



Tethis S.p.A.

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INFORMATION ON THE PROCESSING OF PERSONAL DATA OF SUPPLIERS

The company **Tethis S.p.A.**, as the Data Controller (the "**Company**" or the "**Data Controller**"), informs the legal representative, employees and contact persons (the "**Data Subjects**", or in the singular, the "**Data Subject**") working at the Company's suppliers (the "**Suppliers**"), pursuant to the current legislation on the protection of personal data (the "**Privacy Policy**") therein including the EU Regulation 2016/679 (the "**GDPR**"), that the processing of personal data acquired in the context of the contractual - and/or pre-contractual - relationship between the Data Controller and the Suppliers (the "**Contract**"), is carried out for the following purposes and in the following manner.

Data Controller and Data Protection Officer

The Data Controller for the processing of personal data is Tethis S.p.A with operational headquarters in Milan, via Olgiati, 5 - 20143.

The Data Protection Officer can be contacted at e-mail: dpo@tethis-lab.com.

Data processed

As part of the Contract to which the Data Subject is a party, the Data Controller processes personal data disclosed by the Data Subject or otherwise acquired by the Data Controller pursuant to the "*Data Source*" section below, such as, but not limited to: name, address, or other personal identification, job title and/or employment information, fiscal code and other personal identification numbers, e-mail address, financial and tax data required for payment and billing purposes.

Origin of personal data

Personal data not collected directly from Data Subjects were disclosed to the Company, either directly or by publication on its website, or collected from public lists.

Purpose of processing and legal basis

The Data Controller informs the Data Subjects that the personal data acquired by the Company prior to the establishment of the Contract, during the course of the Contract or after its termination, will be processed by the Company in compliance with the Privacy Regulations and confidentiality obligations, for the following purposes (the "**Purposes**") and on the basis of the following regulations ("**Legal Basis**"):

- a) legal and economic treatment within the scope of the Contract: formalization, stipulation and execution of the Contract; keeping of accounts and performance of related obligations, compilation and processing of tax returns and related obligations; monitoring of contractual obligations;

- Legal basis: The processing is necessary for the performance of a contract to which the Data Subject is a party or for the performance of pre-contractual measures taken at one's request, pursuant to Article 6(1)(b) of the GDPR
- b) Fulfilling legal obligations to which the Company is subject;
 - Legal Basis: The processing is necessary to fulfil a legal obligation to which the Data Controller is subject, pursuant to Article 6(1)(c) of the GDPR.
- c) management of litigation, as well as the exercise of the Data Controller's rights in court.
 - Legal Basis: The processing is necessary for the pursuit of the legitimate interest of the Data Controller to protect its rights in court, pursuant to Article 6(1)(f) of the GDPR.

Nature of provision of data

The processing of personal data is essential for the proper performance of the Contract and their provision is mandatory to properly fulfil the current regulations and obligations under the Contract.

Therefore, any refusal of the Data Subjects to provide personal data, in whole or in part, could result in the impossibility for the Data Controller to execute the Contract or to properly carry out the fulfilments required by the regulations in force.

Method of treatment

The Data Controller also informs the Data Subjects that the processing of personal data, pursuant to Article 4 GDPR, may consist of the following activities: collection, recording, organization, storage, consultation, processing, communication by transmission or any other form of making available, restriction, deletion and destruction of personal data.

The Processing may be carried out with or without the aid of electronic or otherwise automated tools but, in any case, with tools that ensure compliance with the requirements and requirements of confidentiality and security provided by the legislation in force from time to time and applicable.

Access to personal data

Without prejudice to communications made in fulfilment of legal obligations and the Contract, personal data may be made accessible to:

- a) employees of the Company, duly authorized by the Data Controller, in their capacity as authorized persons and/or, if applicable, internal System Administrators of the Company;
- b) third parties (such as, for example, software and IT service providers) and third-party companies, possibly appointed as Data Processors, who work on behalf of the Company in maintaining, updating and/or overhauling the information systems or equipment that may be used for data processing;
- c) consultants and freelancers in single or associated form (e.g. accountants and accounting experts; auditors; lawyers).

Disclosure of data

The Data Controller also informs the Data Subjects that personal data may be disclosed to the following entities as Autonomous Data Controllers:

- a) Banks and credit institutions, financial or insurance companies;

- b) Third parties that may be involved in the provision of goods and services of the Company.

Personal data of Data Subjects will not be disclosed to recipients other than those indicated above in this policy.

Transfer of data outside the EU

Personal data of Data Subjects will not be disclosed to recipients other than those indicated above in this policy.

Any transfer of personal data to non-EU countries may only take place under the terms and with the guarantees provided by the Privacy Regulations and, in particular, in accordance with Articles 44 - 49 of the GDPR.

Period of data retention

The personal data of the Data Subjects will be retained and processed for the duration of the Contract and, after its termination, for whatever reason, for a period not exceeding 10 years (i.e., the ordinary limitation period) (the "**Retention Period**").

At the end of the Retention Period, personal data will be deleted, unless there are additional legitimate interests of the Data Controller and/or legal obligations that make their retention necessary.

Rights of Interested Parties

The Data Controller informs the Data Subject that one may always exercise, pursuant to Articles 15-23 GDPR, the right to:

- to request access to personal data, to request their rectification or updating if incomplete, erroneous or collected in violation of the Privacy Regulations and any other applicable law, or to receive (or to transmit directly to another data controller) one's personal data in a structured, machine-readable format in common use;
- Object to the processing carried out for a legitimate interest of the Data Controller upon the occurrence of special situations affecting the Data Subject;
- to obtain, where the requirements set forth in the Privacy Regulations-including Articles 17 and 18 of the GDPR-are met, the restriction of the processing of personal data, as well as to request the deletion or anonymization of such data.

The Data Subject may, at any time, exercise the above rights in the following ways:

- by sending an e-mail to the Data Controller at: privacy@tethis-lab.com;
- by sending an e-mail to the DPO at: dpo@tethis-lab.com; or
- via regular mail, to the Data Controller's operational headquarters.

The Data Controller also informs that, in accordance with the Privacy Regulations, the Data Subject has the right to lodge a complaint with the Data Protection Authority by following the procedure indicated on the website www.garanteprivacy.it.

Information updated on 10/09/2024.