

PRIVACY CIRCULAR FOR SUPPLIERS

1. INTRODUCTION

Hereby, Mectronic Medicaale S.r.l., VAT 02433980162, with registered office in “via Orio al Serio” n°15, 24050, Grassobbio (BG), Italy, that can be contacted via the email address *info@mectronicmedicale.it*, informs you, as data's owner, that Personal data of the client (in the case of a natural person or an individual society), of its employees or its notified responsables for the negotiations regarding the contract to which this circular is attached (hereinafter referred to as “**Contract**”) between the Company and the counterparty of the Contract (hereinafter referred to as “**Supplier**”) and during its implementation and the implementation of the activities connected to it (hereinafter referred to as “**Personal Data**” and the individuals to whom this Personal Data are referred are defined hereinafter as “**People Concerned**”), will be treated as amended by the hereby circular concerning the treatment of Personal Data.

2. WHO IS THE TITOLAR OF THE TREATMENT?

The Company is the data's owner in relation to the treatment of Personal Data.

3. WHICH KIND OF PERSONAL DATA ARE TREATED BY THE COMPANY?

The Company gathers and treats Personal Data provided by the Suppliers and/or by the People Concerned, like for example those relative to their employees: Name, Surname, Address, Mail, e Phone number.

4. FOR WHAT PURPOSE ARE PERSONAL DATA TREATED BY THE COMPANY?

The Company treats Personal Data of the People Concerned using analogic and digital tools for:

- a) the execution of the negotiations and of the following Contract between the Company and the Supplier;
- b) to defend their rights, also in the field of credit-recovery procedures;
- c) to fulfill the obligations arising from the applicable regulation, including the implementation of reporting to the relevant authorities and to the supervisory bodies and to comply with the requests that come from them;
- d) the execution of functional activities to ceding the Company or some branches of it, acquisitions, mergers, divisions or other transformations and for the execution of these operations.

5. WHAT IS THE LEGAL BASIS OF THE PROCESSING OPERATION?

The treatment of Personal Data is mandatory:

- for the execution of the Contract in relation to the purposes referred to in paragraph 4, letters a) and b);
- to comply with legal obligations in relation to the purposes referred to in paragraph 4, letter c);
- for the legitimate interest of the company and of its counterparts at the conclusion of the agreements referred to in paragraph 4, letter d) in relation of those purposes.



The refusal of Personal Data's supply for the purposes referred to in paragraph 4, letters from a) to c) may prevent the conclusion of the Contract, and if already concluded, it may prevent the regular execution. On the contrary, it is possible for legitimate reasons to object the treatment for the purposes referred to in paragraph 4, letter d).

6. WHO HAVE ACCESS TO PERSONAL DATAS?

The Company may disclose the Personal Data of the People Concerned to:

- collaborators, employees and Suppliers of the Owner, in the context of their duties and/or of any contractual obligations with them, inherent to the commercial relations with you;
- legal, administrative and tax consultants who assist the Company in executing its activities;
- banking institutions for the management of receipts and payments deriving from the execution of the Contract with the Supplier;
- sub-suppliers and/or subcontractors engaged in activities related to the execution of the Contract with the Owner, in quality of external processors;
- public bodies and/or legal authorities and/or control authorities, in the event of their request, as autonomous holders of the treatment;
- cloud or IT service providers.

7. ARE PERSONAL DATAS TRANSFERRED ABROAD?

The Personal Data of the People Concerned will not be transferred to countries outside the European Economic Area. However the Company reserves the right to use cloud services; in which case, the service providers will be selected from those who provide adequate guarantees, as required by article 46 of the Regulation (EU) 2016/679. The Owner undertakes to comply with the provisions set forth, respectively, by the decisions 2001/497/CE, 2004/915/CE and 2010/87/EU (depending on the case), which require the subscription of so-called "Standard contractual clauses" between legal entities involved in the processing of non-EU data;

8. WHICH RIGHT THE PERSON CONCERNED HAS REGARDING HIS PERSONAL DATA?

Pursuant to articles 13, paragraph 2, and 15 to 21 of Regulation (EU) 2016/679, we inform you that with regard to the processing of personal data, the Supplier may exercise the following rights:

a) Right to obtain access to personal data and to the following information:

- confirmation that your personal data is being processed;
- the purposes of the processing;
- the categories of personal data;
- the recipients or categories of recipients to whom the personal data have been or will be communicated;
- if the data are not collected from the interested party, all available information on their origin;
- the existence of an automated decision-making process, including profiling;
- a copy of the personal data being processed.



b) Right of rectification and integration of personal data;

c) Right to data deletion (“right to oblivion”) if one of the following reasons exists:

1. the Personal Data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;
2. the Person Concerned withdraws his consent to the processing of data and there is no other legal basis for processing;
3. the Person Concerned opposes the processing and there is no legitimate prevailing reason to proceed with the processing;
4. the Personal Data have been processed illegally;
5. the Personal Data must be deleted in order to fulfill a legal obligation provided for by the law of the Union or of the Member State to which the data controller is subject;

The data owner, if he has made Personal Data public and is obliged to delete them, must inform the other owners who process the Personal Data of the request to cancel any link, copy or reproduction of his data.

d) Right to limitation of processing if:

1. The interested party contests the accuracy of personal data, for the period necessary for the data controller to verify the accuracy of such personal data;
2. The treatment is illicit and the Person Concerned is opposed to the deletion of personal data and instead requests its use to be limited;
3. Although the data controller no longer needs it for the purposes of processing, personal data is necessary for the Person Concerned to ascertain, exercise or defend a right in court;
4. The Person Concerned has opposed the processing, pending for a verification regarding the possible prevalence of the legitimate reasons of the data owner opposed to those of the Person Concerned.

e) The right to lodge a complaint with the Guarantor for the protection of personal data, following the procedures and indications published on the official website of the Authority www.garanteprivacy.it.

f) Right to data portability or the right to receive in a structured format, commonly used and readable by an automatic device, the personal data concerning him provided to a data owner and possibly forward them to another data owner, if the processing is based on consent or a contract and is carried out by automated means. Where technically possible, the Person Concerned has the right to obtain direct transmission of data from one data owner to another.

g) The right to object to the processing of personal data at any time, including profiling, in particular if:

1. the processing takes place on the basis of the legitimate interests of the owner, after explaining the reasons for the opposition;



2. personal data are processed for direct marketing purposes.

h) The right not to be subjected to a decision based solely on automated processing, including profiling, except where the decision is necessary for the conclusion or execution of a contract between the data subject and a data controller, is authorized by Union or Member State law to which the controller is subject or based on the explicit consent of the data subject.

i) Right to withdraw consent at any time; obviously with every consequence deriving from the impossibility of being able to fulfill legislative or contractual provisions if the treatment is established by these provisions. The exercise of rights is not subject to any form restrictions and is free.

9. CONSERVATION TIMES OF PERSONAL DATA

Your personal data will be stored for the time strictly necessary to carry out the aforementioned purposes and to fulfill the obligations provided for by the law.

10. HOW TO CONTACT THE DATA OWNER

Should the interested party have any doubts or concerns regarding this information or wish to exercise the rights provided by this information notice, he may contact the Company at the following address *info@mectronicmedicale.it*.

11. MODIFICATIONS AND UPDATES

This circular is valid from the date on which it was presented. However, the Company may, subject to prior notice, make changes and / or additions to this information, also as a consequence of the beginning of the effectiveness of the Privacy Regulation and any subsequent amendments and / or regulatory additions.

Luogo Grassobbio **Data** 24/06/2019

Mectronic Medicale S.r.l.

Via Orio al Serio n°15, 24050, Grassobbio (BG), Italia | info@mectronicmedicale.it

Numero REA: BG - 289325 | Capitale sociale: 20.800,00 Euro | P.IVA/C.F 02433980162

