



Data Protection Management System

Doc. **INF-DPMS.03** Rev. **01** of **26/10/2022**
Classification: **L1 – PUBLIC**

SUPPLIERS PRIVACY POLICY

Provided in accordance with Articles 12, 13 and 14 of Regulation (EU) 2016/679

Ai ENGINEERING s.r.l.

Legal and operational headquarter
C.so Francesco Ferrucci, 112 - 10138 Torino (Italy)
VAT No. IT 06764910011
Tax Code/Company Register TO 01066850064
REA Code: TO – 632269



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1 DOCUMENT RECIPIENTS

This document is addressed to our **Suppliers** or potential Suppliers and to all individuals who for whatever reason give their personal data to our organization while acting on behalf of or for our Suppliers or potential Suppliers.

Minors: In case you are a minor, e.g. a student included in an Alternanza Scuola Lavoro (D. Lgs.77/2005) program, please contact your company manager in order to better understand the contents of this document.

2 PREMISE

In compliance with the indications provided by **Regulation (EU) 2016/ 679** (hereinafter, "**Regulation**" or "**GDPR**") regarding the processing and free movement of personal data, you have the right to know all information regarding the processing of your personal data in a clear and transparent manner. Therefore, in compliance with this principle, we hereby intend to inform you about the processing of your personal data.

3 DEFINITIONS

Definitions of terms used in this policy are to be understood as per Article 4 of [EU Regulation 2016/679](#).

4 DATA CONTROLLER OF YOUR PERSONAL DATA

Ai ENGINEERING s.r.l. (hereinafter simply Ai ENGINEERING) is the Owner of the Processing of your personal data in accordance with the Regulation. The contact information is provided below:



Ai ENGINEERING s.r.l.

Registered office and operational headquarter: C.so Francesco Ferrucci, 112 - 10138 Torino (Italy)

VAT No. IT 06764910011- Tax Code/Company Register TO 01066850064 - REA Code: TO – 632269

PEC: aiengineering@legalmail.it

Telephone +39 0115814 511

e-mail: **privacy@aigroup.it**

4.1 Data Protection Officer - DPO

Ai ENGINEERING is not required to appoint a DPO (Data Protection Officer) under Article 37 of the GDPR.

4.2 Data Protection Coordinator

Ai ENGINEERING, also in accordance with art. 2-quaterdecies of Legislative Decree 196/2003 (so-called "Privacy Code"), has appointed a corporate Data Protection Coordinator with the task of supervising the compliance of the treatments with the GDPR.

The Data Protection Coordinator is at your disposal for any clarification or information regarding the processing of your personal data and to facilitate you in the possible exercise of your rights under the Regulations.

You may contact the Data Protection Coordinator at the following e-mail address: **privacy@aigroup.it**

5 OUR COMPANY POLICY ON THE PROTECTION OF PERSONAL DATA

Ai ENGINEERING has always been very attentive to the security of the information it manages, with particular regard to information that may contain personal data (pursuant to former Article 4.1 GDPR) or special categories of personal data (pursuant to former Article 9 GDPR). For this reason, the company has decided to adopt a single organizational model, called **Data Protection Management System** (hereinafter "**DPMS**" or "**System**"), also based on the guidelines of ISO 27001 standards. Taking into account the context of our organization, supply chain requirements and stakeholder expectations, the System, establishes Leadership and commitment of the Data Controller, through the definition of organizational roles, internal and external responsibilities and authority of those involved. Within the DPMS, security objectives are identified and the actions necessary to achieve them are planned. The necessary resources and expertise are also ensured in order to constantly and continuously improve the System over time, periodically verifying its scope and alignment with corporate purposes.

6 PURPOSE OF THE PROCESSING



Personal data relating to you, such as name, surname, address, telephone, fax, e-mail, company role, as well as other information voluntarily provided by you or your organization to our Company or by Ai ENGINEERING deduced by virtue of the existing relationship, (hereinafter, the "Data") will be processed exclusively for the following purposes:

| ID | Description of the purposes, legal bases, origin of the data and duration of the processing |
|----|---|
| F1 | <p>Purpose: <i>To execute contractual and/or pre-contractual measures aimed at the provision of goods or services by your organization to our Company. This includes handling requests for quotations from, orders, any claims, warranties, payments and refunds.</i></p> <p>Lawfulness: These processing operations are carried out in accordance with Article 6 par. 1 letter b) of the GDPR.</p> <p>Origin of data: The data, generally contact information associated with your other business information, may be conferred directly by you or communicated by your organization, derived from your existing relationship or may come from public directories or collected from third parties who have reported to you.</p> <p>Duration of processing: The treatment will cease upon expiration of the contractual relationship.</p> <p>Further retention: If deemed appropriate and lawful, at the end of the processing period, your personal data may be anonymised (see purpose F7) or further retained for civil or judicial reasons (see purpose F5).</p> |
| F2 | <p>Purpose: <i>To fulfill legal obligations, regulations arising from EU legislation, or arising from instructions given by public authorities or supervisory bodies. For example, your personal data may be used to manage invoicing, comply with our accounting and tax obligations, protect health and safety in the workplace (should you carry out your activity at one of our establishments), fulfill any reporting obligations.</i></p> <p>Lawfulness: These processing operations are carried out in accordance with Article 6 par. 1 letter c) of the GDPR.</p> <p>Origin of data: The data, generally contact information associated with your other business information, may be conferred directly by you or disclosed by your organization, derived from your existing relationship, or may be from public directories or collected from third parties who have reported to you.</p> <p>Duration of processing: The process will cease when the legal obligation expires.</p> <p>Further retention: In accordance with the retention period imposed by law, if deemed necessary and lawful, your data may be further stored for civil or judicial reasons (see purpose F5).</p> |
| F3 | <p>Purpose: <i>To identify, select, accredit our suppliers, evaluating their suitability (including over time), managing, nurturing, and consolidating supplier relationships, planning commercial, financial, and market strategies, setting budgets, optimizing operational strategies, and planning business objectives.</i></p> <p>Lawfulness: These processing operations are carried out pursuant to in accordance with Article 6 par. 1 letter f) on the basis of the Legitimate Interest of the Owner.</p> <p>Origin of data: The data, generally are those collected for purposes F1 and F2 and possibly supplemented by us through the provision of additional information by you or your organization or otherwise obtained during the existing relationship.</p> <p>Duration of processing: Subject to the exercise of the right to object, Processing will last until the interest pursued by the Data Controller is achieved. Normally 10 years from the last business relationship.</p> <p>Further retention: If deemed appropriate and lawful, at the end of the processing, your personal data may be anonymized (see purpose F7) or further stored for civil or judicial reasons (see purpose F5).</p> |
| F4 | <p>Purpose: <i>To achieve, maintain and demonstrate certifications or accreditations (e.g., TISAX), to comply with our clients' industry regulatory standards (e.g., ISO 9001, ISO 14001, ISO 45001, ISO 27001, IATF 16949, etc.), to apply specific codes of ethics, conduct or ethics (e.g., Code of Business Ethics).</i></p> <p>Lawfulness: These processing operations are carried out in accordance with Article 6(1)(f) of the GDPR on the basis of the Legitimate Interest of the Data Controller.</p> <p>Origin of data: The data processed are generally collected for purposes F1, F2 and F3. However, additional data may be collected by us or provided by you and/or your organization, during the ongoing relationship.</p> <p>Duration of processing: Subject to the exercise of your right to object, Processing will last for the duration of the business relationship or until the legitimate interest pursued by the Data Controller is achieved.</p> <p>Further retention: If deemed appropriate and lawful, at the end of the processing, your personal data may be further anonymised (see purpose F7) or stored for civil or judicial reasons (see purpose F5).</p> |

Purpose: *To take protective actions to protect the interests of the Company or those of third parties such as, for example, to exercise defense in court and/or enforce rights.*

Lawfulness: These processing operations are carried out in accordance with Article 6 paragraph 1 letter f) of the GDPR on the basis of the Legitimate Interest of the Data Controller.

F5 **Origin of data:** The data subject to the retention processing are conferred or collected for all the purposes stated in this document.

Duration of processing: Until the protection purposes are fulfilled.

Retention: We will retain your personal data for the prescriptive period provided by the legislation for the protection of related rights, subject in any case to longer retention periods provided by specific sector regulations. In particular, the data will be processed and/or retained for a time of **10 (ten) years** from the closing of the contract, the termination of the relationship or the achievement of the purposes of collection.

Purpose: *To protect and ensure the delivery of our IT services and information and support assets, such as performing logical access control, protecting IT systems from malware, fighting repudiation and misuse, etc.*

Lawfulness: These treatments are carried out pursuant to art. 6 par. 1 letter f) of the GDPR on the basis of the Legitimate Interest of the Owner.

F6 **Origin of data:** These processing operations are carried out in accordance with Article 6 Paragraph 1 (f) of the GDPR on the basis of the Legitimate Interest of the Data Controller.

Duration: We will process your personal data for as long as is strictly necessary to achieve the purposes of collection (maximum 6 months, except for processing due to specific needs attributable to other processing purposes covered by this policy)

Retention: Data will be deleted within 6 months of collection. This is without prejudice to additional retention periods provided for the purpose **F5**

Purpose: *Anonymization for internal analysis and statistical purposes. Under certain circumstances, for processing for purposes **F1, F2, F3, F4 and F6**, we may anonymize some data so that it can no longer be associated with you; in such cases it will be possible for us to use such data without further notice to you and retain it indefinitely. We will only perform anonymization if we are able to ensure and demonstrate over time that we cannot associate such data with you again (e.g., through Reverse Engineering techniques).*

F7 *For example, the data may be used to process market, quality, security, website access, etc. statistics. Should the use of your anonymized data be required to feed statistics that might fall outside of your legitimate expectations, we will provide you with specific information and collect your consent if necessary.*

Lawfulness: This anonymization processing will be carried out in accordance with Article 6 par. 1 letter f) of the GDPR on the basis of the Legitimate Interest of the Data Controller.

Origin of data: Collected for the purposes **F1, F2, F3, F4, and F6**

Duration and Retention: We will retain and use the anonymized data indefinitely.



If, during the existing relationship, further and specific processing, not indicated in this information notice, should become necessary, it will be the responsibility of Ai ENGINEERING to provide you and/or your Organization with a specific information notice in advance and, if appropriate, proceed to acquire the necessary consent. This principle will also be applied if the processing of special categories of data (ex art. 9 of the GDPR) or the processing of personal data related to criminal convictions and offenses (ex 10 of the GDPR) is necessary and lawful for supplier qualification if this is appropriate and required by law (e.g., if required by specific calls for tenders).

7 PRINCIPLES APPLICABLE TO DATA PROCESSING

From the stage of collection of information, any processing carried out by us will respect the principle of relevance and non-excessiveness by virtue of the purposes pursued by the same. We would like to inform you that access to your personal data by the persons we appoint, is permitted only if the knowledge is considered strictly essential to the pursuit of the purposes outlined in this document.

8 MANDATORY OR OPTIONAL NATURE OF DATA PROVISION

For the purposes **F1** and **F2** of this policy, the provision of personal data is a necessary requirement and any refusal to provide the requested information, could totally or partially prevent the performance of activities aimed at the fulfillment of the commercial supply contract, or the fulfillment of legal obligations, regulations arising from EU legislation, or arising from instructions issued by public authorities or supervisory bodies. By way of example, our Company may be prevented from selecting you or your organization as a Supplier

9 MORE INFORMATION ON STORAGE

Except as stated in [paragraph 6](#) of this policy, for organizational reasons, data will be deleted/destroyed or anonymized within **90** days of the expiry of the retention periods.

10 DATA PROCESSING METHODS

With logics strictly related to the purposes of collection, in Ai ENGINEERING we adopt and observe strict procedures and security measures to store, use and allow you to view your personal data by means of paper, computer and telematic tools, so as to always guarantee their protection from unauthorized or illegal processing and from accidental loss, destruction or damage. In particular, your data are:

- collected exclusively for the stated purposes and subsequently processed in accordance with those purposes;
- adequate, relevant and limited with respect to the purposes stated above (“so-called data minimization”);
- accurate and, if necessary, updated, deleted and/or corrected, also according to your possible indications;
- used and kept for a period of time not exceeding the achievement of the purposes for which they are collected.

10.1 Automated decisions



To achieve the purposes of this disclosure, Ai ENGINEERING does not implement automated decisions based on your personal data.

10.2 Safety



Ai ENGINEERING has taken steps to census the risks to the rights and freedoms of the data subjects involved in the processing declared in this information notice, also considering the risks impending on the information systems used for such processing. The risks were subsequently assessed, analyzing the sources of risk and mitigating the threats capable of materializing them through the adoption of technical and organizational measures deemed appropriate.

11 SCOPE OF DATA COMMUNICATION AND DISSEMINATION

For the pursuit of the purposes stated in this document and within the limits of what is strictly necessary, Ai ENGINEERING makes use of the activities of external subjects with whom special agreements on the processing of personal data are stipulated to regulate the relations of **Ownership/Responsibility** under the Regulations (e.g. external subjects who carry out technical, commercial, legal, administrative consulting activities, companies that provide Cloud IT services, data processing, shipping and transportation services, banks, agencies, public administrations, authorities, supervisory bodies, etc.).

Internally, individuals involved in the processing activities of your personal data are bound to confidentiality, properly trained and appointed as **“Authorized”** subjects for processing.

Subject to any legal obligations, **your personal data will not be disseminated in any way.**

For more information about the subjects who may become aware of your personal data, you may contact our Corporate Data Protection Coordinator.

12 TRANSFER OF DATA ABROAD

For the purposes stated in this policy, Ai ENGINEERING does not transfer your Data outside the European Economic Area (EEA). However, should your Personal Data be transferred to countries outside the European Economic Area (EEA), in the absence of adequacy decisions from the European Union Commission, our Company will ensure that appropriate safeguards are in place to protect your Personal Data in those countries. Some of the safeguards that may be adopted, where appropriate, include the use of standard contractual clauses approved by the European Commission, pseudonymization and if possible, encryption of the data itself.

By way of example, but not limited to, we inform you that the transfer abroad of your personal data is often related to the use of cloud technologies, digital communication systems, security software and protection of IT services. In these cases, our Company is committed to using services chosen from operators that guarantee higher standards of security and attention to the protection of personal data.

In this regard, we would like to inform you that Ai ENGINEERING uses some ICT services, provided by US companies such as Microsoft, Google Apple who act as our Data Processors according to art 28 of the GDPR.



For this reason, we have signed service contracts and “Data Processing Agreements” (DPAs) with these companies, which also include the ‘Standard Contractual Clauses” (SCCs) established by the European Commission pursuant to art. 46(1) GDPR.

However, while selecting, where possible, the provision of such services through Data Centers located within the EEA, the Data Processor may have to allow U.S. authorities access to our data as a result of the so-called “Cloud ACT.”

13 RIGHTS OF THE INTERESTED PARTY

As a data subject, you may at any time exercise the rights granted to you by Articles 15 to 22 of the Regulations. In particular, in the manner and within the limits of the law, you have the right to request from our Company for access to your personal data, rectification, cancellation or restriction of the processing of personal data concerning you and to object to their processing. You may use the contact channels provided in this document to exercise your rights.



You can obtain further information on the rights applicable to the processing declared in this information in [ANNEX A](#)

14 COMPLAINT TO THE SUPERVISORY AUTHORITY (ART. 77 GDPR)

Without prejudice to the possibility of contacting Ai ENGINEERING to obtain any information or to exercise your rights, we inform you that you may lodge a complaint before the competent independent administrative authority in the Member State of the European Union where you normally reside, where you work, or where you believe an alleged violation of the law on the protection of your personal data has occurred. In the Italian territory, you may file a complaint with the Italian Data Protection Authority. For information on how to submit your complaint to the 'authority you can use the following contact details:



Guarantor for the protection of personal data

Phone Number: +39 06.696771

E-mail address: guarantor@gdpd.it

PEC address: protocollo@pec.gdpd.it

Website: <https://www.garanteprivacy.it>

15 INFORMATION UPDATE

This policy, **INF-DPMS.03 “SUPPLIERS PRIVACY DISCLOSURE” Rev. 01** effective **10/26/2022**, supersedes the previous one issued on 05/25/2018. The document is revised periodically according to regulatory and/or company changes.

In case of changes in its fundamental parts (such as purposes, modalities, to whom we communicate the data, where we transfer them, etc.) it will be the responsibility of our Company to inform the candidate of the change.



You can find the updated version of this policy on Ai ENGINEERING’s institutional corporate website at the following link: <https://aigroup.it/privacy>

ANNEX A

GUIDE TO THE EXERCISE OF RIGHTS APPLICABLE TO THE TREATMENTS DECLARED IN THE SUPPLIER INFORMATION NOTICE INF-DPMS.03 VER. 2 OF 26/10/2022

RIGHT OF ACCESS (art. 15 GDPR)

As a data subject, you have the right to obtain confirmation as to whether or not we are processing personal data concerning you and, if so, to obtain access to the following information:

1. the purposes of the processing;
2. the categories of personal data concerned;
3. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
4. when possible, the expected period of retention of personal data or, if this is not possible, the criteria used to determine this period;
5. the existence of the data subject's right to request from the data controller the rectification or erasure of personal data or the restriction of the processing of personal data concerning him or her or to object to their processing
6. the right to lodge a complaint with a supervisory authority;
7. if the data have not been provided directly by you, all available information about their origin;
8. the existence of automated decision-making, including profiling, and, at least in such cases, meaningful information about the logic used, as well as the consequences of such processing for you;
9. if your personal data are transferred to a third country or international organization, you have the right to be informed of the existence of adequate safeguards in accordance with Articles 45-50 of the GDPR.



Your right to obtain a copy of the data will only be allowed if it can be done without infringing on the rights and freedoms of others. Should you decide to exercise this right, we will provide you with a copy of the personal data being processed. **If you request additional copies, we may charge you a fee based on the administrative costs we incur.**

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of its basis of lawfulness. In particular:



Conditions of non-applicability

- The right does not apply to data already anonymized for **F7 purposes**

RIGHT OF RECTIFICATION (art. 16 GDPR)

You have the right to obtain from us the modification and updating of your personal data without undue delay. Taking into account the purposes of the processing, you have the right to obtain the integration of your incomplete personal data, also by providing us with a supplementary statement.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of their basis of lawfulness. In particular, it is applicable to the following processing:



Conditions of non-applicability

- The right is not directly applicable to the processing carried out for purposes **F4, F5, F6 and F7**, as the data collected for purposes **F1, F2 and F3 are used for such processing**.



RIGHT TO ERASURE «RIGHT TO BE FORGOTTEN» (art. 17 GDPR)

You have the right to obtain the cancellation of personal data concerning you without undue delay.

Conditions of applicability

We grant this right for the following treatments, when one of the following applies:

1. when the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed:

| | | | | | | | |
|-------------------------------------|----|----|----|----|----|----|----|
| <input checked="" type="checkbox"/> | F1 | F2 | F3 | F4 | F5 | F6 | F7 |
|-------------------------------------|----|----|----|----|----|----|----|

Specific conditions of non-applicability

The right does not apply to data already anonymized for **F7 purposes**

2. if you have withdrawn the consent on which the processing is based and there is no other legal basis to continue it in the absence of your authorization. The right does not apply to any of the processing declared in this notice.

| | | | | | | | |
|-------------------------------------|----|----|----|----|----|----|----|
| <input checked="" type="checkbox"/> | F1 | F2 | F3 | F4 | F5 | F6 | F7 |
|-------------------------------------|----|----|----|----|----|----|----|

Specific conditions of non-applicability

The right is not applicable as none of the processing declared in the information is based on the consent of the interested party.

3. if you object to the processing and there are no legitimate grounds for us to continue with the processing anyway:

| | | | | | | | |
|-------------------------------------|----|----|----|----|----|----|----|
| <input checked="" type="checkbox"/> | F1 | F2 | F3 | F4 | F5 | F6 | F7 |
|-------------------------------------|----|----|----|----|----|----|----|

Specific conditions of non-applicability

The right does not apply to the processing carried out for purposes **F1** and **F2** as they are not based on legitimate interest and to data already anonymised for purposes **F8**

4. if the personal data were processed unlawfully:

| | | | | | | | |
|-------------------------------------|----|----|----|----|----|----|----|
| <input checked="" type="checkbox"/> | F1 | F2 | F3 | F4 | F5 | F6 | F7 |
|-------------------------------------|----|----|----|----|----|----|----|

5. where personal data must be erased to comply with a legal obligation to which we are subject as Data Controllers:

| | | | | | | | |
|-------------------------------------|----|----|----|----|----|----|----|
| <input checked="" type="checkbox"/> | F1 | F2 | F3 | F4 | F5 | F6 | F7 |
|-------------------------------------|----|----|----|----|----|----|----|

Specific conditions of non-applicability

The right does not apply to data already anonymized for **F7 purposes**

6. where the personal data have been collected in relation to the offer of information society services.

| | | | | | | | |
|-------------------------------------|----|----|----|----|----|----|----|
| <input checked="" type="checkbox"/> | F1 | F2 | F3 | F4 | F5 | F6 | F7 |
|-------------------------------------|----|----|----|----|----|----|----|

Specific conditions of non-applicability

The right does not apply to any of the treatments stated in this notice.

RIGHT OF LIMITATION OF THE TREATMENT (art. 18 GDPR)

This right is guaranteed for all processing by us regardless of the lawful basis used.



Personal data subject to limitation, are processed, except for storage, only with your consent or for the establishment, exercise or defense of a right in court or to protect the rights of another natural or legal person. In addition, we inform you that if you have obtained a restriction of processing, you will be informed by the data controller before the restriction is lifted.

Conditions of applicability

You have the right to obtain the limitation of processing when one of the following applies:

1. You have disputed the accuracy of the personal data; the restriction will apply for a period enabling us to verify the accuracy of the personal data.



Specific conditions of non-applicability

The right does not apply to data already anonymized for **F7 purposes**

2. the processing is unlawful and you oppose the erasure of your personal data and request instead that their use be limited



Specific conditions of non-applicability

The right does not apply to data already anonymized for **F7 purposes**

3. although we no longer need it for processing purposes, the personal data is necessary for you to establish, exercise or defend a right in court



Specific conditions of non-applicability

The right does not apply to data already anonymized for **F7 purposes**

4. You have objected to the processing; the restriction will be applied pending verification as to whether our legitimate grounds for its continuation prevail.



Specific conditions of non-applicability

The right does not apply to data already anonymized for purposes **F7** and to processing carried out for purposes **F1** and **F2** as they are not based on legitimate interest.

RIGHT TO NOTIFICATION (art. 19 GDPR)

You have the right to obtain direct communication from us to each of the recipients to whom your personal data have been transmitted, regarding your requests for rectification or erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort. In addition, if you consider it appropriate, you have the right to obtain a list of the recipients of your data.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of the lawful basis used.



Specific conditions of non-applicability

The right does not apply to anonymised data for **F7 purposes**

RIGHT TO DATA PORTABILITY (art. 20 GDPR)

You have the right to receive in a structured, commonly used and machine-readable format the personal data concerning you provided to us and you have the right to obtain from us the direct transmission of such data to another Data Controller if technically feasible.

Conditions of applicability

This right is only guaranteed for processing that has consent or contract as its legal basis and is carried out by automated means

| | | | | | | | |
|-------------------------------------|----|----|----|----|----|----|----|
| <input checked="" type="checkbox"/> | F1 | F2 | F3 | F4 | F5 | F6 | F7 |
|-------------------------------------|----|----|----|----|----|----|----|

Specific conditions of non-applicability

The right does not apply to the processing carried out by us

RIGHT TO OBJECT (art. 21 GDPR)

You have the right to object at any time to the processing of your personal data based on our legitimate interest, including profiling.



We will only refrain from further processing your personal data if we are unable to demonstrate the existence of legitimate reasons overriding your interests, rights and freedoms. Processing will continue even if the data are necessary for the establishment, exercise or defense of a right of ours or of third parties in litigation.

Conditions of applicability:

The legal basis for the processing must be legitimate interest. The right is applicable to the following processing:

| | | | | | | | |
|-------------------------------------|----|----|----|----|----|----|----|
| <input checked="" type="checkbox"/> | F1 | F2 | F3 | F4 | F5 | F6 | F7 |
|-------------------------------------|----|----|----|----|----|----|----|

Specific conditions of non-applicability

The right does not apply to the processing carried out for purposes **F1** and **F2** as they are not based on legitimate interest and to the processing carried out for purpose **F5** as they are necessary for the ascertainment and defense in litigation.

SPECIFIC RIGHTS IN THE CASE OF AUTOMATED DECISION-MAKING PROCESSES (art. 21 GDPR)

You have the right not to be subjected to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or significantly affects you in a similar way. In addition, you have the right to obtain human intervention from the Controller, to express your opinion and to challenge the automated decision.

In any case, decisions must not be based on the special categories of personal data referred to in Article 9(1) of the GDPR, unless Article 9(2)(a) or (g) of the GDPR applies and appropriate measures are in place to protect your rights and freedoms.

Conditions of applicability

The right does not apply if the decision:

- is necessary for the conclusion or performance of a contract between us;
- is based on your explicit consent.
- the decision is authorised by Union or Member State law.

| | | | | | | | |
|-------------------------------------|----|----|----|----|----|----|----|
| <input checked="" type="checkbox"/> | F1 | F2 | F3 | F4 | F5 | F6 | F7 |
|-------------------------------------|----|----|----|----|----|----|----|

Specific conditions of non-applicability

The right does not apply to any of the processing operations stated in this notice as none of them subject the data subject to a decision based solely on automated processing.

RIGHT TO COMPENSATION FOR DAMAGES (art. 82 GDPR)



We inform you that anyone who suffers material or immaterial damage caused by a violation of Regulation (EU) 2016/679 has the right to obtain compensation for such damage.

FORMS FOR THE EXERCISE OF RIGHTS

To exercise your rights towards the Joint Controller companies, we recommend that you use the following form made available to you by the Data Protection Authority. We remind you that your identification is always necessary on our part.
<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

End of Document