

**Privacy Policy for customers and suppliers**  
**(“Informative” )**  
**(Version 00, May 2018)**

<b>1.</b>	<b>Holder:</b>	<p><b>Peen Service S.r.L.</b>, whose data are reported in the <i>footer</i> of the company’s internet site reachable through the URL <a href="http://peenservice.it/">http://peenservice.it/</a> (“Company”), engages to protect personal data in compliance with (a) the (EU) Rule 2016/679 with regards to protection of individuals and with regards to personal data processing, as well as the free circulation of such data which abrogates the 95/46/CE directive (“GDPR”) and in compliance with (b) the Italian national regulations regarding the protection of personal data (“National Laws on Data Protection”)</p>
<b>2.</b>	<b>Authorized internals:</b>	The data are processed by authorized individuals who have been duly instructed and who are involved in the activities of such processing.
<b>3.</b>	<b>Authorized externals/ processing receivers:</b>	<p>The data may be communicated to externals who are in charge of carrying out processing according to agreements undertaken with the Company. Externals belong to the following categories: software suppliers with relative maintenance and support; tax and accountancy consultants; consultants for job safety; banks.</p> <p>Furthermore the data may be communicated to third parties who act as autonomous processing holders such as: security staff; certifying agencies.</p> <p>The Company supplies specific information with regards to people in charge and to whosoever required by the concerned.</p>
<b>4.</b>	<b>Interested in processing:</b>	<p>Customers (even potential ones) individuals or customer referents that is legal persons who have business relations with the Company; Suppliers (even potential ones) individuals or supplier referents that is legal persons who have business relations with the Company; freelancers and consultants, referents of contractors subcontractors; suppliers’/contractors’/subcontractors’ personnel.</p>
<b>5.</b>	<b>Processed personal data:</b>	<p>1) The data that are processed consist of common data such as, for example, the name and surname of the legal representative or owner, the company name or firm name, fiscal code, VAT number, legal and tax domicile, complete postal addresses and telephone numbers as well as mobile phone numbers, faxes, e-mails and certified email</p>

		<p>addresses, ZIP codes and in general, all the necessary information for the execution of the contract, such as current account bank coordinates and/or anything relating the debiting system of payments.</p> <p>2) As well as the data above mentioned, the Company may process, with regards to the suppliers', contractors', subcontractors' personnel, the following data: (a) badge number, company they work for, salary, qualification, level, social security and insurance data, other data contained in pay slips, special qualifications to carry out special activities; (b) special data categories, such as, data contained in health certificates which enable the carrying out of work tasks.</p>
<b>6.</b>	<b>Purpose</b>	<p>1) Data processing is carried out in order to establish and execute contractual relationships with customers and suppliers (even potential ones), as well as to comply with law obligations.</p> <p>2) Personal data processing regarding suppliers'/contractors'/subcontractors' is carried out in order to verify qualifications as well as to protect the Company for all the foreseen legal bindings.</p> <p>3) Unless there is disagreement from the Company (<i>opt-out</i>), the processing of email addresses of customer referents, is carried out in order to send commercial communication of Company products similar to those already subject of a previous business transaction.</p>
<b>7.</b>	<b>Legal basis of the processing</b>	<p>Data processing is necessary so as to execute the contract that is, the pre-contractual measures on request of the concerned and to comply with law obligations.</p> <p>Data processing regarding suppliers'/contractors'/subcontractors' personnel is carried out in order to comply with law obligations and legitimate interest of the Company.</p>
<b>8.</b>	<b>Data retention time</b>	<p>The personal data of customers/suppliers and related referents are kept for all the duration of the contractual business relation and shall be cancelled after ten years and six months from the termination of the contract for defence reasons unless a controversy/dispute may have arisen, and in such case the data will be retained in order to exercise the right of defence and to manage the dispute.</p> <p>Limited to the data as per point 2) of paragraph 5 (Processed Personal Data) regarding suppliers'/contractors'/subcontractors' personnel, the data will be cancelled after three years from termination of contract, unless a controversy/dispute may have arisen, and in such case the data will be</p>

		retained in order to exercise the right of defence and to manage the dispute.
<b>9.</b>	<b>Optional/compulsory provision of data</b>	The provision of data from whom involved is necessary in order to enable the Company to comply with the law obligations as well as contractual obligations that is, respond to pre-contractual requests. Should there be a refusal to supply personal data, partly or totally, the Company will not be able to execute the contract and or comply with the law obligations.
<b>10.</b>	<b>Transfer of data abroad</b>	The data of supplier referents may be transferred to countries set outside the European Union in order to carry out the activities for projects of customers outside the EU. The transfer of the data will, however, be carried out in compliance with articles 44 and ss. of the GDPR and with prior communication regarding the country where such data are to be transferred and the safeguard mechanisms according to provisions of the GDPR.
<b>11.</b>	<b>Rights</b>	Interested parties may contact the Company or external people in charge so as to exercise the rights foreseen by the National Laws regarding Data Protection and by the GDPR (articles 15 and ss.), and in particular, to access one's own personal data, to have them rectified and updated or cancelled, to ask for limitations, portability by sending written communication to the addresses of the Company above given.
<b>12.</b>	<b>Right of opposition</b>	With the same modalities foreseen above, the concerned may oppose to, partially or completely, processing personal data that regard them, if it judicially constitutes a legitimate interest for the Company, as per what foreseen by article 21 of the GDPR.
<b>13</b>	<b>Complaint</b>	Whoever deems that the data processing concerning them violates the GDPR , as per what established by article 77 of the GDPR, may file a complaint with a controlling body where the concerned resides or works habitually that is a controlling authority where the violation is alleged to have taken place.
<b>14</b>	<b>Revocation of consent</b>	Exercising <i>opt-out</i> (revocation of consent) by customer referents, with regards to the use of email addresses to send electronic communications, is possible at any time by the concerned and will cause the immediate stoppage of any further communication.
<b>15</b>	<b>Updates and revisions</b>	The Company reserves the right to modify and/or update the information, keeping into account possible and successive integrations and/or

modifications of the national and/or EU rules regarding data protection or due to further purposes of data processing. For this reason the info is published with a progressive identification number as well as with the month of publication, starting from the 2018 May version, which carries number "00". The new Info versions will substitute the previous ones and shall be valid, effective and applicable from the date of publication on the web that is from the date of communication to those concerned.