

PRIVACY MANUAL	IMPERTEK SRL Via Po, 507 30022 Ceggia (VE) Tel. +39 0421 322525 a.s. - Fax +39 0421 322756 eM.: info@impertek.com
Documentation drawn up in compliance with the provisions of the GDPR 2016/679 "General Data Protection Regulation" and current domestic legislation	

PERSONAL DATA PROCESSING POLICY PURSUANT TO AND FOR THE PURPOSES OF ART. 13 OF (EU) REGULATION 2016/679 ("GDPR")

Hereby this policy, IMPERTEK SRL provides **Data Subjects** attributable to its Suppliers with information on the processing of personal data concerning them.

Who processes personal data

The Data Controller, i.e. the person who determines the purposes and means of the processing of personal data, is IMPERTEK SRL, with registered office in Via Po, 507 - 30022 Ceggia (VE), who can be contacted at the following addresses: +39 0421 322525, info@impertek.com

Purpose and legal basis of processing

Personal data is processed for the following purposes and in compliance with the respective legal bases:

<i>Purpose</i>	<i>Legal basis (Art. 6 GDPR)</i>
Compliance with all transactions required by regulatory obligations, tax provisions and anti-money laundering regulations;	Legal obligation.
Establishment and execution of contractual relationships in progress; Transactions strictly connected and instrumental to the initiation of the aforementioned relationships, including the acquisition of preliminary information for the execution of the Contract; Management of relations with the Supplier for activities of administration, accounting, orders, shipping, invoicing, services, management of any out-of-court dispute resolution where applicable	Execution of a contract or pre-contractual measures.
Management of any legal disputes.	Legitimate interest of the Data Controller, strictly limited to the assessment, exercise and defence of a right
Possible evaluation of the supplier based on compliance parameters for management systems and business processes, based on uniform international standards (e.g. ISO)	Legitimate interest of the Data Controller, strictly limited to the maintenance of the standards of management systems and business processes

Nature of the provision of data

The provision of personal data necessary for the fulfilment of legal obligations, for the establishment of the contractual relationship or for its execution is mandatory. Failure to provide data will make it impossible to follow up on the Data Subject's requests or to perform the contract.

Disclosure of data

Without prejudice to compliance with current regulations, personal data may be communicated, exclusively for the pursuit of the purposes mentioned in this policy, to:

- Companies belonging to the same business group;
- Subjects to which the data must be disclosed in order to fulfil a contract of which the Data Subject is party, or to fulfil pre-contractual measures taken at the request of said Data Subject and, in general, to achieve the purposes identified in this privacy policy;
- Subjects responsible for credit management such as, for example, factoring companies, credit institutions, debt collection companies, credit insurance companies, business information service companies;
- In particular, subjects who carry out processing on behalf of the Data Controller as Managers in compliance with art. 28 GDPR, such as, by way of example: professionals and/or companies appointed to carry out activities in the administrative-accounting, legal, commercial, management, technical, technical-IT fields. The complete and up-to-date list of Data Processors can be consulted by entitled users upon request, at the Data Controller's registered office;
- Subjects authorised to access the data by current legislation and/or to which the data must be disclosed in order to fulfil legal obligations.

Personal data may be processed by employees and collaborators assigned to the competent offices of the Data Controller, explicitly authorised to process on the basis of art. 29 of the GDPR and current domestic legislation.

Processing of data abroad

The data will not be transferred outside the European Union; any use of technological solutions involving the transfer of data to non-European third countries may only take place in compliance with arts. 44 et seq. GDPR (in the presence of adequacy decisions and/or appropriate safeguards, provided that the data subjects have enforceable rights and effective remedies, or provided that one of the specific derogations envisaged by the legislation are applicable).

Data retention period.

The data are kept for a period of time not exceeding the achievement of the purposes indicated herein. In particular, the data will be stored in our archives pursuant to the following parameters:

- Data processed for the fulfilment of the obligations referred to in art. 2220 of the Civil Code: 10 years, without prejudice to any late payments or fees that justify the extension;
- Data processed for supplier evaluation purposes: 36 months;
- Data processed for purposes other than those mentioned above, within the scope of the contractual relationship and as envisaged therefrom: until the expiry of the contract and/or commercial supply relationship.

In relation to specific statutory limitation periods, data required for the ascertainment, exercise or defence of a legal right may be subject to longer retention periods.

The obsolescence of stored data in relation to the purposes for which it was collected is periodically checked.

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Rights of the data subject

The Data Subject shall have the right, in the cases envisaged, to obtain access and rectification or erasure of their personal data or the restriction of processing which concerns them, or to object to processing (arts. 15 et seq. of the GDPR), by contacting the Data Controller at the following email address: info@impertek.com.

Right to complain

Data subjects who believe that the processing of their personal data takes place in breach of the provisions of the GDPR have the right to lodge a complaint with the Data Protection Authority, as envisaged by art. 77 of the GDPR, or taking legal action (art. 79 of the GDPR).

Ceggia, 09/06/2025

IMPERTEK SRL

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