



Società con socio unico soggetta ad attività di direzione e coordinamento di Italgraphica S.r.l.

SEDE AMMINISTRATIVA E STABILIMENTO:
Area Industriale Calaggio
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Cap. Soc. Euro 7.430.223,00 i.v.
R.E.A. NA - 1004730
Iscrizione Registro delle Imprese di Napoli
e Codice Fiscale 02362380640
P.IVA 02362380640

Vat number IT 02362380640

SEDE LEGALE:
Via Del Rione Sirignano, 7
80121 NAPOLI

PRIVACY SUPPLIER' INFORMATION

Naples, 11/04/2023

Dear Supplier,
with this to inform you about the methods of processing the personal data of your employees/ contacts/ afferent pursuant to the European Regulation EU 2016/679 for privacy. In relation to them, we will notify you of any need to process the same data outside the EU. Please note that once you have completed the legal terms for the storage of your personal data that you will provide to us (e.g. for tax or other legal purposes), you may ask us to delete them from our archives.
Therefore, the data will be managed and processed by us as indicated in this statement:

1. Subject matter of processing

The Data Controller processes personal, identifying and non-sensitive data (in particular, name, surname, fiscal code, p. vat, email, telephone number - later, "personal data" or even "data") communicated by you during the contract or during the performance of work activities.

2. Purpose of the processing

Personal data are processed:

A. without express consent (art. 24 lett. a, b, c Privacy Code and art. 6 lett. b, and GDPR), for the following purposes:

- to fulfil commercial, pre-contractual, contractual and fiscal obligations arising from
- relations with you in being;
- to fulfill the contract, the product/ service you sell;
- to comply with the obligations laid down by law, by explicit requests of the Police or
- of the Judiciary, by a regulation, by Community legislation or by an order
- of the Authority;
- to prevent or uncover fraudulent activities or abuse harmful to existing activities;
- to promptly inform your contact persons in case of operational and administrative needs;
- to exercise the rights of the Data Controller, for example the right of defence in court.

B. Only with your specific and distinct consent (art. 23 and 130 Privacy Code and art. 7 GDPR), for the following purposes:

- none

3. Methods of processing

The processing of personal data is carried out through the operations indicated in art. 4 Privacy Code and art. 4 n. 2) GDPR and precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction of data. Personal data are processed both on paper and electronically and/or automated. The Data Controller will process personal data for the time necessary to fulfill the above purposes and in any case for no more than 5 years from the cessation of the activity for the purposes of service and for tax - administrative management.

4. Access to data

The data may be made accessible for the purposes referred to in art. 2.A):

- to employees and collaborators of the Data Controller or Members of the Data Controller, in their capacity as appointed and/or internal data processors and/or system administrators;
- to service companies indispensable to the Data Controller to carry out their administrative activities (for example, for tax consultancy activities, for management control activities, for technical management activities, for the storage of personal data, etc.)



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The ITALIAN INSTITUTE OF PACKAGING





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- to third parties (for example, providers for the management and maintenance of the website, suppliers, credit institutions, professional offices, etc.) who also carry out activities in outsourcing on behalf of the Data Controller, in their capacity as external data processors.

5. Communication of data

Without any express consent (ex art. 24 lett. a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Data Controller may communicate the data of which we will become aware for the purposes referred to in art. 2.A) to Supervision, Judicial Authorities as well as to all other subjects to whom communication is mandatory for law for the fulfilment of the said purposes.

6. Data transfer

The management and storage of personal data will take place on servers located within the European Union, owned by the Data Controller and/ or third parties appointed duly appointed as Data Processors. Currently the servers are located in Italy and in the EU in general. The data will not be transferred outside the European Union. It remains in any case understood that the Holder, if necessary, will move the location of servers in Italy and/ or European Union and/ or non-EU countries.

In this case, the Data Controller ensures that the transfer of data outside the EU will take place in accordance with the applicable legal provisions by stipulating, where necessary, arrangements ensuring an adequate level of protection and/or adopting the standard contractual clauses provided by the European Commission.

7. Nature of data provision and consequences of refusal to reply

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we cannot guarantee the contractual management of the relationship with your company.

8. Rights of the data subject

The persons and staff referred to you, in their capacity as data subjects, have the rights referred to in art. 7 Privacy Code and art. 15 GDPR and precisely the rights of:

- obtaining confirmation of the existence or otherwise of personal data concerning you, even if not yet recorded, and their communication in an intelligible form;
- obtaining the indication: a) of the origin of personal data; b) of the purposes and methods of processing; c) the logic applied in the case of processing carried out with the help of electronic tools; d) the identification details of the owner, the managers and the representatives designated pursuant to 39; art. 5, paragraph 2 Privacy Code and art. 3, paragraph 1, GDPR; e) of the subjects or categories of subjects to whom personal data may be disclosed or who may become aware of it as a designated representative in the territory of the State, managers or agents;
- obtain: a) the updating, rectification or, where it is of interest to you, the integration of data; b) the deletion, the transformation into anonymous form or the blocking of data processed in violation of the law, including those for which storage is not necessary in relation to the purposes for which the data were collected or subsequently processed; c) proof that the operations referred to in paragraphs a) and b) have been brought to the attention of the person concerned, including as regards their content, those to whom the data have been communicated or disseminated, except where such compliance proves impossible or involves the use of means manifestly disproportionate to the protected right;
- oppose, in whole or in part: a) for legitimate reasons to the processing of personal data concerning you for the purposes referred to in art 2B).

Where applicable, you also have the rights referred to in Articles. 16-21 GDPR (Right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object), as well as the right to complain to the Data Protection Authority.





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9. Procedures for exercising rights

You may, through your contact persons, at any time, exercise their rights by sending (alternatively among them):

- a registered letter a.r. to Italpack Cartons s.r.l., Via Rione Siriginano, 7, Naples
- a pec to amministrazione_italpackcartons@pec.it
- an e-mail to privacy@italpack.com

10. Data Controller, Data Processor and Data Processors

The Data Controller is Italpack Cartons s.r.l. The updated list of data processors and those in charge of their processing is kept at the headquarters of the Data Controller.

11. Amendments to this Policy

This policy may change. In this case, you will be promptly sent the most updated version.

The CEO
Italpack Cartons s.r.l.

