

## **Complete Information – Suppliers**

## Who we are and what we do with your personal data?

**TYKELAB S.r.I.,** with its registered office at Via Benedetto Croce n. 19 - 00142 Roma (RM) (hereinafter referred to as the Data Controller), is committed to the confidentiality of your personal data and to ensuring the necessary protection against any event that may put it at risk of violation.

The Data Controller implements policies and practices regarding the collection and use of personal data and the exercise of the rights granted to you by applicable regulations. The Data Controller is careful to update the policies and practices adopted for the protection of personal data whenever necessary, and in any case in the event of regulatory and organizational changes that may affect the processing of your personal data.

The Data Controller has appointed a data protection officer (DPO) whom you can contact if you have questions about the policies and practices adopted.

You can contact the DPO at the following address: privacy@tykelab.it

#### How and why does the Data Controller collect and process your personal data?

The Data Controller collects and/or receives information concerning you, such as:

- o Name, surname, tax code, email, phone number, address, identification code
- Data related to criminal convictions and offenses or relevant security measures (processed exclusively for the management of disputes)

The personal data concerning you will be processed for the following purposes:

### 1)The management of the supply contractual relationship and the consequent regulatory obligations

Purpose	Legal basis
- The management of the contractual relationship in all its phases, from negotiations to its conclusion, regardless of the reason Monitoring and updating the supply conditions and/or services and assignmentsRegistration, invoicing, and accounting management	Execution of contractual and pre-contractual activities  Fulfillment of legal obligations and those arising from the contract and the established relationship, such as, among others, those resulting from:  - D.P.R. n. 633/1972 and s.m.i  - D.P.R. n. 600/1972 and s.m.i  - The Data Controller's ethical code.  Fulfillment of economic-financial and social reporting obligations.

## 2) For communication to third parties and for dissemination.

Purpose	Legal basis
Communication to third parties such as:	Execution of contractual and pre-contractual
<ul> <li>Suppliers possibly involved in</li> </ul>	activities
administrative and accounting	
management.	Fulfillment of obligations arising from the contract
<ul> <li>IT consultants.</li> </ul>	
	Fulfillment of legal obligations, including those
	arising from:
	<ul> <li>D.P.R. n. 633/1972 and s.m.i</li> </ul>
	- D.P.R. No. 600/1972.
	Fulfillment of obligations regarding transparency
	and economic-social reporting



The Data Controller does not transfer your personal data abroad (non-EU countries). Your personal data may be disseminated and disclosed through the Data Controller's relevant websites where lists of suppliers and consultants are published in accordance with the Code of Ethics and the obligations of transparency and economic-social reporting.

Communication and dissemination concern the categories of data whose transmission and/or disclosure are necessary for the execution of the activities and purposes pursued by the Data Controller in managing the established relationship. Such processing does not require the consent of the data subject if it occurs due to legal obligations or to fulfill the obligations arising from the contractual relationship, or in cases where other exclusion criteria apply (specifically the application of the provisions of the Code of Ethics and/or the legitimate interest of the Data Controller), as expressly provided for or mandated by the laws and regulations applicable to the Data Controller, or also through third parties identified as data processors.

## How, where, and for how long are your data stored?

#### How

The processing of data is carried out through paper-based support or IT procedures by specifically authorized internal subjects. These subjects are allowed access to your personal data only to the extent necessary for carrying out the processing activities that concern you.

The Data Controller periodically verifies the tools by which your data are processed and the security measures provided for them, which are subject to continuous updates; they also check, through the authorized processing subjects, that no unnecessary personal data is collected, processed, archived, or stored, or for which the purposes have been exhausted; they ensure that the data are stored with guarantees of integrity and authenticity and that they are used for the purposes of the processing actually carried out.

The Data Controller guarantees that any data found to be excessive or irrelevant after such checks will not be used, except for possible legal retention of the document or record containing them.

#### Where

Data are stored in paper, IT, and electronic archives located within the European Economic Area, and appropriate security measures are ensured.

### **How long**

Your personal data are retained for the time necessary to complete the activities related to the management of the contract you have entered into with the Data Controller and for any resulting legal obligations.

In particular:

identifying information  Duration of the contractual relationsh The following are reserved: - the termination of the contract (for any reason) - the purposes that continue beyond the conclusion of the contract (e.g., accounting maintenance, art. 2220 c.c) - the limitation periods: from five to ten years from the
<ul> <li>the termination of the contract (for any reason)</li> <li>the purposes that continue beyond the conclusion of the contract (e.g., accounting maintenance, art. 2220 c.c)</li> </ul>
conclusion of the relationship and in any case from the moment the rights dependent on it can be exercised (A 2935, 2946, and 2947 c.c)  Additionally, any disputes are subject to an extension of the aforementioned terms, for the time necessary to pursue the related purpose

Once all purposes that justify the retention of your personal data have been exhausted, the Data Controller will ensure their deletion or anonymization.

## What are your rights?

The rights granted to you allow you to always maintain control over your data. Your rights include:

- Access
- Rectification



- Deletion
- Limitation of processing
- Opposition to processing
- Portability

In essence, you can, at any time and free of charge, without any special formalities for your request:

- Obtain confirmation of the processing carried out by the Data Controller.
- Access your personal data and know its origin (when the data has not been obtained directly from you), the purposes and objectives of the processing, the data of the subjects to whom it is communicated, the retention period of your data, or the criteria useful for determining it.
- Update or rectify your personal data to ensure it is always accurate and precise.
- Delete your personal data from databases and/or archives, including backups, in cases where, among
  others, they are no longer necessary for the purposes of processing or if the processing is considered
  unlawful, provided that the conditions prescribed by law are met; and in any case, if the processing is
  not justified by another equally legitimate reason.
- Limit the processing of your personal data in certain circumstances, for example, when you contest its accuracy, for the period necessary for the Data Controller to verify its accuracy. You must be informed in a timely manner when the suspension period has ended or the reason for the limitation of processing has ceased, and therefore the limitation itself has been revoked.
- Obtain your personal data, if its processing is based on a contract and carried out by automated means, in electronic format also for the purpose of transmitting it to another data controller.

The Data Controller must proceed accordingly without delay and, in any case, no later than one month from the receipt of your request. The term may be extended by two months if necessary, taking into account the complexity and number of requests received. In such cases, the Data Controller will inform you within one month of receiving your request and will provide you with the reasons for the extension.

For any further information or to submit your request, write to the address <a href="mailto:comunicazioni@pec.tykelab.it">comunicazioni@pec.tykelab.it</a>

# How and when can you object to the processing of your personal data?

For reasons related to your particular situation, you can object at any time to the processing of your personal data if it is based on legitimate interest by sending your request to <a href="mailto:comunicazioni@pec.tykelab.it">comunicazioni@pec.tykelab.it</a>

You have the right to the deletion of your personal data if there is no overriding legitimate reason for the processing that gave rise to your request.

## Where can you lodge a complaint?

Without prejudice to any other administrative or judicial action, you can lodge a complaint with the Data Protection Authority, unless you reside or work in another EU member state. In that case, or if the violation of data protection legislation occurs in another EU country, the authority competent to receive and handle the complaint will be the regulatory authority established there.

Any updates to this policy will be communicated to you promptly and through appropriate means, and you will also be informed beforehand if your consent is required.