



IMPORTAZIONE MATERIE PRIME S.P.A.

P. IVA 00714460193 - C. F. 00735620155 - Sede legale ed uffici via Triboldi Pietro, 4 - 26015 Soresina - Italia

PRIVACY NOTICE ON THE PROCESSING ACTIVITY OF PERSONAL DATA Art. 13 Regulation (EU) 2016/679 of the European Parliament and of the Council

Importazione Materie Prime S.p.A., with legal head office in [Soresina (Cr)-Via Triboldi Pietro 4-Italy], VAT no. 00714460193 (hereinafter the "**Company**" or the "**Data Controller**"), Data Controller of the processing activity of personal data, provides below the privacy policy pursuant to art. 13 of Regulation (EU) 2016/679 (hereafter "**GDPR**"), to the Data Subjects (hereinafter "**Data Subjects**").

The Company, as the Data Controller, undertakes to protect the confidentiality and the rights of the Data Subject and, according to the principles established by the aforementioned regulations, the processing activity of the data provided will be based on principles of correctness, lawfulness and transparency.

1. PURPOSES OF THE PROCESSING ACTIVITY

The personal data of the Data Subjects will be processed by the Company for the following processing purposes:

- a) fulfill the obligations related to providers management, more specifically, orders arrivals, management contracts, payments, invoices, collection references during pre-contractual selection on company requirements, auditing and certification of financial statements (compulsory / optional), historical data storage;
- b) carry out all administrative, accounting and fiscal activities related to the purposes referred to in letter a) above and comply with the provisions of laws and regulations, national and foreign, or execute an order of the judicial authority or other authorities to whom the Data Controller is subject;
- c) exercise the rights of the Data Controller with particular reference to the right to defense in court.

The processing activity is lawful as it is carried out for the fulfillment of pre-contractual and contractual obligations, compliance with the provisions of laws and regulations and the exercise of the rights of the Data Controller.

2. METHODOLOGY OF THE PROCESSING ACTIVITY

Data processing is carried out electronically and / or on paper, by recording, processing, archiving and transmission of data, even with the support of IT tools.

Tools and media used in carrying out the processing activities are appropriate to ensure the security and confidentiality of data.

In carrying out the processing activities, the Company undertakes to:

- ensure the accuracy and updating of the data processed, and promptly accept any corrections and/or additions requested by the Data Subject;

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Via Triboldi Pietro, 4
26015 Soresina - Italia
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R.E.A. CR 51673
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www.simp-trading.com

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- adopt appropriate security measures to ensure adequate data protection, taking into account the potential impact of the processing on the fundamental rights and freedoms of the Data Subject;
- notify the data subject, within the times and cases provided by law, of any violations of personal data;
- ensure that processing operations comply with the applicable legal provisions.

3. COMMUNICATION AND DISCLOSURE OF INFORMATION

Without prejudice to the communications made in fulfillment of legal obligations, the personal data of the data subject may be known, in addition to the Data Controller, by:

- employees and collaborators of the Data Controller, lawfully authorized by the Data Controller itself;
- administrative / accounting consultants;
- credit institutions;
- authorities in general, administrations, public bodies and organizations, both national and foreign;
- broker and assurance companies;
- audit companies;
- any individual that is recipient of communications contained in rules of law or regulations.

Exclusively for the purposes listed above according to any consent provided by the data subject.

Personal data are not subject to disclosure.

4. TRANSFERS ABROAD

Personal data will be stored and processed within the European Union.

In the event of any processing of personal data outside the European Union, the same will only occur after the adoption of adequate guarantees, as required by the binding legislation.

5. DATA RETENTION POLICY

The Company keeps personal data in its systems in a form that allows identification of Data Subjects according to the following criteria:

- for a period of time not exceeding the achievement of the purposes for which they are processed, unless otherwise required by regulatory or contractual obligations;
- to comply with specific regulatory or contractual obligations;
- if applicable and legitimate, up to any request for cancellation by the Data Subject.

6. RIGHTS OF THE DATA SUBJECT

The Data Subject can assert his rights, recognized by the binding legislation and in particular by the articles from 15 to 22 of the GDPR, such as:

- Right of access: the right to obtain from the Data Controller confirmation that personal data is being processed and, in this case, to obtain access to personal data and to further information on the origin, purpose, categories of data processed, recipients of communication and / or data transfer, etc.

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- Right of rectification: right to obtain from the Data Controller the correction of incorrect personal data without undue delay, as well as the integration of incomplete personal data, also by providing an additional declaration.
- Right to erasure: right to obtain from the Data Controller the cancellation of personal data without unjustified delay in the event that:
 - personal data are no longer necessary with respect to the purposes of the processing;
 - the consent on which the processing activity is based has been revoked and there is no other legal basis for the processing activity;
 - personal data have been processed unlawfully;
 - personal data must be deleted to fulfill a legal obligation.
- Right to restriction of processing: the right to obtain from the Controller the limitation of processing, in cases where the accuracy of personal data is contested (for the period necessary for the Data Controller to verify the accuracy of such personal data), if the processing is unlawful and the data subject has objected to the processing, if the personal data are necessary to the data subject for the assessment, exercise or defense of a right in court, if as a result of opposition to the processing activity the data subject is awaiting verification of the prevalence or otherwise of the legitimate interest of the Data Controller.
- Data portability right: the right to receive personal data in a structured, commonly and automatically readable format, and to transmit such data to another data controller, only for cases where the processing is based on consent or on a contract and only for data processed by electronic means.
- Right to lodge a complaint with a supervisory authority: without prejudice to any other administrative or judicial appeal, the data subject who considers that the processing activity concerning him / her is in violation of the GDPR has the right to lodge a complaint with a supervisory authority.

In order to exercise the rights provided by the GDPR, forward your requests to the Data Controller, [●] at the following contact:

- Email address: info@simp-trading.com
- Phone number: +39 (0)374 341830

Moreover, for any request related to your personal data, you can use the following contacts:

- Email address: info@simp-trading.com
- Phone number: +39 (0)374 341830
- Postal address: Via Triboldi Pietro 4-26015 Soresina (Cr)

