**Dear Suppliers and Customers,**

DAINA Srl, as Data Controller, protects the confidentiality of your personal data and guarantees the necessary protection from any event that could put the data at risk of violation.

To this end, the Data Controller implements policies and practices regarding the collection and use of personal data and the exercise of the rights granted to you by the applicable legislation. The Data Controller takes care to update the policies and practices adopted for the protection of personal data whenever this becomes necessary and, in any case, in the event of regulatory and organizational changes that may affect the processing of your personal data.

***Purpose and Legal Basis of the Processing***

The processing of personal data concerning you will be implemented in order to allow for the activities related to the establishment and management of the contractual relationship among the company, the supplier and/or the Customer to be carried out based on the following legal assumptions:

* for the implementation of a contract which the interested party is a part of (article 6.1.b EU Regulation 2016/679);
* the processing is necessary to fulfill a legal obligation to which the Data Controller is subject based on the regulations of the laws of the State and the law of the European Union;
* consent of the interested party for the sending of information relating to the products supplied by the Company

The Data Controller collects and/or receives information about you, such as personal data - tax code, telematic address, telephone number, and bank data.

This information is necessary for:

* management of the procedure for the selection and qualification of the supplier;
* assessing the technical and economic suitability of the offer and of the company and verifying the existence on the part of the latter of all the requirements imposed by the applicable legislation for the purposes of a possible assignment of the supply;
* for the management of offers for the supply of products and services
* managing the activities of providing products and services
* for the management of logistics and invoicing
* allowing the correct regulatory, technical and economic management of the contractual relationship that may be established in the event of assignment or acquisition of the contract and the fulfillment of the obligations established by the legislation in force;
* bookkeeping

Personal data is also collected by third parties such as, for example:

* other data controllers;
* lists and registers kept by public authorities or under their authority or similar bodies based on specific national and/or international legislation;
* private and public bodies operating in the sector within the national and international territory with whom the data controller has established relationships for the sharing of information;

***Principles and Rules for Processing***

The processing of information will be based on the principles of fairness, lawfulness and transparency and the protection of your privacy and rights. Furthermore, the data that will be collected are those that are essential to managing the activities described in compliance with the principle of minimization foreseen by EU Regulation 2016/679.

**What happens if you do not provide your data**

If you do not provide your personal data, DAINA Srl will not be able to carry out the processing related to management of the following:

* management of the supply contract;
* the obligations, including the legal ones, that derive from the established relationship.

The Data Controller intends to carry out some processing according to certain legitimate interests which do not compromise your right to privacy, such as those which:

* make it possible to prevent fraud, including contractual fraud;
* allow the prevention of IT incidents and the notification to the supervisory authority or the communication to users, if necessary, of the violation of personal data;
* allow communication to third parties/recipients for activities related to contract management.

**How and for how long are your data stored?**

The processing of data concerning you takes place through both electronic and manual means and tools made available to subjects acting under the authority of the Data Controller, who are authorized and trained for this purpose. The paper and especially electronic archives where your data are saved and stored are protected by effective and adequate security measures to counteract the risks of violation considered by the Data Controller. The Data Controller provides for periodic and constant verification of the measures adopted, to guarantee the confidentiality of personal data, processed, filed and saved through them.

Personal data is kept for the time necessary to complete the activities related to the management of the contract with the Data Controller and for the fulfillment of the obligations, including legal ones, that ensue.

How long

The personal data processed by the Data Controller are kept for the time necessary to complete the activities related to the management of the contract with the Data Controller and for up to ten years following its conclusion.

**Who has access to your data**

Your data may be made accessible for the purposes previously described:

* to DAINA Srl employees and collaborators who carry out activities functionally linked to the purposes permitted to the company;
* to third-party companies or other subjects (for example, credit institutions, professional firms, consultants, etc.) who carry out activities on behalf of the Data Controller, as external persons in charge of the processing.
* Data in digital format may also be processed by external companies that provide assistance services relating to the use of software applications, the management and provision of IT services.

The detailed list of subjects who carry out services on behalf of DAINA Srl and who process the company's databases is available at the secretary’s office and on the institutional website in the Privacy area

**Communication to third parties and recipients and circulation of data**

Your data will be communicated to third parties/recipients for their independent purposes

* Public bodies and institutions if it is necessary for the fulfillment of obligations dependent on the contract and the legal provisions that govern it (e.g. for the defense of your rights, for reporting to the supervisory authorities, etc.);
* *to credit institutions*
* *to couriers or postal service companies*
* to the financial administration, and to the public supervisory and control bodies towards whom the Data Controller must fulfill specific obligations deriving from the peculiarity of the activity carried out;

Your personal data are not disclosed by DAINA Srl, i.e. made accessible to a plurality of indeterminate subjects, without prejudice to legal obligations.

The data are stored in paper, computer and electronic archives located within the European Economic Area, and adequate security measures are guaranteed.

***Rights of the interested party (foreseen by articles 15 – 21 of EU REG. 2016/679)***

The European Regulation grants the interested party the exercise of specific rights

* the right to ask the Data Controller to access his/her personal data, Art. 15 Reg. 2016/679/EU;
* the right to ask the Data Controller to be able to rectify his/her personal data, where this does not conflict with current legislation on data retention, Art. 16 Reg. 2016/679/EU;
* the right to ask the Data Controller to erase his/her personal data, where this does not conflict with current legislation on data retention, Art. 17 Reg. 2016/679/EU;
* the right to ask the Data Controller to limit the processing of his/her personal data, Art. 18 Reg. 2016/679/EU;
* the right to object to processing, Art. 21 Reg. 2016/679/EU
* the right to revoke consent at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation, Art. 7. 3 Regulation 2016/679/EU;

**Right to lodge a complaint (Art. 13.2.d Regulation 2016/679/EU)**

The interested party has the right to lodge a complaint with the Guarantor Authority for the protection of personal data to exercise rights regarding the processing of his/her personal data.

He/She may take advantage of the above rights through a written request sent to the Data Controller of his/her personal data.

**Data Controller**

The Data Controller is DAINA Srl

with headquarters in Via Borgosatollo, 70, 25010 - Montirone - BS

email: amministrazione@dainasrl.com

Tel. (+39) 030 267143

fax (+39) 030 267641

Updated to June 30th, 2023 in Montirone