



## Full Privacy Notice for Suppliers

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

**Avr Tech S.r.l.**, with registered office at Via Francesco Tensi, 116 (hereinafter also referred to as the **Data Controller**), as the controller of personal data, cares about the confidentiality of your personal data and is committed to protecting it from any event that may put it at risk of breach.

The Controller implements policies and practices regarding the collection and use of personal data and ensures the exercise of your rights as granted by applicable legislation. The Controller reviews and updates its policies and practices for personal data protection whenever necessary, especially in the event of regulatory or organizational changes that may affect the processing of your personal data.

The Controller has appointed a **Data Protection Officer (DPO)** whom you can contact for any questions regarding the adopted policies and practices.

You may contact the DPO at the following address and contact details:

**Colin & Partners S.r.l. a Socio Unico – Alessandro Cecchetti**

Via Privata Maria Teresa, 7

20123 – Milan, Italy

Phone: +39 02 87198390

Email: [privacy@avrgroup.it](mailto:privacy@avrgroup.it)

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

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

- first name, last name
- VAT number and tax code
- place and date of birth
- physical and electronic address
- landline and/or mobile phone number
- bank account number
- IT data (access logs, IP address, etc.) derived from activities carried out for the Controller (e.g., for the management of platforms, applications and/or hardware and software infrastructures owned by the Controller, including maintenance activities), and/or from the use of platforms managed by the Controller to which suppliers are granted access
- information related to your professional and/or business activities

Your personal data will be processed for the following purposes:

**AVR Tech S.r.l.**

**Registered Office**

**Registered Office, Management and Administration**

Via Francesco Tensi, 116

00133 Roma

Tel. +39 06.20944

Fax +39 06.20944049

[info@avrgroup.it](mailto:info@avrgroup.it)

pec: [avrtech@arubapec.it](mailto:avrtech@arubapec.it)

[www.avrgroup.it](http://www.avrgroup.it)

Share Capital: €10,000.00 fully paid – VAT No., Tax Code and Rome Companies Register No. 15789971007 – Economic and Administrative Index (R.E.A.) No. 1614201

Company subject to the management and coordination of AVR S.p.A.

**Roma - Firenze – Empoli**



## 1) Management of the contractual supply relationship and related legal obligations

| Purpose  | Legal Basis  |
|--|--|
| Management of the contractual relationship in all its phases, from negotiations to conclusion, regardless of the cause | Performance of contractual and pre-contractual activities  |
| Monitoring and updating supply and/or service conditions and assignments   | Fulfillment of legal obligations and obligations arising from the contract and established relationship, including but not limited to those under:                                   |
| registration, invoicing, and maintenance of accounting records   | <ul style="list-style-type: none"> <li>• Presidential Decree no. 633/1972 and subsequent amendments</li> <li>• Presidential Decree no. 600/1972 and subsequent amendments</li> </ul> |
|  | Code of Ethics of the Controller<br>Compliance with economic, financial, and social reporting obligations  |

**Your personal data may also be collected from third parties, including but not limited to:**

- other data controllers, such as the parent company **AVR S.p.A.**;
- providers of IT and digital infrastructure services;

**In addition, your personal data may be obtained through the consultation of:**

- registers or databases maintained by public authorities, entities considered equivalent, or entities operating under the supervision of public authorities, pursuant to specific national legislation.

## 2) For the communication of personal data to third parties and for its potential dissemination, where applicable

| Purpose   | Legal Basis  |
|---|--|
| Disclosure to third parties such as:<br>the parent company AVR S.p.A., for administrative and accounting purposes;<br>public authorities, for the fulfilment of legal obligations;<br>external consultants for accounting and tax matters;<br>banking institutions for the management of payments;<br>legal consultants for the management of disputes and contracts;<br>IT service providers for support and maintenance of hardware and software systems. | Performance of contractual and pre-contractual activities. Fulfilment of obligations arising from the contract.<br>Compliance with legal obligations, including those arising from: <ul style="list-style-type: none"> <li>• Presidential Decree No. 633/1972, as amended;</li> <li>• Presidential Decree No. 600/1972;</li> </ul> Fulfilment of obligations related to transparency and economic-social reporting requirements. |

**The Controller does not transfer your personal data outside the EU (non-EU countries).**

Your personal data may be disclosed and made publicly available through the Controller's official websites, where lists of suppliers and consultants are published in compliance with the Code of Ethics and obligations related to transparency and economic-social reporting.

Disclosure and dissemination involve categories of data whose transmission and/or publication is necessary for carrying out the activities and achieving the purposes pursued by the Controller in managing the established relationship.

Such processing does not require the data subject's consent where it occurs:

- in compliance with legal obligations;
- for the performance of obligations arising from the contractual relationship;

- or where other exceptions apply (specifically, the application of provisions under the Code of Ethics and/or the Controller's legitimate interest), as expressly provided for or arising from applicable laws and regulations adopted by the Controller, including through third parties appointed as data processors.

### 3) for IT security activities

| Finalità  | Base giuridica   |
|---|--|
| controllo e monitoraggio dei servizi esposti in rete e sulle piattaforme di pertinenza del <b>Titolare</b> e messi a tua disposizione anche in ragione delle attività svolte per conto del <b>Titolare</b> (accesso area riservata, siti web, casella di posta elettronica, amministrazione dei sistemi in uso, etc.) | Svolgimento attività dipendenti dal rapporto instaurato<br><br>Adempimento di obblighi di legge (rilevazione e notificazione di eventi di data breach) |
| implementazione procedure di rilevazione e notificazione delle violazioni di dati personali (data breach)   | Interesse legittimo  |

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

#### How

Data is processed using paper-based and/or electronic systems by internal personnel specifically authorized for this purpose. These individuals are granted access to your personal data only to the extent strictly necessary to perform processing activities related to you.

The Controller periodically reviews the tools used to process your data and the related security measures, which are regularly updated. The Controller also ensures—either directly or through authorized personnel—that no personal data is collected, processed, stored, or retained unnecessarily or for purposes that are no longer valid. The Controller ensures that all data is stored with guarantees of integrity, authenticity, and is used solely for the purposes of the processing actually carried out.

The Controller guarantees that any data found to be excessive or not relevant, including as a result of such reviews, will not be used, except for the lawful retention of the document or record in which such data is contained.

#### Where

Data is stored in paper, digital, and electronic archives located within the European Economic Area (EEA), with appropriate security measures in place.

#### How long

Your personal data is retained for the duration necessary to carry out the activities related to the management of the contract entered into with the Controller and to fulfill any related legal obligations.

In particular:

|  |  |
|--|--|
| Identifying data                                       | Duration of the contractual relationship<br>Without prejudice to the following:  |
| Accounting/financial data                              | the termination of the contract (for any reason);  |
| Data related to professional and commercial activities | purposes that continue beyond the end of the contract (e.g., accounting record retention, pursuant to Article 2220 of the Italian Civil Code);<br><br>statutory limitation periods: from five to ten years following the conclusion of the relationship and, in any case, from the moment when the rights arising from it may be exercised (Articles 2935, 2946, and 2947 of the Italian Civil Code);<br><br>Furthermore, in the event of legal disputes, the aforementioned time limits may be extended for the period necessary to achieve the |

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|--|---|
|  | related purposes.   |
| IT data (system and network access logs and/or IP addresses) | The retention period depends on the presumed and/or detected risk and on any resulting detrimental consequences, without prejudice to measures aimed at anonymizing the data or limiting its processing. In any case, the data must be retained (starting from the moment the risk event or data breach is discovered or identified) for the period necessary to notify the competent supervisory authority of the detected breach, in accordance with the procedures implemented by the Controller, and in any case, to take the necessary corrective actions. |

Once the purposes that justify the retention of your personal data have been exhausted, the Controller will ensure that such data is deleted or anonymized.

### **What are your rights?**

You have a series of rights that allow you to maintain full control over your personal data. These rights include:

- Access;
- Rectification;
- Erasure;
- Restriction of processing;
- Objection to processing;
- Data portability.

In essence, at any time and free of charge, without specific formalities, you may:

- Obtain confirmation as to whether or not personal data concerning you is being processed by the Controller;
- Access your personal data and learn its origin (when not collected directly from you), the purposes and methods of processing, the data of third parties to whom it is disclosed, and the retention period or the criteria used to determine it;
- Update or rectify your personal data to ensure it is always accurate and up-to-date;
- Request the erasure of your personal data from databases and/or backups when, among other reasons, it is no longer necessary for the purposes for which it was collected or when processing is deemed unlawful, provided that the legal conditions are met; in any case, the request may be granted when there is no other lawful basis for the processing;
- Restrict the processing of your personal data under certain conditions, for example, if you contest the accuracy of the data, for the period necessary for the Controller to verify its accuracy. You will also be informed, within a reasonable timeframe, when the suspension has ended or the reason for the restriction has ceased to exist, and thus when the restriction is lifted;
- Obtain your personal data in electronic format, especially if the processing is based on a contract and carried out by automated means, including for the purpose of transmitting it to another data controller.

The Controller must act on your request without undue delay and, in any case, within one month of receipt. This period may be extended by two additional months where necessary, taking into account the complexity and number of requests. In such cases, the Controller will inform you within one month of receipt of the request, providing the reasons for the delay.

For further information or to submit a request, you can contact: [privacy@avrgroup.it](mailto:privacy@avrgroup.it)

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



For reasons related to your particular situation, you may object at any time to the processing of your personal data if it is based on the Controller's legitimate interest, by sending your request to [privacy@avrgroup.it](mailto:privacy@avrgroup.it). You have the right to have your personal data erased if there is no overriding legitimate reason justifying its continued processing.

### **To whom can you lodge a complaint?**

Without prejudice to any other administrative or judicial remedy, you may file a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), unless you reside or work in another EU Member State. In such cases—or if the data protection violation occurs in another EU country—the competent authority to receive and handle the complaint shall be that of the relevant Member State.

Any updates to this notice will be promptly communicated to you by appropriate means. You will also be informed prior to any changes, in good time to provide your consent if required.

