

**PRIVACY POLICY**  
**Articles 13 and 14 of EU REGULATION 2016/679**

**Data Subjects: Suppliers**

**Dear Supplier,**

“**APORA Soc. Coop. Agricola**”, as Data Controller for the processing of your personal data pursuant to and for the purposes of the EU Regulation 2016/679, hereinafter referred to as 'GDPR', hereby informs you that the above-mentioned regulation provides for the protection of the subjects involved in relation to the processing of their personal data. Data processing will be based on the principles of correctness, lawfulness, transparency and protection of your privacy and fundamental rights.

The Data Controller, i.e. “**APORA Soc. Coop. Agricola**”, needs to collect personal data, such as name and surname, telephone or mobile phone number, email address, and tax code to mention a few, in order to achieve the purposes connected to the relationship management.

Your personal data are processed in compliance with the provisions of the aforementioned regulation and the confidentiality obligations provided therein.

**Purposes of the processing:** in particular, your data will be processed for the following purposes related to the fulfilment of legal or contractual obligations, such as:

- Fulfilment of tax and accounting obligations as provided for by the law;
- Management of suppliers;
- Supplier billing history;
- Obligations provided for by the law in force.

The legal basis of the aforementioned processing is consent.

The processing of functional data for the fulfilment of such obligations is necessary to manage the contractual relationship properly. Data provision is mandatory to fulfil the aforementioned purposes. The Data Controller also specifies that if a piece of mandatory information is not communicated or miscommunicated, this may entail that the Data Controller is not able to guarantee the adequate processing of data.

**Data processing mode.** The processing is carried out by using manual and/or IT and online tools to guarantee the security, integrity and confidentiality of data in compliance with physical and logical organizational measures stated by law provisions, in order to minimize the risks of destruction or loss, unauthorized access, unauthorized modification and disclosure of data, in compliance with the processing modes set by articles 6, 32 of the GDPR.

**Recipients:** Some data might be notified or communicated to recipients in order to carry out some activities or provide support for operating and organizing such activities. Recipients may include the following subjects:

**Third parties:** (communication to: a natural or legal person, public authorities, services or entities other than the interested subject, the data controller, the data processor and other entities which are entitled to process data), such as:

- Banks and financial institutions that manage receipts and payments;
- Companies that manage postal services;
- Consultants and freelancers dealing with accounting, tax, legal matters etc., also in the form of professional associations and firms;
- Constitutional bodies or other constitutionally relevant entities;

**Data processors:** (the natural or legal person, public authority, service or entity which processes personal data on behalf of the data controller)

- Companies and other subjects, consultants and freelancers who have been entrusted with the fulfilment of obligations and mandatory tasks related to tax paying, administration, accounting, as well as legal consultants, trainers and professors, etc.
- Entities providing IT, web and other services necessary for the fulfilment of the purposes required for the relationship management.

Your data will be processed internally - within the company structure - only by staff that the Data Controller has authorized. In particular, the members of staff may include:

- Management;
- Financial Department;
- Any other staff member to whom it is necessary to communicate the data in order to fulfil the aforementioned purposes.

**Transfer of data to a third country outside the EU:** Your data will not be transferred to any third country outside the EU.

**Disclosure:** Your personal data will never be disclosed and disseminated to anyone else.

**Data retention period:** Please be advised that, in compliance with the principles of lawfulness, purpose limitation and data minimization as provided for by art. 5 of the GDPR, the retention period of your personal data:

- shall not exceed the period needed to fulfil the purposes for which the said data have been collected and processed, in compliance with the mandatory periods of time set by the law.

**Data Controller:** the Data Controller, pursuant to the law, is APORA Soc. Coop. Agricola, registered office in Via Dismano, 2785 - 47522 Cesena (FC) - Italy | Tel. +39 0547 3771 - Fax +39 0547 377016, e-mail: [privacy@orogel.it](mailto:privacy@orogel.it)

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#### **EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subjects**

1. The data subject shall have the right to obtain confirmation as to whether or not personal data concerning him or her are being processed, even if not yet recorded, and to their communication in intelligible format.
2. The data subject is entitled to obtain an indication regarding:
  - a. the source of personal data;
  - b. processing purposes and procedures;
  - c. the logic involved in the case of processing by electronic means;
  - d. identifiers of the data controller, processors and designated representatives pursuant to article 5 paragraph 2;
  - e. the entities or groups of entities to which any of the personal data in question may be disclosed or which may be made aware of them as designated representative within the territory of the State, as processors or officers.
3. The data subject is entitled to apply for:
  - a. updating, rectification or – if applicable – integration of the data;
  - b. erasure, transformation in anonymous form or blocking of data processed in violation of the law, including those for which storage is not necessary in relation to the purposes for which they have been collected or subsequently processed;
  - c. documentation that the operations referred to under a) and b) have been notified, also as regards their content, to those to whom these data have been communicated or divulged, except for the case where this is impossible or involves the use of means which are manifestly disproportionate compared to the right being safeguarded;
  - d. data portability.
4. The data subject has the right to object, totally or in part:
  - a. for legitimate reasons to the processing of personal data concerning him or her, even if they are relevant for the purpose of collection;
  - b. to the processing of personal data concerning him or her in order to send advertising or direct sales materials or for market research or commercial communication purposes.
5. Data subjects also have the right to lodge a complaint with the Supervisory Authority following the required procedures, provided that the requirements are met. For any further information, and in order to claim the rights assigned to you by the European Regulation, you may write to the data controller.