



INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA PURSUANT TO EU REGULATION 2016/679 (“GDPR”)

This Information Notice has been created according to article 13 of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLAMENT AND COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation).

DATA CONTROLLER	Company name: Danieli & C. Officine Meccaniche S.p.A. Address: Via Nazionale n. 41, 33042 Buttrio (UD) E-mail address: dpo@danieli.it (Danieli)
DATA PROTECTION OFFICER (DPO)	E-mail address: dpo@danieli.it

TYPE OF PERSONAL DATA PROCESSED	The personal data processed by Danieli are considered common data, specifically they are: <ul style="list-style-type: none">- Name, surname, address, mail address, phone number, reference company;- Correspondence for the performance of the contract;
DATA SOURCE	The data are collected during pre-contractual and post-contractual activities and consequently in Danieli's CRM and ERP systems (i.e. directly provided by you).

DATA PROCESSING PURPOSES	The processing of personal data is carried out to manage and execute the commercial contract between the parties. This includes all operational, administrative, accounting, and organizational activities necessary to: <ul style="list-style-type: none">• prepare and manage commercial offers, orders, supplies, and services covered by the contract;• coordinate pre-contractual and post-contractual activities;• ensure the proper provision of the requested products and services;• manage operational communications related to contract execution;• fulfil all obligations arising directly from the contract.
LEGAL BASES FOR PROCESSING DATA	Performance of a contract to which the data subject is part or performance of pre-contractual measures taken at the request of the data subject, pursuant to Article 6(1)(b) of the GDPR.
DATA RETENTION PERIOD	Contractual duration and, after termination, for the ordinary statutory period of 10 years.

DATA PROCESSING PURPOSES	If necessary, to ascertain, exercise or defend the rights of the Data Controller in court.
LEGAL BASES FOR PROCESSING DATA	Legitimate interest.
DATA RETENTION PERIOD	In the case of judicial litigation, for the entire duration of the same, until the exhaustion of the terms of appeals.

DATA PROCESSING PURPOSES	Purpose related to the preliminary investigation regarding the Whistleblowing report, in compliance with the provisions of the Whistleblowing Guideline and Directive (EU) 2019/1937.
LEGAL BASES FOR PROCESSING DATA	Art. 6, paragraph 1, letter c) of the GDPR (fulfilment of a legal obligation to which the Data Controller is subject). Personal data processing is based on principles of fairness, lawfulness, transparency and protection of the involved person's confidentiality

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	and rights, as well as further principles provided for in Art. 5 of GDPR.
DATA RETENTION PERIOD	Nine months or for the time required to assess the legitimacy of the Whistleblowing report, except in cases where disciplinary measures are adopted and/or any litigations are initiated following the report.

Once the aforementioned retention periods have lapsed data will be destroyed or made anonymous compatibly with technical erasure and backup procedures.

DATA RECIPIENTS	<p>Data may be communicated to parties acting as external data processor such as e.g. supervisory and regulatory authorities and, more generally, public or private entities, legally authorized to request the data.</p> <p>Data may be as well processed, on Company's behalf, by external entities appointed as processors, who are provided with suitable operating instructions. These parties include the following categories:</p> <p>a. Data may also be processed, on the Company's behalf, by external entities appointed as processors and provided with appropriate operating instructions. These parties belong to the following categories:</p> <p>a) entities providing services strictly connected to the management of pre-contractual and contractual activities with customers;</p> <p>b) companies responsible for the provision of technical, administrative and commercial support services, including order management, deliveries and after-sales assistance;</p> <p>c) providers of IT services;</p>
PARTIES AUTHORISED TO DATA PROCESSING	Data may be processed by employees in company departments who are responsible for carrying out the activities outlined above and have been authorised to process the data and have received suitable operating instructions.
TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION	<p>The data can be transferred abroad to countries outside the European Union in which the Company has set up subsidiaries, particularly:</p> <p>a) Countries outside the European Union “whose level of data protection has been deemed suitable by the European Commission, pursuant to art. 45 of the GDPR”.</p> <p>b) Countries outside the European Union other than those mentioned in the previous item “who have signed the Standard Contractual Clauses adopted / approved by the European Commission in accordance with art. 46, lett. c) and d)”; a copy of the above-mentioned guarantees can be obtained by sending a specific request to the Controller according to the instructions in the paragraph “Rights of the Data Subject - Submitting a complaint to the Supervisory Authority”;</p> <p>c) Non-EU countries, in accordance with art. 49, lett. b) of the GDPR, for the performance of a contract stipulated between the Data Subject and the Data Controller, or the implementation of pre-contractual measures adopted on the request of the Data Subject.</p>
DATA SUBJECTS' RIGHTS - COMPLAINT TO THE SUPERVISORY BODY	<p>By contacting the DPO by e-mail at: dpo@danieli.com , data subjects may:</p> <p>a) ask the Controller for access to the Data that concern them, modify them, add to or cancel them, as well as limit their processing;</p> <p>b) object to processing in cases of the Controller's legitimate interest;</p> <p>c) receive the Data in a commonly used structured format that is readable on automatic devices and - if technically feasible - transfer them to another controller without impediment (i.e. “right to data portability”);</p> <p>d) revoke their consent at any time.</p> <p>The Data Subjects also have the right to submit a complaint to the Supervisory Authority at the following link: www.garanteprivacy.it</p>