assotech	**PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA (CUSTOMERS & SUPPLIERS)** pursuant to Articles 13 and 14 of the General Data Protection Regulation (EU) 2016/679 ("GDPR")	Rev. 01 26/02/2026

This document is intended to explain the methods and purposes of the processing of your personal data carried out in the context of the customer or supplier relationship with ASSOTECH S.R.L., and to provide you with all the information required by applicable law, including Your rights and how to exercise them.
The processing of Your personal data will be carried out in compliance with the provisions of EU Regulation 2016/679 (GDPR), Legislative Decree no. 196 of 30 June 2003, as amended by Legislative Decree 101/2018 (Privacy Code), and the measures of the Italian Data Protection Authority. The processing will be based on the principles of lawfulness, fairness, transparency, data minimisation and accountability (Articles 5 and 24 GDPR) and in full respect of Your confidentiality and Your rights.

1. **Data Controller**
   ASSOTECH S.R.L.
   Via Nazionale 55/11 40065 Pianoro (BO)
   P.IVA : 00523661205
   Mail: assotech@assotech.com
   PEC: assotech@pec.assotech.com

2. **Purposes of processing and categories of data processed**
   The processing of Your personal data is aimed at managing the contractual or pre-contractual relationship with ASSOTECH S.R.L., as well as fulfilling the related legal, tax, administrative and accounting obligations.
   For this purpose, the Controller may process common personal data, including:
   - identification data: first name, last name, place and date of birth;
   - contact data: address, telephone, email;
   - tax and administrative data: tax code, VAT number, invoicing data, registered and operational office addresses, tax and contribution information, data relating to orders, deliveries and commercial documents;
   - banking and payment data: IBAN, details for collection and payment transactions;
   - data relating to representation and contact persons: qualification, role, signing powers and information necessary for the operational management of the relationship.

   Where the relationship is with legal entities, this notice concerns exclusively the personal data of their representatives, contact persons, appointees or points of contact.
   In addition to the above, the data may be processed to pursue further legitimate interests of the Controller, including, by way of example:
   - the establishment, exercise or defence of a legal claim in judicial, administrative, arbitration or conciliation proceedings;
   - the security of access to the premises and the protection of company assets;
   - the fulfilment of obligations under civil, tax and accounting legislation.

3. **Legal basis**
   The processing of Your personal data for the purposes indicated in section 2 does not require Your consent, as it is necessary for the performance of pre-contractual measures or for the management of the contractual relationship with ASSOTECH S.R.L., pursuant to Article 6(1)(b) GDPR.
   The processing is also necessary to enable the Controller to comply with the legal and tax obligations provided for by current legislation, in accordance with Article 6(1)(c) GDPR.
   Finally, the processing may be carried out to pursue the Controller's legitimate interest in properly and effectively conducting its commercial and business activities, pursuant to Article 6(1)(f) GDPR.

4. **Provision of data**
   The provision of Personal Data is necessary for the negotiation, establishment, management and performance of the contractual relationship with the Controller. In particular, the processing of data is indispensable for fulfilling contractual and legal obligations and for ensuring the effective performance of the agreed services. Failure to provide the requested data may make it impossible for the Controller to properly perform the contract or to fulfil the obligations set out by law or by the contract itself.

5. **Processing methods**
   The processing of Your personal data will be carried out in compliance with the principles of lawfulness, fairness and transparency and may take place using both paper and IT and electronic tools. Processing operations will be carried out in ways strictly related to the stated purposes and in compliance with the technical and organisational measures appropriate to ensure the security, integrity and confidentiality of the data, in accordance with Article 32 GDPR.
   No automated decision-making, including profiling, is envisaged pursuant to Article 22 GDPR.

6. Retention period

Personal Data will be retained for the time strictly necessary to achieve the purposes for which they were collected and processed, as described in section 2 of this document, and in any case for the entire duration of the contractual or pre-contractual relationship with the Company. Subsequently, the data may be retained for a further period solely where required by legal obligations, administrative, tax or accounting needs, or for the protection of the Controller's rights in legal proceedings. After such periods have elapsed, the data will be permanently deleted or anonymised.

7. Recipients of data

Personal data will be accessible exclusively to the Controller's employees and collaborators, duly appointed and instructed pursuant to Articles 29 and 32(4) of Regulation (EU) 2016/679, who act under the direct authority of the Controller and are bound by confidentiality obligations.

The data may also be processed by external parties providing services to the Controller, appointed as "Data Processors" pursuant to Article 28 GDPR. These parties will operate exclusively on the documented instructions of the Controller and for purposes strictly connected to the management of the contractual or commercial relationship, adopting appropriate technical and organisational measures to ensure the security of personal data. These include, by way of example: IT, cloud and management software service providers; employment, tax and legal consultants; training companies and accredited training bodies; banks and insurance companies; consultants in the fields of occupational safety and business management systems (e.g. quality, environment, safety, privacy).

Personal data may also be communicated to parties acting as independent Data Controllers, only in the cases and for the purposes provided for by law. By way of example, these include: public bodies and competent authorities (INPS, INAIL, Revenue Agency, ASL, Labour Inspectorates, Judicial Authorities). The updated list of Data Processors appointed by the Controller is available at the company's registered office and is provided upon request of the data subject.

Personal data will not be disseminated.

8. Transfer of data to a third country or international organisations

Personal data may be processed using IT tools and digital platforms used by the company to manage operational and organisational activities.

Some IT service providers and digital platforms used by the Controller may have their registered office or servers located in countries outside the European Economic Area. In such cases, the transfer of data takes place in compliance with the safeguards provided for by Regulation (EU) 2016/679, such as adequacy decisions of the European Commission or the adoption of Standard Contractual Clauses (SCCs).

9. Rights of the data subject

As a data subject, You have the right to:

- Access Your personal data: obtain confirmation as to whether or not personal data concerning You is being processed and, if so, access its content.
- Obtain rectification: request the correction of inaccurate personal data or the completion of incomplete data.
- Request erasure of data (right to be forgotten): when there are no longer legitimate grounds for the processing, You may request the erasure of Your data.
- Request restriction of processing: obtain the restriction of processing in certain circumstances, such as in the case of contested data.
- Object to processing, where legitimate conditions exist, pursuant to Article 21 GDPR.
- Withdraw consent at any time: if the processing is based on Your consent, You have the right to withdraw it, without affecting the lawfulness of processing based on consent given before withdrawal.
- Request portability of personal data processed by automated means and on a contractual basis, pursuant to Article 20 GDPR.
- Lodge a complaint with the Italian Data Protection Authority: if You believe that the processing of Your personal data violates the GDPR, You have the right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

To exercise Your rights, You may send a PEC to the address assotech@pec.assotech.com, or write to the email address: assotech@assotech.com .

ASSOTECH S.R.L. undertakes to respond without undue delay and in any case within 30 days, as provided by applicable law. The Controller reserves the right to update this notice, by publishing the updated version or by informing data subjects by the means deemed most appropriate.