

Privacy policy on contractual relations

This privacy policy supplements the general data in the document "general data applicable to all privacy policy".

Purposes and Legal Bases for Processing and Criteria for Determining the of Data Retention period

The purposes of the processing are related to the presentation of the Controller's Services, business proposals (made or received), negotiation and conclusion of agreements.



The legal bases for this processing are:

- need for the exercise of pre-contractual and contractual measures
- consent (where necessary will be requested)
- legitimate interest of the data controller in a smoother organisation of its work.

Criteria identified for the data retention period linked both to compliance with current tax and administrative regulations as well as to keeping a profitable network of business contacts up to date and constant.



▼ Source of origin of personal data

Data not collected from the data subject come from publicly accessible sources such as company websites and are used in accordance with the principle of purpose.

Social-media research may be conducted on certain professional figures to better identify their professional role.

Certain Data Subjects/Referents may be introduced to the Controller through partners or collaborators.



Contractual reference

- The Parties undertake that the personal data provided to each other shall be processed in compliance with the European Data Protection Regulation 2016/679 ("GDPR"), Legislative Decree No. 196/2003 of Italian Law ("Privacy Code") and subsequent amendments and additions, as well as within the limits set out below.
 - Among the possible actions to be taken, should the type of relationship between the Parties concretise the case envisaged by Article 28 GDPR, is the signing of a Data Controller Data Processor Agreement. The Parties undertake as of now to fulfil this possible obligation in an annex "DPA by article. 28 GDPR Controller-Processor Agreement".
- The Parties mutually acknowledge, in their capacity as Data Controllers, that such personal data shall be processed for the purpose of entering into and executing the contractual relationship, i.e. for purposes strictly connected with and instrumental to the performance of any pre-contractual activities, the management of the contractual relationship (e.g. administrative and accounting activities), the fulfilment of contractual obligations as well as to comply with legal obligations, and shall be retained for the needs inherent to the performance of the Contract and in any case for the time necessary to fulfil the legal or regulatory obligations of the Data Controller.
- Data shall be processed only by the Parties, by subjects specifically authorised by them or by other third parties which the Parties themselves make use of, specifically appointed as External Data Processors, as well as by autonomous Data Controllers with an adequate legal basis (e.g. by the Authorities in case of request). Personal data shall not be subject to dissemination in the sense of publication unless the processing is provided for by consent of the Data Subject, by the nature of the Contract or by legal obligations to which the Data Controller is subject.
- This is without prejudice to the right of the Parties to possibly transfer the data outside the territory of the European Union, to those states that ensure the same level of security and guarantee in data processing as well as full compliance with the provisions of the GDPR.



▼ Version and date

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