

Privacy information about the personal data of vendors
(collected from data subjects pursuant to art. 13 GDPR - Regulation (EU)
2016/679)

Consistent with the principle of transparency, the following information is provided pursuant to art. 13 GDPR (Regulation (EU) 2016/679) in order to ensure that users are aware of how their data is processed and the characteristics of such processing:

A. Identity and contact details

Pursuant to art. 4 of Regulation (EU) 2016/679, the Controller is Gruppo Florence S.r.l., with registered office at via Manzoni 43 – 20121 – Milan.

All requests must be made in writing to the Controller at the following e-mail address:
privacy@gruppoflorence.com

B. Purposes of processing, lawfulness and legitimate interest

Gruppo Florence S.r.l. processes personal data for the following purposes:

1) to satisfy pre-contractual requirements (e.g. prepare offers or orders, check solvency);
2) to satisfy contractual commitments (supply of goods and/or services, including the management of delivery obligations, logistics and related transportation) and legal requirements (e.g. accounting records, tax formalities, administration and accounting processes);

3) to manage vendors with regard to aspects not covered by points 1-2: internal organization of activities directly associated with the inbound and outbound supply of products and/or services, such as, without limitation, the management of credit limits and the control of risks (fraud, insolvency, etc.), the management of disputes and the assignment of receivables, the management of financial and insurance services, the management of electronic payment instruments, the management of telephone contact lists, the processing of statistics);

The lawfulness of processing is found in arts. 1337 and 1338 of the Italian Civil Code, as well as in the (subsequent, if applicable) contracts signed between the Controller and the recipients of this privacy information (data subjects), the regulations that govern the various accounting, tax and regulatory requirements, or the instructions received from competent authorities.

Processing is necessary in pursuit of the legitimate interest of the Controller to meet its pre-contractual obligations arising pursuant to current regulations (arts. 1337 and 1338 of the Italian Civil Code) and the contractual commitments agreed between the parties; accordingly, such processing does not require explicit consent [art. 6, para. 1.b), GDPR].

C. Recipients and any categories of recipient of the personal data / Access to the personal data

Personal data is processed at the facilities of the Controller by authorized persons (employees and collaborators) appointed to process it for the above purposes under the supervision of the Controller.

Personal data may also be communicated to external parties (for outsourced activities) with which the Controller has specific agreements, conventions or understandings, unless those parties are defined as independent controllers under the relevant current regulations.

Personal data may be communicated to the following categories of recipient:

- I. administrative, tax, accounting and payroll consultancies (lawyers, public accountants, auditors, members of supervisory bodies, etc.);
- II. freight forwarders, carriers and couriers (solely with regard to delivery data);
- III. providers of the management software used by Gruppo Florence S.r.l.;
- IV. internal personnel authorized to process personal data after receiving adequate operational instructions;
- V. external processors specifically designated for that purpose;
- VI. public administrations for all compliance activities required by law;
- VII. judicial authorities;
- VIII. external consulting firms;
- IX. insurance companies for the coverage of risks;
- X. providers of IT maintenance and/or support services in relation to the IT systems, databases and services of the Controller;
- XI. banks and credit institutions, for the management of payments;
- XII. credit collection companies, factoring companies, leasing companies, companies specialized in the insurance or bulk purchase of receivables, credit guarantee consortia (solely for the protection of receivables and the better management of the rights of the Controller in relation to each commercial relationship);
- XIII. parties with which it is necessary to interact in order to set down or execute the contract (e.g. hosting providers or providers of e-mail forwarding platforms);
- XIV. other companies, bodies and/or natural persons that carry out directly relevant or supporting activities or that assist with the execution of contracts and services (e.g. companies engaged in envelope stuffing and the sorting of correspondence).

D. Transfer of data

The personal computers used to store personal data are located in Italy. If necessary in order to replicate stored data for back-up purposes, the Controller may transfer personal data to both EU and non-EU countries. In the latter case, the Controller hereby guarantees that the non-EU transfer of data will be carried in accordance with the privacy requirements established by law, following prior agreement and the adoption of standard contractual clauses.

E. Methods of processing and data retention period

Personal data is processed using the operations indicated in art. 4 of the Privacy

Code and art. 4, point 2, of Regulation (EU) 2016/679 namely: collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing may be carried out using manual, automated, IT and electronic means in order to manage, store and transmit data, while guaranteeing security and privacy.

Personal data is: processed in a lawful and proper manner; collected and recorded for specific, explicit and legitimate purposes and used in other processing operations for reasons compatible with such purposes; exact and, if necessary, updated; relevant, complete and not excessive with respect to the purposes for which it was collected and subsequently processed.

Personal data is retained solely for the time needed for the purposes for which it was collected, respecting the principles that limit and minimize its retention pursuant to art. 5, para. 1.c) and d), of the Regulation.

Personal data is retained to comply with legal obligations in accordance with the principles that require such retention to be indispensable, not excessive and pertinent.

Gruppo Florence S.r.l. may retain personal data after termination of the contractual relationship in order to comply with regulatory requirements, having regard for the laws on time expiry (10 years); subsequently, when the reasons for processing no longer apply, the data will be deleted, erased or simply retained in an anonymized form.

If consent has been given, personal data will be retained until the date on which such consent for processing is revoked (plus the time needed to process the request).

F. Rights of data subjects

Data subjects have the right to access data about them and request its update and completion, its correction if inaccurate or incomplete or, if the data is processed in breach of the law, its erasure.

The Controller must respond within one month of the date of receiving the request, although this deadline may be extended to as much as three months if the request is particularly complex.

Data is processed pursuant to art. 6, para. 1.b), of the Regulation.

In order to exercise the above rights, data subjects may write to: privacy@gruppoflorence.com or send a certified e-mail to the following address: gruppoflorence@legalmail.it.

G. Complaints

Data subjects who believe that their personal data is processed in breach of

the Regulation are entitled to lodge a complaint with the Data Protection Authority (see the institutional website of the Italian Data Protection Authority - Garante: www.garanteprivacy.it), as envisaged in art. 77 of the Regulation, or apply to the appropriate judicial authorities for a remedy (art. 79 of the Regulation).

H. Nature of the communication of data

The communication of personal data is a legal or contractual obligation, or a prerequisite for the completion of a contract.

I. Nature of the provision of data

Provision of the data is mandatory for completion of the contract.

Failure to provide their data will not allow data subjects to complete the contract, making it impossible for the Controller to do the same. In such cases, the latter will be exonerated from all claims of legal significance.

J. Purposes other than processing

The Controller may wish to process the personal data further, for purposes other than those for which it was collected. In that case, before carrying out such additional processing, the Controller will provide data subjects with information about those purposes and all other relevant details.

K. Profiling

The Controller does not use automated processes for profiling purposes.

L. Consent for processing

Processing for the purposes indicated above in letter B), points 1 to 3, does not require consent from the data subjects concerned.