



SUPPLIER INFORMATION
pursuant to Article 13 of the General Data Protection Regulation (EU) 2016/679
(version July 2023)

DATA CONTROLLER

The Data Controller is San Giorgio del Porto S.p.A. (P.IVA 003418160102) with registered office in Genoa, 16128, Calata Boccardo 8, tel. 010.251561, pec sangiorgiodelporto@legalmail.it (hereinafter SGDP), whom you may contact through the address indicated or through the email address privacy@sgdp.it. The Company is part of the Genova Industrie Navali S.p.A. Group, Via dei Pescatori Molo Cagni, 16128 Genova, Italy, which has identified a Data Protection Officer who can be contacted at dpo.ginholding@privacyinchiaro.it.

ORIGIN OF YOUR DATA AND CATEGORIES OF PROCESSED DATA

The data being processed are those you provide in the relationship of trust established in your capacity as a supplier, for the activities of the principal. In addition to personal contact data (first name, surname, telephone, company reference e-mail), tax data, payment data, judicial data and economic data may be handled. Furthermore, in the event of work being entrusted to your employees at the company's premises or at other locations, you will be obliged to disclose the data of the employees involved as required by law. It will be in your specific interest to give correct information to your employees involved in the performance of services at this company. We also process images taken by the video surveillance system (see specific information notice).

PURPOSE AND LEGAL BASIS OF PROCESSING

SGDP will process the data communicated by you for the purposes of establishing, managing and terminating the employment relationship. In particular:

- To provide services to end customers with your support (GDPR, art. 6, paragraph 1, letter b), and for the related sending of information, requests for quotes or the provision of the requested service;
- For legal obligations to which the data controller is subject (GDPR, art. 6, para. 1, lett. c) By way of example only, for the fulfilment of accounting and tax obligations incumbent on SGDP;
- For the pursuit of the legitimate interest of the owner (GDPR, Art. 6, para. 1, lett. f). By way of example only:
 - Scheduling of activities;
 - Combating fraud;
 - Responding to specific requests from competent Authorities;
 - Protection of the company's rights in judicial and extrajudicial proceedings;
 - Protection of company assets with access controls;
 - Protection from or handling of incidents in the company area.

SGDP does not carry out any automated processing of your personal data for the purpose of making decisions concerning you.

COMPULSORY COMMUNICATION OF DATA

Failure, partial or incorrect provision of the requested data, necessary for the pursuit of the purposes illustrated in the relevant section of this information notice, does not make it possible to complete the contractual relationship between the Company and your employer or with you.

PLACE OF DATA PROCESSING AND PROCESSING METHODS

Your data is processed in the territory of the European Union or in countries permitted by the GDPR. For contractual requirements it may be transferred to third countries outside the European Union, but in that case it will be appropriately minimised and appropriate measures will be taken to ensure its protection. All operations - collection, processing, consultation, printing, storage, modification, updating - may be carried out on paper or by means of electronic tools.

COMMUNICATION OF YOUR DATA TO THIRD PARTIES

Your data may be processed on paper and electronically and will not be disclosed in any way, but may be transmitted to the competent bodies for administrative or institutional purposes, as required by current legislation. More specifically, the data may be communicated to recipients belonging to the following categories:

- Shareholders and other group companies
- Information system management companies
- Consultants, freelancers, credit institutions and banks, lawyers, etc;
- Customers to guarantee the interface with them and provide the best possible service;
- External parties delegated to manage and maintain the company's IT systems, including on the cloud, and technical equipment;
- External tax consultants;
- Authorities and public bodies competent by law;
- Banking and insurance institutions;
- Judicial and/or public security authorities in cases expressly provided for by law;
- Other suppliers and subcontractors where necessary for the performance of the service;
- companies that provide access control services in the spaces used by the company.

Only the minimum personal data necessary to perform the part of the service for which they are responsible will be communicated to these subjects. These subjects, where applicable, will be appointed as Data Processors pursuant to Article 28 GDPR. The list of Data Processors is available upon simple request.

The data may be processed by authorised SGDP personnel who are specially trained and sensitised on the subject, on respect for the confidentiality of the data and on the protection of the dignity of all those concerned.

SGDP does not profile the data of its suppliers.

DATA RETENTION PERIOD

The data collected for purposes a) and b) of the preceding point shall be retained for the period provided for by law and no longer than 10 years from the end of the fiscal year in which the last contact was made, without prejudice to any other legal obligations.

In case of protection of the holder's rights, and for the purposes of point c), the data will be processed for the time necessary for the statute of limitations to accrue.

YOUR RIGHTS

You have the right to request and receive, at any time, information regarding your personal data processed by SGDP or to request its rectification. Where applicable, you have the right to request their deletion, to restrict their processing and to receive, in a structured, commonly used and machine-readable format, personal data concerning you. You may address any request regarding your rights directly to SGDP at privacy@sgdp.it.

You also have the right to object to the processing of your data, in accordance with the provisions of Article 21 GDPR, or to lodge a complaint with the competent Supervisory Authority in accordance with the provisions of Article 77 GDPR.

UPDATES

SGDP reserves the right to update this policy, with the latest version made available by the company remaining valid.