

Privacy policy regarding the processing of suppliers' personal data

Servizi Italia S.p.A., with registered office in Castellina di Soragna (PR), Via San Pietro 59/B – 43019, Tax ID Code 08531760158 and VAT No. 02144660343, acting as the Data Controller (hereinafter, the “**Controller**”), hereby notifies you, in accordance with Regulation (EU) 2016/679 (hereinafter, the “**GDPR**”) and the applicable Italian legislation on the protection of personal data, that your personal data (if concerning natural persons or sole proprietorships) will be processed in the following ways and for the following purposes:

1. Scope of data processing

The Data Controller processes the personal identification data communicated by you – in particular, first name, last name, company name, address, email address, telephone number, VAT number, tax and social security compliance data (the DURF certificate of tax compliance and the data contained therein, salary, withholdings, F24 payments, F24 form details, the DURC certificate of social security compliance), etc. – or identification data concerning the directors and/or legal representatives of supplier companies and/or of anyone acting in the name and on behalf of same, provided to the Data Controller, or otherwise acquired by same, based on the contractual relationship with the Data Controller;

Pursuant to Article 10 of the GDPR, the scope of data processing further includes personal data relating to convictions under Legislative Decree no. 231/01 and corruption-prevention information; hereinafter, “**Personal Data**” or “**Data**”.

2. Purposes and legal bases of data processing

Your Data shall be processed without your prior consent for the following purposes and on the following legal bases:

- Implementation of the contract and/or of pre-contractual commitments, in particular to:
 - manage pre-contractual and contractual relations;
 - implement the contract;
 - manage cash collections and payments.

- Fulfilling the Controller’s legal obligations, such as:
 - compliance with obligations set forth by laws, regulations and national or EU legislation, or provisions issued by the competent authorities;
 - filling out and processing tax returns and related formalities;
 - compliance with the obligations under Article 17-bis, paragraph 1 of Italian Legislative Decree no. 241/97 concerning checks on withholding taxes in contracts;
 - account keeping and related obligations.

- Pursuing the legitimate interest of the Data Controller, in particular to:
 - exercise the Controller’s rights in court and manage any disputes;
 - prevent and repress illegal acts;

SERVIZI ITALIA S.P.A. - SEDE LEGALE E AMMINISTRATIVA

VIA SAN PIETRO, 59/B - 43019 CASTELLINA DI SORAGNA (PR) - T. +39 0524 598511

WWW.SERVIZITALIAGROUP.COM - SEDE@SI-SERVIZITALIA.COM - PEC: SI-SERVIZITALIA@POSTACERT.CEDACRI.IT

CAPITALE SOCIALE € 31.809.451,00 I.V. - REG. IMPR. PARMA C.F. 08531760158 - P.IVA 02144660343

SOCIETÀ SOTTOPOSTA ALL'ATTIVITÀ DI DIREZIONE E COORDINAMENTO DA PARTE DI COOPSERVICE S. COOP. P. A., CON SEDE LEGALE IN REGGIO EMILIA, VIA ROCHDALE N. 5, TITOLARE DEL NUMERO 00310180351 DI CODICE FISCALE, ISCRIZIONE NEL REGISTRO DELLE IMPRESE DELL'EMILIA E PARTITA IVA, NONCHÉ DEL NUMERO 128740 DI ISCRIZIONE AL R.E.A.



- comply with the applicable prescriptions and internal procedures in accordance with the Organisational Model pursuant to Legislative Decree no. 231/01, as adopted by the company;
- comply with the anti-corruption due diligence process and maintain anti-corruption certification.

In the case of processing for purposes other than those indicated above, the Data Controller, pursuant to Article 13, para. 3 of the GDPR, will provide the data subject with comprehensive information regarding these different purposes.

3. Types of Data processing

Your Personal Data will be processed both in hard copy and in electronic form by collecting, recording, organising, storing, consulting, processing, amending, selecting, extracting, comparing, using, interconnecting, blocking, communicating, deleting or destroying the data.

4. Data Retention

The Controller will use your Personal Data for the time needed to achieve the purposes stated above and, in any case, for no longer than 10 years from the end of the contract.

5. Data Provision

The provision of Data is mandatory, and any refusal to do so makes it impossible to establish or maintain the contractual relationship with the Data Controller.

6. Access to Data

Your Data may be accessed for the above-mentioned purposes by:

- employees and/or contractors working for the Data Controller, in their capacity as data processors and/or system administrators;
- companies of the Group and third parties (e.g. credit institutions, legal, tax and commercial firms, hardware and data processing and maintenance companies, etc.) to which activities are outsourced on behalf of the Controller, in their capacity as external data processors.

7. Disclosure of Data

Your Data may be shared, even without your consent, with supervisory bodies, the police or law enforcement agencies, the Ministry of Finance, the Revenue Agency, ministerial institutions and competent authorities, local (regional, provincial, municipal) authorities, regional and provincial tax offices, at their request, which will process same in their capacity as independent data controllers for institutional purposes and/or by virtue of the law and when carrying out audits and investigations. Your Data may also be shared with third parties (e.g. partners, independent contractors, etc.), in their capacity as independent data controllers, in order to carry out activities for the above purposes.

8. Data Transfer

Your Data shall not be disclosed to countries outside the EU.

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9. Existence of automated decision-making processes

The Data Controller shall not use automated decision-making processes in connection with your Data.

10. Rights of the Data Subject

The Data Controller informs you that, as the data subject, unless specific legal requirements apply, you have the right:

- to obtain confirmation of the existence of personal data concerning you, even if not yet recorded, and that such data be provided to you in an intelligible form;
- to obtain information on and, if necessary, copy of: a) the origin and category of the personal data; b) the logic applied where data processing is carried out using electronic devices; c) the purposes and methods of data processing; d) the particulars of the Data Controller and of the processors; e) the individuals or categories of individuals to whom the personal data may be disclosed or who may gain access to same, especially third-country recipients or international organisations; f) where possible, the period of time the personal data will be stored or the criteria used to determine that period; g) the existence of an automated decision-making process, including profiling, and, if this is the case, the logic applied, and the significance and consequences for the data subject; h) the existence of adequate guarantees where the data is transferred to a country outside the EU or to an international organisation;
- to obtain, without undue delay, the updating and rectification of inaccurate data or, when requested, the integration of incomplete data;
- to withdraw, at any time, the consents given in an easily accessible form and without impediment, using, if possible, the same means used to provide them;
- to obtain the erasure, encryption or blocking of data: a) that is processed unlawfully; b) that no longer needs to be stored for the purposes for which it was collected or subsequently processed; c) for which consent on which the processing is based has been withdrawn and where there is no other legal ground for the processing; d) whose processing you object to and there are no overriding legitimate grounds for the processing; e) where there has been a failure to comply with a legal obligation; f) that relates to minors. The Data Controller may refuse to erase the data only when: a) exercising the right of freedom of expression and information; b) complying with a legal obligation, carrying out a duty in the public interest or exercising official authority; c) there is a public health issue; d) archiving is necessary in the public interest, for scientific or historical research purposes, or for statistical purposes; e) exercising or defending legal claims;
- to obtain restriction of processing when: a) the accuracy of the personal data is contested; b) the Data Controller has unlawfully processed the data in order to prevent its erasure; c) your rights are being exercised in court; d) verifying that the Data Controller's legitimate grounds override those of the data subject;
- to obtain access to the data, when processed by automated means, without hindrance and in a structured, commonly used and machine-readable format in order to be able to transmit such data to another controller or, if feasible, to obtain direct transfer of the data from the Data Controller to another controller;
- to oppose, in whole or in part, on legitimate grounds related to your particular situation, the processing of personal data concerning you, even though relevant to the purposes for which it was collected;

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- to lodge a complaint with the Data Protection Authority.

In the above-mentioned cases, where necessary, the Data Controller shall ensure that third parties to whom your personal data is disclosed or shared are duly informed whenever you exercise your rights, except in specific cases (e.g. where this proves to be impossible or would involve a disproportionate effort with respect to the protected right).

11. Methods of exercising rights

You may exercise your rights at any time:

- by sending a registered letter with return receipt to the Data Controller's address at: Servizi Italia S.p.A., Castellina di Soragna (PR), Via San Pietro 59/B – 43019
- by sending an email to privacy@si-servizitalia.com;
- by calling: (+39) 0524 598511.

12. Data Controller

The Data Controller is:

- **Servizi Italia S.p.A.**, with registered office in Castellina di Soragna (PR), Via San Pietro 59/B – 43019, Tax ID Code 08531760158 and VAT No. 02144660343.

13. Data Protection Officer (DPO)

The Data Protection Officer (DPO) can be contacted via email to dpo@si-servizitalia.com.

An up-to-date list of data processors is kept at the Data Controller's registered office in Via San Pietro 59/B – 43019 Castellina di Soragna (PR).

Castellina di Soragna, 26 March 2026

**The Data Controller
Servizi Italia S.p.A.**

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