

## PRIVACY POLICY – CUSTOMERS AND SUPPLIERS

Dear Sir/Madam (hereinafter the Data Subjects)

*The following paragraphs provide a series of information useful to understand how we process personal data, in compliance with the provisions on data protection and the principles of lawfulness, fairness, transparency, purpose limitation and storage, data minimization, accuracy, integrity and confidentiality.*

### 1. DEFINITIONS

<b>Privacy legislation (applicable to the protection of personal data)</b>	Set of all legislation referring to the protection of personal data: EU Regulation 679/2016 (GDPR or RGPD), D.Lgs. 196/2003 (Code), D.Lgs. 101/2018, D.Lgs. 51/2018, Guidelines of the EDPB (formerly WP29), deontological rules and general authorizations of the Data Protection Authority, measures of the Data Protection Authority where applicable, international regulations of scope
<b>Processing</b>	Any operation or set of operations, performed whether or not by automated means, applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission/dissemination or any other form of making available, comparison or interconnection, restriction, erasure or destruction.
<b>Data Controller</b>	The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of the processing of personal data.
<b>Personal Data</b>	Any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is any natural person who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more characteristic elements of his or her identity: physical physiological, genetic, mental, economic, cultural or social.
<b>Special categories of personal data (formerly sensitive)</b>	Personal information relating to ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health status, life or sexual orientation of the data subject, as well as genetic, biometric and geo-location information.
<b>Data related to criminal convictions and offenses</b>	Personal information related to criminal convictions, felonies, or related security measures.

## 2. THE DATA CONTROLLER

POLI.design Srl (hereinafter POLI.design) - located in Via Don Giovanni Verità n. 25, 20158 Milan; VAT number 12878090153 – is the Data Controller, in the person of the pro-tempore Legal Representative, of your personal data as defined in the **DEFINITIONS** paragraph of this document. For any information you may contact him at the e-mail address [privacy@polidesign.net](mailto:privacy@polidesign.net).

The Data Controller has proceeded to identify and appoint a Data Protection Officer or Data Protection Officer (hereinafter DPO), who is available at the e-mail address [dpo@polidesign.net](mailto:dpo@polidesign.net).

## 3. ORIGIN OF YOUR DATA and CATEGORY OF DATA COLLECTED.

The Data Controller, for the purpose of establishing and managing relationships with customers, suppliers and educational partners will process non-particular data. Specifically, POLI.design processes your personal, contact and tax data. These data are collected directly from the data subjects.

## 4. PURPOSE OF THE PROCESSING and LEGAL BASIS OF THE PROCESSING.

Your personal data are processed for the administrative management of customers and suppliers that the Controller uses.

Your common data are processed without your express consent (Art. 6 GDPR) for the following purposes:

- Fulfilling pre-contractual and contractual obligations arising from existing relationships with you;
- Fulfilling legal obligations in tax matters;
- To exercise the rights of the Controller.

However, in the case of educational partners, it is specified that they will only be able to process data with regard to the competencies, outlined within the appointment's ex art. 28 GDPR, or the appointments as appointees due to them. Therefore, for any further data processing they will necessarily have to request consent from POLI.design.

## 5. MANDATORY REPORTING OF DATA

The provision of personal data is compulsory for the purposes contained in the **PURPOSE OF THE PROCESSING** and **LEGAL BASIS OF THE PROCESSING** section of this policy and does not require consent; however, in the absence of such data, the Controller will not be able to conclude supply agreements with you.

## **6. PLACE OF DATA PROCESSING and MODALITIES OF DATA PROCESSING.**

Your data are processed within the European Union. All processing operations are carried out by means of IT/electronic tools, including automated tools, and on paper. In case of transfer to non-EU territory, the Data Controller will take care to adopt all the guarantees provided by the GDPR in this regard.

All processing operations are carried out by means of IT Technology/electronic, including automated, and paper-based tools.

## **7. SUBJECTS AUTHORIZED TO PROCESS**

Your data are processed by employees and collaborators (the persons authorized to process, i.e., former appointees) working under the authority of POLI.design.

## **8. COMMUNICATION OF YOUR DATA TO THIRD PARTIES**

The Data Controller may communicate your data to the Public Administration, Revenue Agency and/or Judicial Authorities, as well as to all other subjects to whom the communication is obligatory or necessary by law.

Outside of these subjects, who may come into contact with your personal data by virtue of the existing relationship with POLI.design, which has specifically appointed them as "Data Processors" pursuant to Article 28 of the GDPR, the aforementioned data will not be communicated to other subjects or disseminated. The list of Data Processors can be consulted upon request.

## **9. RETENTION PERIOD OF COLLECTED DATA**

Personal data will be kept for 10 (ten) years from the date of last contact (in accordance with the provisions of Article 2220 of the Civil Code) and will be stored within the in-house server

and SAAS.

## 10. YOUR RIGHTS

The Data Subjects have the right to obtain, in the cases provided for, access to their personal data and the rectification and/or cancellation of such data and/or the limitation of the processing that concerns them and/or to oppose the processing (Articles 15 et seq. of the GDPR). The appropriate request is to be submitted directly to POLI.design at the contact details indicated in the paragraph **DATA CONTROLLER** of this policy. The Data Subjects who believe that the processing of personal data, carried out according to the methods indicated herein, takes place in violation of the provisions of the GDPR, have the right to lodge a complaint with the Supervisor Authority, as provided for in Art. 77 of the GDPR itself, or to take appropriate legal action (Art. 79 of the GDPR).