

**INFORMATION CONCERNING THE HANDLING OF PERSONAL DATA RELATED TO CONTRACTS WITH SUPPLIERS, PURSUANT TO ART. 13 AND 14 OF EU REGULATION 2016/679 (“GDPR”)**



<b>DATA CONTROLLER</b>	Company name: <b>Danieli &amp; C. Officine Meccaniche S.p.A.</b> Address: Via Nazionale n. 41, 33042 Buttrio (UD) Telephone number (+3904321958111) <b>(Company)</b>
<b>DATA PROTECTION OFFICER (DPO)</b>	e-mail address (dpo@danieli.com)
<b>PERSONAL DATA PROCESSED</b>	“Data” refers to the data of natural persons processed by the Company for stipulation and performance of contracts with its suppliers, such as those of the supplier’s legal representative who signs a contract on behalf of the supplier, and of the supplier’s employees/consultants involved in the activities under the contract. In the latter case, the Data source is the supplier. The Data could also include any judicial data found in public databases
<b>DATA SOURCE AND CATEGORIES OF DATA COLLECTED BY THIRD PARTIES</b>	The data are collected from the data subject (i.e. are directly provided by you) or, during the contract validity period, acquired by third parties (including but not limited to companies that can access public databases to check if a supplier is on an international “restricted list”)
<b>PURPOSES OF DATA PROCESS</b>	To set up and perform contracts between suppliers and the Company, including: -processing of personal data and supplier registers -supplier qualification -purchasing requests -contractual relationship -distributed computing -warehouse management, shipping (inbound and outbound) and shipment monitoring -Managing technical documentation and filing of shipping documents -Maintenance work
<b>LEGAL BASIS FOR PROCESSING</b>	Performance of the contract, for the Data of the Supplier’s legal representative  Legitimate interest, for the Data of the supplier’s employees/consultants involved in the activities under the contract
<b>DATA RETENTION PERIOD</b>	For the contract validity period, and for 10 years after the contract expiry date
<b>PURPOSES OF DATA PROCESS</b>	Administration and accounting purposes such as accounting and cash flow management, as well as invoicing (e.g. checking and recording invoices) in compliance with current regulations
<b>LEGAL BASIS FOR PROCESSING</b>	Fulfillment of the Company’s legal obligations
<b>DATA RETENTION PERIOD</b>	For the contract validity period, and for 10 years after the contract expiry date
<b>PURPOSE OF DATA PROCESSING</b>	Purposes related to compliance with the rules on health and safety’s workplace: 1) management of medical documents aimed at protect workers' health and safety, in relation to the work environment and professional risk factors 2) collection of job suitability (fitness for the job, fitness for the job with prescriptions, partial fitness, unfitness); 3) management of first aid and investigations related to the accident

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- 4) insertion or update of data related to the plant and equipment operators and, if required, verification of the certifications or validity of participation in specific trainings
- 5) verification of the actual existence of a subordinate employment relationship between the person concerned and the contracting company (“Testo Unico del Lavoro”)

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<b>LEGAL BASIS FOR PROCESSING</b>	For common data: is a legal obligation For particular categories of data: art. 9, co. 2, lett. b) <sup>1</sup>
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<b>DATA RETENTION PERIOD</b>	For the contract validity period and, after expiration, for 20 years for purposes at no. 1), 2), 3) For the contract validity period and, after expiration, for 20 years for purposes at no. 4)
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<b>PURPOSES OF DATA PROCESS</b>	Control physical accesses (including videosurveillance) in order to guarantee people and goods' safety through the verification of the identity of those who access the company spaces (including a photo card of the data subject)
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<b>LEGAL BASIS FOR PROCESSING</b>	Legitimate interest
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<b>DATA RETENTION PERIOD</b>	Videosurveillance: 7 days from the moment images are saved  Access control different from videosurveillance: 10 years from the moment of detection
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<b>PURPOSE OF DATA PROCESS</b>	If necessary, to ascertain, exercise and / or defend judicial rights of the Company
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<b>LEGAL BASIS FOR PROCESSING</b>	Legitimate interest
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<b>DATA RETENTION PERIOD</b>	In case of litigation, for the entire duration of it, until the expiration of the terms of enforceability of the appeal actions
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<b>PURPOSES OF PROCESS</b>	Purposes connected to: management of internal and external controls
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<b>LEGAL BASIS FOR PROCESSING</b>	Legitimate interest
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<b>DATA RETENTION PERIOD</b>	Until the end of the employment relationship and, after termination, for the period of 10 years
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<b>PURPOSES OF PROCESS</b>	To determine, through specialized companies, if the supplier is on an international “restricted list”, by consulting information found on public databases
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<sup>1</sup> Referring to art. 9, co.2 lett. b) of GDPR: “processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;[...]”

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<b>LEGAL BASIS FOR PROCESSING</b>	Legitimate interest
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<b>DATA RETENTION PERIOD</b>	For common data: 5 years after receiving the information dossier  For data concerning criminal offences: 5 years after receiving the information dossier
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<b>PURPOSE OF PROCESS</b>	To control logical access to company information systems in order to ensure the security of people and assets (for example, management of system administrator logs, management of contents filtering, cybersecurity).
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<b>LEGAL BASIS FOR PROCESSING</b>	Legitimate interest
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<b>DATA RETENTION PERIOD</b>	5 years from when logical access is detected  1 year for system administrator access logs  5 years for data management of content filtering (cyberattacks prevention and log management)
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<b>PURPOSE OF PROCESS</b>	To ascertain the requirement of moral standing of customers' top executives
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<b>LEGAL BASIS FOR PROCESSING</b>	Legitimate interest
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<b>DATA RETENTION PERIOD</b>	For common data: 5 years after receiving the information dossier  For data concerning criminal convictions and criminal offences: 5 years after receiving the information dossier
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<b>PURPOSE OF PROCESS</b>	To control logical access to company information systems in order to ensure the security of people and assets (for example, management of system administrator logs)
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<b>LEGAL BASIS FOR PORCESSING</b>	Legitimate interest
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<b>DATA RETENTION PERIOD</b>	5 years from when logical access is detected  6 months for system administrator access logs
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At the end of the retention period mentioned above, the data will be destroyed, cancelled or made anonymous, in accordance with technical cancelling or back-up procedures.

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<b>DATA TRANSFER</b>	Data transfer is mandatory in order to enter into and/or perform a contract. The refusal to provide Data, therefore, prevents you from entering into a contractual relationship and/or from fulfilling the corresponding obligations
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<b>DATA RECIPIENTS</b>	<p>The Data can be transferred to external subjects acting as data controllers, including but not limited to banks and credit institutes, self-employed professionals (legal and accounting firms), supervisory and monitoring authorities and bodies, and subjects in general, whether public or private, who are entitled to request the Data.</p> <p>The Data can be processed, on behalf of the controller, by external subjects appointed as data processors, who perform specific activities on behalf of the controller, including but not limited to accounting, tax and insurance operations, delivery of correspondence, managing receipts and payments, etc.</p>
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<b>SUBJECT AUTHORIZED TO PROCESS</b>	The Data can be handled by employees of the company departments tasked with pursuing the above-mentioned aims, and who have been explicitly authorized to handle the data and have received the necessary operating instructions.
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<b>TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION</b>	<p>The data can be transferred to countries that do not belong to the European Union, and particularly to the US, a country whose data protection system has been deemed suitable by the European Commission, as per art. 45 of the GDPR.</p> <p>The European Commission’s decision regarding the adequacy of this system can be found at the following link: <a href="http://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:32016D1250&amp;from=IT">http://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:32016D1250&amp;from=IT</a></p>
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<b>RIGHTS OF THE DATA SUBJECT – COMPLAINTS TO THE SUPERVISORY AUTHORITY</b>	By contacting the Legal Department at ( <a href="mailto:dataprotection@danieli.com">dataprotection@danieli.com</a> ), data subjects may ask the data controller for permission to access or cancel their data, correct erroneous data, add to incomplete data, and limit processing in the cases specified in art. 18 of the GDPR, and to object to processing for the purpose of the controller’s legitimate interest
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Moreover, in cases where data handling is based on consent or on a contract and is done using automated tools, the data subjects are entitled to receive the data in a commonly used structured format that is readable on automatic devices, as well as, if technically feasible, to transfer them to another data controller without impediments

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The data subjects have the right to submit a complaint to the Supervisory Authority having jurisdiction in the State in which they normally reside or work, or in the State where the alleged violation occurred

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**ACKNOWLEDGEMENT OF THE  
INFORMATION STATEMENT**

By signing this document, I hereby declare that I have received and read the Privacy Statement and will distribute it to the employees/consultants of the company I represent.

In \_\_\_\_\_, on \_\_/\_\_/\_\_\_\_

Stamp and signature \_\_\_\_\_