

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

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This privacy notice is provided in accordance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (hereinafter "Regulation" or "GDPR"), Legislative Decree 196/2003 (as amended) and applicable national and European legislation and applies to OQEMA S.p.A. suppliers.

### **1. Data Controller and Data Protection Officer**

The Data Controller is OQEMA S.p.A. (hereinafter "Data Controller" or "Company"), with registered office in Centro Direzionale Milanofiori Strada 1 Palazzo F3 - 20057 Assago (MI), P.IVA 00080290182.

You may contact the Data Controller for any matter concerning the processing of your personal data at the following address: [privacy@oqema.it](mailto:privacy@oqema.it)

OQEMA S.p.A. has not appointed a Data Protection Officer (DPO) pursuant to Article 37 of the GDPR.

### **2. Categories of personal data processed**

The Data Controller can process the following categories of personal data:

- **Common data:** personal, contact, bank, tax, VAT number, data needed for invoicing.
- **Personal data relating to criminal convictions and offences (Art. 10 GDPR):** e.g. anti-mafia certifications.

Special categories of personal data under Art. 9 of the GDPR are not processed.

### **3. Purpose and legal basis for data processing**

Your personal data will be processed for the purposes described below:

- Establishment, management, and termination of the existing contract with the Data Controller:** the data will be processed for the purpose of establishing and managing the contract to which the data subject is a party.  
*Legal basis:* performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6(1)(b) GDPR).
- Access control and areas at risk:** your data will be processed to ensure the safety of personnel and third parties, to ensure the protection of the Company's assets and to help identify possible criminals by facilitating, in the event of the commission of unlawful acts, the protection of violated rights.  
*Legal basis:* legitimate interests pursued by the Data Controller consisting of "organizational and production needs, safety at work and the protection of Company assets" (Art. 6 par. 1 (f) GDPR).
- Fulfilment of legal obligations:** the data will be processed to fulfil the obligations imposed by law and/or regulations and, in general, by the civil, fiscal and tax legislation in force from time to time.  
*Legal basis:* compliance with a legal obligation to which the Data Controller is subject (Art. 6, paragraph 1, letter c) GDPR).
- Exercise and/or defense of a right in judicial and/or extra-judicial proceedings:** your data may be processed by the data controller in connection with the exercise and/or defense of a right of the data controller in judicial and/or extra-judicial proceedings.  
*Legal basis:* legitimate interests pursued by the Data Controller consisting in the exercise and/or defense of a right in judicial and/or extra-judicial proceedings (Art. 6(1)(f) GDPR).
- Processing of judicial data and/or data likely to reveal the possible existence of criminal convictions as well as ongoing criminal proceedings:** such data will be processed, in addition to what has already been generally specified for the other categories of personal data, also in compliance

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with the provisions of Article 10 of the GDPR, i.e. only under the control of the public authority or if the processing is authorized by Union or Member State law that provides appropriate safeguards for the rights and freedoms of the data subjects.

The provision of personal data is mandatory for the performance of the activities foreseen in this paragraph "Purposes and legal basis for data processing", letters a), c) and e), and any refusal to provide them will result in the impossibility of the performance and regular management of the contract, as well as the fulfillment of the legal and/or contractual obligations assumed towards you.

We inform you that your consent is not required for the processing of your personal data as described above, since the processing is necessary for the fulfilment of legal obligations and/or obligations arising from the contract to which you are a party.

## **4. Storage period of personal data**

The personal data provided will be kept for no longer than is strictly necessary to achieve the purposes for which they were collected, as well as for any longer period necessary for the fulfillment of legal obligations in the administrative-accounting, tax, fiscal and civil law fields, as well as for purposes of judicial protection, and in any case no longer than the ordinary prescription terms. At the end of the storage period, your personal data will be deleted or made anonymous.

## **5. Methods of data processing**

Processing will be carried out in accordance with the provisions of Chapter II (Principles) and Chapter IV (Controllers and Processors) of the GDPR. In particular, data will be processed lawfully, fairly and transparently to the data subject, collected for specified, explicit and legitimate purposes, and adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Data processing is carried out using paper media and electronic tools, with appropriate measures to ensure the security and confidentiality of data, aimed at preventing unauthorized access, loss or destruction of information. The data may be processed by persons, internal or external, who are specifically authorized and committed to confidentiality.

## **6. Communication of personal data**

For the purposes described in this privacy notice, your data may be disclosed to all parties who need to have access to it to carry out supporting, instrumental and ancillary activities to those of our company, inherent in the contractual relationship between us, to the extent strictly necessary for the performance of the aforementioned tasks.

The data may also be processed by third parties who carry out activities on behalf of the Data Controller in their capacity as External Data Processors (e.g. credit institutions, professional firms, suppliers/consultants who manage and/or participate in the management and/or maintenance of the electronic and/or telematic tools used by us, insurance companies for the provision of insurance services) for the time strictly necessary for the optimal performance of such service. In any case, your data will be made accessible only to those within the company who need it in connection with the performance of their duties or hierarchical position. Such persons will be duly instructed to avoid loss, destruction, unauthorized access, or unauthorized processing of the data itself.

The updated list of External Data Processors and persons authorised to process personal data is available to the data subject upon written request to the Data Controller. Without the data subject's express consent (ex art. 6 lett. b) and c) GDPR), the Data Controller may communicate your data to supervisory bodies, judicial authorities as well as to all other entities to which the communication is mandatory under an express legal provision.

## **7. Dissemination of personal data**

Your data will not be disseminated to unspecified parties.

## **8. Transfer of personal data to third countries**

The Company stores your personal data on servers located within the European Union. However, should the Company transfer personal data to third countries outside the EU, for needs strictly related to the performance of your work duties, the Company undertakes to carry out such transfers in compliance with the provisions of Chapter V (Data Transfers to third countries or international organizations) of the GDPR: in particular, on the basis of an adequacy decision of the European Commission or on the basis of adequate safeguards pursuant to Articles 46 et seq. of the GDPR.

## **9. Exercise of data subject rights**

As a data subject, you that you have the possibility to exercise the rights provided by the Regulation, namely:

- a) the right to obtain confirmation as to whether or not personal data concerning you are being processed and, if so, access to such personal data and the following information (Art. 15 GDPR): (i) the purposes of the processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular whether they are third countries or international organizations;
- b) the data subject will also (where applicable) have the possibility to exercise the rights set forth in Articles 16-22 GDPR (right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object, right not to be subject to automated decision making, including profiling).

The data subject may, at any time, contact the Data Controller to exercise the aforementioned rights using the contact details indicated in point 1 of this notice. The data subject may also contact [privacy@oqema.it](mailto:privacy@oqema.it), as well as to report any violations of the rules on the processing of personal data, and to avail of the data breach service under the authority and direct control of OQEMA S.p.A.

The Company will respond to your requests - in writing in hard copy or electronic format - at the latest within one month of their receipt, or within 3 months in cases of particular complexity. In any case, the Company will explain to you the reason for the wait within one month of your request and, if the request is manifestly unfounded, excessive, or repetitive, you may possibly be charged a fee.

If the Data Controller fails to comply with your request, we will provide you with feedback about the reasons for non-compliance, without prejudice in any case to your right to file a complaint with a supervisory authority or judicial review within one month of receipt of the request.

## **10. Amendments to this privacy notice**

If this document is subject to substantial changes, the Data Controller undertakes to bring them to your attention by means of an appropriate notice before they come into force.

**Data Controller**  
**OQEMA S.p.A.**

Assago 20.04.2026