

## **Cabro S.p.A**

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### **Information statement pursuant to and for purposes of art. 13-14 of EU GDPR (General Data Protection Regulation) 2016/679 concerning the protection of personal data.**

#### **Concerned subjects/Data subjects: suppliers.**

Cabro S.p.A., acting in its capacity as Data Controller as regards Your personal data, pursuant to and for purposes of EU GDPR (General Data Protection Regulation) 2016/679 concerning the protection of personal data hereinafter referred to as GDPR, herewith informs You that that the above mentioned norm provides for the protection of the concerned persons as regards the processing of their personal data and that such processing shall be performed in compliance with the principles of fairness, lawfulness, transparency and protection of Your privacy and of Your rights.

Your personal data shall be processed in accordance with the legislative provisions of the above-mentioned Norm and of the confidentiality obligations therein provided for.

Purposes and legal base of the data processing: in particular, the processing of Your personal data shall be performed for the following purposes connected with the fulfillment of obligations as provided for by the law, by regulations and by contractual obligations:

- fulfillment of fiscal and tax obligations and/or filing and accounting obligations;
- for the purposes of supplier management
- for the purposes of quality management
- fulfillment of obligations as provided for by legislation in force
- for the purposes of the planning of activities
- for the purposes of the management of supplier invoicing.

Data-processing methods: data processing of Your data shall take place according to the following methods:

- Entrusting of third parties with the data-processing procedures
- Processing by means of electronic computing devices
- Manual processing by means of archives on paper.

Each data-processing procedure is performed in compliance with the methods pursuant to articles 6, 32 of the GDPR and by adopting suitable safety measures as provided for in the Norm.

Your data will be solely processed by staff having been specifically authorized by the data controller and in particular by the following categories of employees in charge of it:

- Goods Receipt;
- Management;
- Purchasing office;
- Administration office;
- Sales office

- Finance Department – Precious metals trading office

Communication/dissemination: your data can be communicated to external (non-company) third parties for the purposes of a correct management of the business relationship and especially to the following categories of recipients among whom all duly mentioned Persons/Institutions in Charge of Data Processing:

- banks and credit institutions;
  - consultants and (free lance) professionals, also operating as associated professional firms;
  - within the framework of public and/or private sector entities for which data communication is compulsory or necessary in order to fulfill and comply with legal obligations or it is any way function in order to manage the business relationship;
  - forwarding agents, carriers, self-employed lorry owners and drivers, post offices, logistics companies.
- Printed on the 27<sup>th</sup>/November/2018

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Last modification **27<sup>th</sup> /11/2018 INFORMATION STATEMENT** Doc. Code. **11232.51.351938.1290260**

Dissemination/Spreading: your personal data won't be spread or disseminated in any way.

Data retention period. We herewith inform you that in compliance with the principles of lawfulness, limitation of the purposes and data minimization pursuant to article 5 of GDPR, the data retention period of Your personal data is:

- established for a period of time which shall not exceed the time necessary for the fulfillment and the achievement of the purposes for which they had been gathered and processed in order to fulfill contractual purposes;
- established for a period of time which shall not exceed the time necessary for the fulfillment and the achievement of the purposes for which they had been gathered and processed and in compliance with the compulsory period of time as provided for by the law.

Data Controller: the Data Controller for the processing of your data in compliance with the Law is Cabro S.p.A (Via Setteponti 141 , 52100 Arezzo (AR); e-mail: info@cabro.it; telephone number: 0575984442; VAT number: 01217730512) in the person of its pro tempore legal representative.

You are entitled to achieve from the data controller **the erasure of personal data** («right to be forgotten»), the limitation/restriction, the update, the **rectification** and integration, the portability of your personal data, you will as well have the right to object (to withdraw your consent) against the processing of personal data concerning you and in general you can enforce any right so as provided for by articles 15, 16, 17, 18, 19, 20, 21, 22 of GDPR.

### **UE Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 – Rights of the Data Subject (Concerned Person)**

1. The Data Subject (Concerned Person) shall have the right to obtain the confirmation as to whether or not personal data concerning him or her are being processed, even if they haven't been registered yet, the communication of those data in an intelligible form and the right to lodge a complaint with the Supervisory Authority.

2. The Data Subject is entitled to achieve information:

- a. about the origin of the personal data;
- b. about the processing purposes and methods;
- c. about the logic applied to the processing in case the processing is performed by means of electronic devices;
- d. about identification details of the data controller, of the data supervisors, and of the appointed representative in compliance with article 5, subsection 2;
- e. about the subjects or categories of subjects to whom personal data can be communicated or who can come to know about the personal data in their capacity as appointed representative within the territory of the State, or of persons in charge of the processing procedures.

3. The data subject has the right to achieve:

- a. The updating, the rectification or in case he/she has got an interest in it, the integration of data;
- b. The erasure, the transformation into an anonymous form or the blocking of data being unlawfully processed, including those data for which storage/retention is not necessary in connection with the purposes according to which the data have been collected or subsequently processed;
- c. The statement confirming the fact that the procedures mentioned at letters a) and b) have been communicated also as regards their content to those persons/subjects to whom the data were communicated or disseminated, except for the case in which this fulfillment would turn out to be impossible to be performed or would imply a clearly disproportionate use of means as compared to the protected right ;
- d. the data portability.

4. The data subject has the right to oppose, completely or in part

- a. due to legitimate grounds, against the processing of personal data concerning him or her, even if they are relevant to the purposes of data collection;
- b. against the processing of personal data concerning him or her in case the data have been collected for the purposes of the forwarding of advertising materials or of direct-sale materials or of marketing research or of business communication.