

## **PRIVACY STATEMENT FOR THE PROCESSING OF SUPPLIERS' PERSONAL DATA**

*(Last update March 2026)*

**Ergosud S.p.A.**, with registered office in Via di San Basilio 72 - 00187 Rome, Fiscal Code and VAT no. 13243061002, as the Data Controller (hereinafter, "**Data Controller**"), informs you - pursuant to Articles 13 and 14 of the EU Regulation 2016/679 (hereinafter, "**GDPR**") and the current national legislation on the protection of personal data - that your personal data will be processed, with the following methods and for the following purposes:

### **1. Object of the Processing**

The Data Controller processes identifying and non-sensitive personal data (hereinafter, "**Personal Data**" or also "**Data**") communicated by you, or by third parties provided to us on your instructions, for the purposes of entering into and/or executing a contractual relationship with the Data Controller. In particular, the Controller processes:

- (i) name, surname, date and place of birth, home address, tax code, identity card, image referring to you and/or referring to the legal representative;
- (ii) name, surname, date and place of birth, tax code, identity card, image and any further information that you may have communicated referring to your employees as well as to self-employed workers, sub-contractors and the employees of sub-contractors hired.

### **2. Purposes of the Processing**

Your Personal Data are processed, without your prior express consent, for the following Purposes:

- a) the execution of the contract and/or the fulfilment of pre-contractual commitments, in particular for:
  - (i) the management of pre-contractual and contractual relationships;
  - (ii) the execution of the contract;
  - (iii) the management of the related personal section on the Data Controller's supplier register;
  - (iv) the management of receipts and payments;
  - (v) the management of the accesses to the company perimeter;
- b) the compliance by the Data Controller with legal obligations, such as:
  - (vi) the compliance with the obligations provided for by laws, regulations or national and EU legislation or imposed by the relevant Authorities;
  - (vii) the compilation and processing of tax returns and related fulfilments;
  - (viii) bookkeeping and related fulfilments.
- c) the pursuit of a legitimate interest of the Data Controller, in particular:
  - (ix) the performance of statistical and internal control purposes;
  - (x) the prevention and repression of unlawful acts, the creditworthiness check and the anti-fraud activities, the protection of the company's assets as well as the protection of the rights and legitimate interests of the Data Controller and/or third parties, also in court: the interest of the Data Controller corresponds to the constitutionally guaranteed right of action (Article 24 of the

Italian Constitution) and, as such, is socially recognised as prevailing over the interests of the individual data subject.

### **3. Modalities of the Processing**

The processing of Personal Data is carried out, both via hardcopy (paper) and electronic modalities, by means of the following processing operations: collection, registration, updating, organisation, storage, consultation, elaboration, amendment, selection, mining, confrontation, usage, interconnection, blockage, cancellation and destruction of Data.

Your personal data are subject to electronic and possibly automated processing.

Your personal data are protected in such a way as to minimise the risk of destruction, loss (including accidental loss), unauthorised access/use or use incompatible with the original purpose of collection. This is achieved with the technical and organizational security measures implemented by the Data Controller.

### **4. Data Storage**

The Data Controller shall process the Personal Data for a duration that is necessary to fulfil the above purposes and anyway for no longer than 10 years from the termination of the contractual relationship.

### **5. Provision of Data**

The provision of Personal Data is mandatory. Failing this, it will not be possible to enter into or execute the contractual relationship with the Data Controller.

### **6. Access to Data**

Your Data may be made accessible to:

- (i) employees and/or collaborators of the Data Controller (e.g. employees of the Procurement Department) and/or other EPH Group Companies, in light of their role of Persons in charge of the processing and/or internal Data Processors and/or system administrators;
- (ii) third companies and/or other subjects (e.g. payroll consultant, IT service provider, data-processing companies, etc.) carrying out outsourcing activities on behalf of the Data Controller, as external Data Processors.

### **7. Data Communication**

Your Data may be communicated, even without your express consent, to the following entities that will process them as independent data controllers, where requested by them:

- (i) Ministry of Finance, Revenue Agency and ministerial bodies;
- (ii) Local authorities (regions, provinces, municipalities);
- (iii) Regional and Provincial Tax Commissions;

Your Data may also be communicated to third parties (e.g. partners, freelancers, credit institutions, etc.), in their role as independent data controllers, for the performance of instrumental activities for the above-mentioned purposes.

### **8. Data Transfer**

Your Data shall not be disseminated and/or transferred to extra-EU countries.

### **9. Data Subject's Rights**

The Data Controller informs you that you, as Data Subject, have the right, if restrictions established by law do not apply, to:

- (i) obtain confirmation of the existence or inexistence of Personal Data relating you, even if not yet registered, and their communication in a comprehensible way;
- (ii) obtain the indication and, if necessary, the copy of the: a) source and category of the Personal Data; b) logic applied in case the processing is performed by means of electronic instruments; c) purposes and modalities of the processing; d) identification references of the Data Controller and the Data Processors; e) subjects or categories of subjects to whom Personal Data may be communicated or who may come to know, especially if recipients are extra-EU countries or international organizations; e) period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period; f) existence of an automated decision-making process, including profiling, and, in this case, information about the logic involved, the significance and consequences for the data subject; g) existence of adequate safeguards in case of transfer of Personal Data to an extra-EU country or international organization;
- (iii) obtain, without undue delay, the update, the rectification or, whether you are interested, the integration of incomplete Data;
- (iv) obtain the cancellation, the transformation into anonymous form or blocking of the Data: a) processed in breach of the law; b) no longer necessary in relation to the purposes for which the Data have been collected or subsequently processed; c) if you withdraw consent on which the processing is based and there is no other legal ground for the processing; d) if you object to the processing and there are no overriding legitimate grounds for the processing; e) in compliance with a legal obligation; f) referred to children. The Data Controller may refuse to erase them when the processing is necessary: a) to exercise the right of freedom of expression and information; b) in compliance with a legal obligation, for the performance of a task carried out in the public interest or in the exercise of official authority; c) for reasons of public healthcare interest; d) to achieve purposes in the public interest, scientific or historical research purposes or statistical purposes; e) for making legal claims;
- (v) obtain the restriction of processing when: a) the accuracy of the Personal Data is contested; b) the processing is unlawful, and the data subject opposes the erasure of the Personal Data; c) Data are required by you for your exercising of legal claims; d) pending verification whether the legitimate grounds of the Controller override those of the data subject;
- (vi) receive the Personal Data concerning you in a structured, commonly used and machine-readable format and transmit those data to another Data Controller without hindrance or - if technically feasible - obtain direct transmission from the Data Controller to another controller, where the processing is carried out by automated means;
- (vii) object, in whole or in part, on legitimate grounds, to the processing of personal data concerning you, even though they are relevant to the purpose of collection;
- (viii) lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali).

In the aforementioned cases, the Data Controller shall inform the third parties to which your Personal Data have been communicated of the possible exercise of your rights, unless this proves impossible or involves a manifestly disproportionate effort compared to the right protected.

#### **10. Modalities of Exercise of Rights**

You shall be able to exercise your rights anytime:

- by sending a registered letter with return receipt to the address of the Data Controller;
- by sending an email to [DPCcommittee@eproduzione.it](mailto:DPCcommittee@eproduzione.it).



#### **11. Data Controller and Data Processor**

The Data Controller is Ergosud S.p.A., with sole shareholder, with registered office in Via di San Basilio 72 – 00187 Rome, Fiscal Code and VAT no. 13243061002. The updated list of Data Processors, Persons in charge of the processing and system administrators is kept at the office of the Data Controller.

The Data Controller

**Ergosud S.p.A.**