to) identification and personal data, contact data, payment data and addresses of residence and domicile, belonging to employees or collaborators of the Data Subjects.

### Categories of recipients of the personal data

In addition to communications made for legal obligations, all data collected and processed may be disclosed only for the purposes specified above to the following categories of recipients:

- Data Controller employees and collaborators in charge to customers, suppliers and related activities management, expressly authorized and trained pursuant to art. 29 of the GDPR, who will receive instructions from the Data Controller about the methods of processing data of Data Subjects;
- third parties, identified as Processors, pursuant to art. 28 of the GDPR, with whom the Data Controller has entered into specific agreements about the processing activities, also providing specific written instructions on the methods of processing. The latter category includes the consultants that the Data Controller hires to manage the obligations provided for by current legislation, as well as for the technical and administrative support necessary for the activities related and instrumental to the proper management and execution of the pre-contractual relationships or the contract (such as, but not limited to, banks and financial companies, debt collection companies, credit insurance companies, fiscal-commercial and legal professionals and consultants, financial administration offices).

The complete and updated list of the Data Processors in charge, pursuant to art. 28 of the GDPR, is available at the Data Controller offices, or prior explicit and reasoned request to the Data Controller.

In any case your personal data will be disclosed, sold or exchanged with different third parties than those previously indicated.

### Method and place of data processing

For the purposes described above, the personal data of the Data Subjects may be processed and stored both in paper and digitized format, at the Data Controller offices and/or on corporate servers or third parties servers located within the European Union, by authorized subjects and in compliance with the minimum security measures provided by the Legislator.

The Data Controller does not transfer personal data to third countries or international organizations, but it could use cloud services, selecting the providers of such services among those who will provide adequate guarantees, as required by art. 46 of EU Regulation 2016/679.

### Data retention

The data will be stored, in the modalities described above, for the time strictly necessary to achieve the purposes mentioned above, and in any case no later than 10 years from the termination of any contractual relationship, unless there would be specific obligations to retain data, in accordance with current legislation and as described in the Data Controller's processing activities records.

Furthermore, the data will be processed for the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies. Further information regarding the retention period of the data may be submitted to the Data Controller upon explicit and reasoned request.

### Rights of the Data Subject

Data Subjects may exercise the rights referred to in articles 15 to 22 of GDPR, except to evaluate and verify their applicability in advance. In particular, pursuant to those articles, the Data Subject may exercise:

- right of access (art. 15): the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data;
- right to rectification or integration (art. 16): the right to obtain from the Data Controller without undue delay the rectification and/or integration of inaccurate or incomplete personal data concerning him or her;
- right to erasure ("right to be forgotten", art. 17): the right to obtain from the Data Controller the erasure of personal data concerning him or her without undue delay;
- right to restriction of processing (art. 18): if applicable, the right to obtain from the Data Controller restriction of processing;
- right to obtain from the Data Controller the notification regarding rectification or erasure of personal data or restriction of processing (art. 19);
- right to data portability (art. 20): if applicable, the right to receive the personal data concerning him or her, which he or she has provided to a Data Controller, in a structured, commonly used and machine-readable format and the right to

transmit those data to another Data Controller without hindrance from the Data Controller to which the personal data have been provided;

- right to object (art. 21): the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions;
- right to not be subject to an Automated individual decision-making, including profiling which produces legal effects concerning him or her or similarly significantly affects him or her (art. 22).

The Data Subjects may at any time exercise the above rights by contacting the Data Controller at the addresses indicated below. Finally, pursuant to art. 77 of the GDPR and without prejudice to any other administrative or judicial recourse, if Data Subjects believe that the processing concerning them violates the same Regulation, the Data Subjects have the right to submit a complaint to the Supervisory Authority, in accordance with the procedures described on its institutional website.

#### **Data Controller, Authorised Persons and Data Processors**

The Data Controller, to whom you can contact to assert the rights referred to in articles indicated above, is **Basis Plant Services Srl** (Single shareholder company), registered office in Florence (50127)-Italy, via Panciatichi n. 40 and administrative office in Prato (59100)- Italy, Via Valentini n. 14.

The aforementioned rights may also be exercised by You by sending communications to the following e-mail address: [basisplant.privacy@basisgroup.com](mailto:basisplant.privacy@basisgroup.com)

The updated list of the Authorised Persons and Data Processors is kept at the operational headquarters of the Data Controller.

**Florence (Italy), 18/08/2023**

**Data Controller - Basis Plant Services Srl**