

INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATED TO RELATIONSHIPS WITH POTENTIAL SUPPLIERS AND SUPPLIERS

The following information is intended for individuals, including professionals, sole proprietors and representatives/contact persons of companies, entities, associations and foundations, hereinafter referred to as "Data Subjects".

Identity and contact details of the Data Controller

Vetroelite s.r.l., hereinafter also referred to as "Vetroelite" or "Data Controller", with registered office in Via Alessandro Manzoni, 38 - 20121 - Milan (MI), and contactable at the e-mail address info@vetroelite.com, at the certified e-mail address vetroelite@legalmail.it or at the telephone number +39 0422 205 711.

Categories of data and their source

Vetroelite processes personal data of a common nature (e.g. personal details, contact details, data relating to identification/recognition documents, data relating to work activities, including professional certificates and qualifications) and data of a particular nature (e.g. data relating to suitability for work): this information may be collected from the data subject and/or from third parties (e.g. other employees and collaborators of the company).

Purposes and legal bases

- A. Pre-contractual management:** personal data is processed for all purposes related to obtaining information and/or quotes.
- B. Management of the contractual phase:** personal data is processed for all purposes related to the management of the contractual relationship in all its phases (e.g. appointment management, logistics organisation and fulfilment of regulatory obligations incumbent on the Data Controller).
- C. Defensive purposes:** the Data Controller may need to process personal data for the management of disputes and out-of-court or judicial litigation.

Purpose	Legal basis (common data)	Legal basis (special categories of data)
A.	Legitimate interest of the Data Controller connected with the search for potential suppliers and the collection of information and/or quotations.	/
B.	Legitimate interest of the Data Controller in conducting business relations correctly in compliance with applicable legislation; Performance of the contract; Compliance with legal obligations.	Fulfilment of obligations under labour law.
C.	Legitimate interest of the Data Controller in establishing, exercising or defending a right.	Establishing, exercising or defending a right.

Retention period

Purpose	Retention period
A.	Time necessary to obtain the requests made and subsequent communications.
B.	10 years from the termination of the contract.
C.	10 years from the final resolution of the dispute.

Nature of the provision and consequences of refusal

Purpose	Nature	Consequences
A.	Necessary	Impossibility of requesting and obtaining the necessary information.
B.	Necessary	Inability to initiate or continue the business relationship.

C.	Necessary	Inability to manage the dispute.
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Scope of communication

The data is processed by internal staff authorised for specific tasks and is communicated externally according to the following rules

Purpose	Categories of external recipients
A.	External consultants.
B.	Credit institutions, external consultants, entities to whom communication is mandatory by law, business partners (customers/suppliers).
C.	Law firms; Judicial authorities.

Since the data is also processed using IT tools, it may also be visible to persons who provide assistance/maintenance on these systems.

Transfer of data to a third country or international organisation

The Data Controller does not transfer personal data outside the European Economic Area.

Rights of data subjects

The data subject to whom the personal data refer is entitled to the following rights:

Access: it is possible to know whether your personal data is being processed and, if so, to obtain access to it and request a copy.

Rectification: you may request that your personal data be updated, corrected (if inaccurate) and supplemented if incomplete.

Deletion: you may request the deletion of your personal data under certain circumstances (for more information, please contact the Data Controller).

Restriction: you may request that your data be marked so as to restrict its processing in the future, under certain conditions (for more information, please contact the Data Controller).

Objection: you may object to the processing of your personal data, for reasons related to your particular situation, where the processing is based on legitimate interest or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

Portability: you may receive the personal data provided to the Data Controller in a structured format and request that it be transmitted to another data controller if the processing is based on consent or on a contract and is carried out by automated means.

Withdrawal of consent: you may withdraw your consent for the purposes for which it was requested, without prejudice to the lawfulness of the processing carried out up to that point.

The rights that can be exercised in practice with regard to the processing activities carried out are:

Purpose	Exercisable right						
	Access	Rectification	Erasure	Restriction	Objection	Portability	Withdrawal of consent
A.	X	X	X	X	X		
B.	X	X	X	X	X	X	
C.	X	X	X	X	X		

To exercise the above rights, you can use the form available at the link <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and send it to the following address: info@vetroelite.com. The data subject may request further details regarding the above information (e.g. legitimate interest balancing test or list of data processors) from the same address. It is possible to lodge a complaint with a supervisory authority: for Italy, the Data Protection Authority (www.garanteprivacy.it).