

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



DATA CONTROLLER Company name: **Danieli & C. Officine Meccaniche S.p.A.**
Address: Via Nazionale n. 41, 33042 Buttrio (UD).
Italy (hereinafter, the “Company”).

DATA PROTECTION OFFICER (DPO) e-mail address (dpo@danieli.com)

PERSONAL DATA PROCESSED “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

DATA SOURCE AND CATEGORIES OF DATA COLLECTED BY THIRD PARTIES 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”)

PURPOSES OF DATA PROCESS	To set up and perform contracts between suppliers and the Company, including: <ul style="list-style-type: none"> - 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.
LEGAL BASIS FOR PROCESSING	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.
DATA RETENTION PERIOD	For the contract validity period, and for 10 years after the contract expiry date.

PURPOSES OF DATA PROCESS	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.
LEGAL BASIS FOR PROCESSING	Fulfillment of the Company’s legal obligations.
DATA RETENTION PERIOD	For the contract validity period, and for 10 years after the contract expiry date.

PURPOSE OF DATA PROCESSING	<p>Purposes related to compliance with the rules on health and safety's workplace:</p> <p>1) management of medical documents aimed at protect workers' health and safety, in relation to the work environment and professional risk factors;</p> <p>2) collection of job suitability (fitness for the job, fitness for the job with prescriptions, partial fitness, unfitness);</p> <p>3) management of first aid and investigations related to the accident</p> <p>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;</p> <p>5) verification of the actual existence of a subordinate employment relationship between the person concerned and the contracting company ("Testo Unico del Lavoro").</p>
LEGAL BASIS FOR PROCESSING	<p>For common data: is a legal obligation</p> <p>For particular categories of data: art. 9, co. 2, lett. b)¹</p>
DATA RETENTION PERIOD	<p>For the contract validity period and, after expiration, for 20 years for purposes at no. 1), 2), 3), 4) e 5).</p>

PURPOSES OF DATA PROCESS	<p>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).</p>
LEGAL BASIS FOR PROCESSING	<p>Legitimate interest in accordance with the guidelines issued by EDPB in 03/2019, considered to override the interests, rights and freedoms of the Data Subject.</p>
DATA RETENTION PERIOD	<p>Seven (7) days from when the footage is taken.</p> <p>To monitor entry to company premises by means other than video surveillance: ten years since the Data are collected.</p>

PURPOSE OF DATA PROCESS	<p>If necessary, to ascertain, exercise and / or defend judicial rights of the Company.</p>
LEGAL BASIS FOR PROCESSING	<p>Legitimate interest, exercise or defend the Controller's rights in a court of law.</p>
DATA RETENTION PERIOD	<p>In case of litigation, for the entire duration of it, until the expiration of the terms of enforceability of the appeal actions.</p>

PURPOSES OF PROCESS	<p>Purposes connected to management of internal and external audits.</p>
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¹ 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;[...]"

LEGAL BASIS FOR PROCESSING	Legitimate interest (art. 6 lett. B e C GDPR)
DATA RETENTION PERIOD	Until the end of the contractual relationship and, after termination, for the period of 10 years.

PURPOSES OF PROCESS	To determine, through specialized companies, if the supplier is on an international "restricted list", by consulting information found on public databases
LEGAL BASIS FOR PROCESSING	Legitimate interest (art. 6 lett. B GDPR)
DATA RETENTION PERIOD	For common data: 5 years after receiving the information dossier. For data concerning criminal offences: 5 years after receiving the information dossier.

PURPOSE OF PROCESS	To monitor access to company information systems and outline how company information systems are used (for example, management of logs, management of system administrator logs, content filtering management, prevention of cyberattacks, centralized collection and analysis of logs) in order to ensure the security of people and assets and protect the Controller's industrial and intellectual property.
LEGAL BASIS FOR PROCESSING	Legitimate interest in protecting intellectual and industrial property.
DATA RETENTION PERIOD	Twelve months from when the event was observed.

PURPOSE OF PROCESS	To ascertain the requirement of moral standing of customers' top executives.
LEGAL BASIS FOR PROCESSING	Legitimate interest (art. 6 lett. B GDPR).
DATA RETENTION PERIOD	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.

PURPOSE OF PROCESS	Purpose related to the preliminary investigation regarding the Whistleblowing report, in compliance with the provisions of the Whistleblowing Guideline and Directive (EU) 2019/1937.
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LEGAL BASIS FOR PROCESSING	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 and rights, as well as further principles provided for in Art. 5 of GDPR.
DATA RETENTION PERIOD	The Data Controller retains data for a period of nine months or for the time required to assess the legitimacy of the report, except in cases where disciplinary measures are adopted and/or any litigations are initiated following the Report.

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.

DATA TRANSFER 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

DATA RECIPIENTS 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.

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

SUBJECT AUTHORIZED TO PROCESS 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.

TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION The Data can be transferred abroad to countries outside the European Union in which the Company has set up subsidiaries, particularly:

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.

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";

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.

RIGHTS OF THE DATA SUBJECT – COMPLAINTS TO By contacting the group DPO at (dpo@danieli.com), data subjects may ask the Company (data controller) for permission to access or cancel their data,

**THE SUPERVISORY
AUTHORITY**

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

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

The Data subjects have the right to submit a complaint to the Supervisory Authority at the following link: www.garanteprivacy.it

Buttrio (Italy), May 2022