

# PERSONAL DATA PROCESSING DISCLOSURE CUSTOMERS/SUPPLIERS (FOR NATURAL PERSONS ONLY)

The companies **Carraro S.p.A.**, **Carraro Drive Tech S.p.A.**, **Driveservice S.r.l. and SIAP S.p.A.** (hereinafter each individually as "Company"), pursuant to Art. 13 of EU Regulation no. 679/2016, wish to inform you that your customer/supplier data will be processed as reported below.

Keep in mind that <u>each of the companies listed above is considered the Controller of the data processing (hereinafter also "Controller") to the extent and within the limits in which you maintain relations with the same.</u>

#### 1. Data Controller

The Data Controller is the Company, in the person of its legal representative *pro tempore*, with registered offices as following:

- **Carraro S.p.A.**: via Olmo 37, Campodarsego, PD, tel. +39 049 9219111, certified email address <u>carraro.group@legalmail.it</u>;
- Carraro Drive Tech S.p.A.: via Olmo 37, Campodarsego, PD, tel. +39 049 9219111, certified email address <u>carraro.drivetech@legalmail.it</u>;
- **Driveservice S.r.l.**: via Olmo 37, Campodarsego, PD, tel. +39 049 9219111, certified email address <u>driveservice@legalmail.it</u>;
- **SIAP S.p.A.**: via Monfalcone 4, Maniago, PN, tel. +39 0427 706911, certified email address siap@legalmail.it.

## 2. Purposes, legal basis of the processing of personal data, nature and consequences arising from not providing your data

The Company informs you that for the establishment and execution of the current contractual relationship it has with you, it will come to possess your personal data, including that acquired verbally.

This data is processed for the following purposes:

- (i) formalisation and/or stipulation of contracts;
- (ii) implementation and operational management of the contract, as well as all activities closely related and connected, deriving from and instrumental to the same;
- (iii) tax and administrative-accounting.

The provision of your personal data is necessary in order to allow the Company to fulfil its contractual and/or legal obligations; refraining from providing the same will make it impossible for the Company to carry out these contractual relations.

#### 3. Processing methods and storage period

Your personal data will be processed in written and/or magnetic, electronic or telematic form and with tools that are in any case automated, with logic that is strictly correlated to the indicated purposes and, in any case, so as to ensure the security and confidentiality of the data.

Your personal data will be processed for the entire duration of the contractual relationship established with you and for the execution of legal and administrative-accounting obligations to be borne by the Controller for a maximum period of ten years from the termination of the relationship.



In any case, your personal data will be kept until the expiry of the time limit established for the Controller's exercise of its rights and fulfilment of its obligations underlying the processing carried out.

Please note that your personal data will always be processed by the Controller's personnel, who have been duly instructed and trained by the Controller.

#### 4. Recipients of Personal Data

Personal data may be communicated, in close relation and in accordance with the aims set out above, to the following categories of subjects:

- Credit institutions;
- subjects whose right to access Personal Data is recognised by legislative provisions, including European Community provisions;
- subjects to whom the communication of personal data is necessary or in any case functional to the carrying out of the activities of our Company (for example: persons entrusted to provide legal and contractual advice, insurance companies, credit recovery companies, credit insurance companies, commercial information/customer solvency companies, etc.) on the basis of the legitimate interests of the Controller.

Personal data will not be distributed to third parties except in the cases provided for by law.

The subjects belonging to the categories referred to above operate in total autonomy as independent data controllers; that is, subjects responsible for carrying out activities in the interest of the Controller. The list of responsible subjects can be requested from the following email addresses:

- Carraro S.p.A.: <u>carraro.group@legalmail.it</u>;
- Carraro Drive Tech S.p.A.: <a href="mailto:carraro.drivetech@legalmail.it">carraro.drivetech@legalmail.it</a>;
- **Driveservice S.r.l.**: driveservice@legalmail.it;
- SIAP S.p.A.: siap@legalmail.it.

#### 5. Transmission of personal data within Group companies located within and outside the EU

The Controller may transmit your personal data to Group companies belonging both to European Union and non-European Union countries ('third countries') in order to allow the centralised management of customers'/suppliers' data (given the Controller's legitimate interests to ensure uniformity in its administrative management).

Otherwise, the transfer to third countries:

- i. for which the European Commission, through a suitability decision that is still applicable in light of the new regulation (e.g. Argentina), has considered an adequate level of personal data protection, does not require your express consent;
- ii. for which suitability decisions have not been taken nor have adequate safeguards been provided within the meaning of Article 46 of the Regulation (e.g. India, China, Brazil), will only be allowed with your consent as requested below. Refraining to provide consent will make it impossible for the Controller to carry out the above contractual relationship, given the already explained centralised management of its customers'/suppliers' data.



With specific reference to the risks arising from the cross-border processing of personal data in the third countries referred to in the previous point (ii), the same will be mitigated by Carraro Group internal guidelines and operating instructions on privacy matters, in accordance with the general principles at the core of the Regulation, and by the ban implemented within Group companies for carrying out any erasing, copying, dissemination and/or disclosure of the data without proper authorisation.

#### 6. Rights of the data subject

We inform you that insofar as the processing is concerned, you have the right to obtain the following from the Controller:

Right to access:	confirmation as to whether or not your personal data undergoes
(Art. 15 of the Regulation)	ongoing processing; in this case, you have the right to obtain, <i>inter</i>
	alia, access to your personal data and information regarding the
	scope of the processing, the categories of personal data in question,
	the recipients or categories of recipients to whom the personal data
	has been or will be sent.
Right to rectification:	(i) rectification of incorrect personal data regarding you without
(Art. 16 of the Regulation)	undue delay and (ii) integration of your personal data where it is
	incomplete.
Right to erasure ("right	erasure of personal data regarding you without undue delay (the
to be forgotten"):	Controller is obliged to erase your personal data without undue
(Art. 17 of the Regulation)	delay in the cases provided for in Article 17 of the Regulation).
Right to restriction of	restriction of the processing in the cases referred to in Article 18 of
processing:	the Regulation.
(Art. 18 of the Regulation)	
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Right to data portability:	the right to receive the personal data regarding you which you have
(Art. 20 of the Regulation)	provided to the Controller, in a structured, commonly used and
	machine-readable format and the right to transmit such data to another controller without hindrance from the Controller to which
Diaht to o	the personal data has been provided in Article 20 of the Regulation.
Right to oppose	the right to object, on grounds relating to your particular situation,
processing carried out	to the processing of personal data concerning you at any time,
pursuant to Article 6,	which is based on Article 6, paragraph 1, letters e) or f), including
paragraph 1, letters e) or	profiling based on those provisions.
f):	
(Art. 21 of the Regulation)	

The Data Subject also has the right to **lodge a complaint with the Guarantor for the Protection of Personal Data** if he or she holds that the processing involving him or her infringes a provision of EU Regulation no. 679/2016.

To submit requests relating to the exercise of your rights as listed above, including the further right to withdraw previously-provided consent at any time if expressly requested, as the data subject you can contact the Controller by filling out the *form* posted on the website in the Suppliers section and sending it to the Controller at the relevant certified email address (provided in Art. 4) or by regular post.



The withdrawal of consent to processing does not affect the lawfulness of the processing carried out on the basis of the previously provided consent.

The full text of the articles of EU Regulation no. 679/2016 governing your rights is published on the website of the privacy Guarantor <a href="http://www.garanteprivacy.it/">http://www.garanteprivacy.it/</a>.

### 7. Consent to the data processing

Pursuant to Articles	6, 13	3 and 49 of EU	Regulation no.	679/2016,	as the	Controller	for the:

(i) access to	/ transfer of da	ta to countries	outside of the	European	Union 1	referred	to in the	previous
paragraph 5	(ii) considering	the centralised	d management	of custom	ers'/sup	pliers' d	lata.	

I give my consent  I do not give my consent	
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To request any information and/or clarifications please use the contact details listed in Art. 1.

The Personal Data Processing Controller Carraro S.p.A.

The Personal Data Processing Controller Carraro Drive Tech S.p.A.

The Personal Data Processing Controller Driveservice S.r.l.

The Personal Data Processing Controller SIAP S.p.A.

Surname		
the present counterparty:		