

**SUPPLIER INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA
PURSUANT TO ARTICLE 13 OF REGULATION (EU) NO 2016/679**

Dear All,

Pursuant to Art. 13 of the Regulation (EU) No. 2016/679 (hereinafter referred to as "**GDPR**"), ICM SpA (hereinafter referred to as "**ICM**" or the "**Controller**") informs you that the personal data relating to your company (hereinafter referred to as the "**Supplier**") and to natural persons acting on its behalf (hereinafter referred to as the "**Data**"), collected from the Supplier or from third parties, will be processed in compliance with the provisions of the GDPR and with this information notice.

It is understood that it is the responsibility of the Supplier to inform natural persons acting on its behalf of the processing of personal data referred to in this information notice and to request their consent, where required.

Data Controller.

The Data Controller is ICM, with its headquarters in Viale dell'Industria, 42, 36100 Vicenza, tel. +39 0444 336111, e-mail icm@gruppoicm.com.

Purpose and legal basis of the processing.

Data will be processed:

- a) to assess the technical, economic, legal and financial suitability of the Supplier as well as to verify the compliance with the requirements set for the Supplier, as part of the qualification process, for the purposes of including the Supplier in the Supplier database of the Controller and of updating the same; to ensure compliance with the provisions of the Anti-Mafia Code – Italian Legislative Decree No. 159 of 6 September 2011, as amended and supplemented;
- b) to comply with the legal obligations to which the Controller is subject;
- c) for the execution of contracts to which the Supplier is a party or for the adoption of pre-contractual measures adopted at the request of the same;
- d) for the establishment, exercise or defense of legal claims.

The processing of the Data for the purposes under a) and d) does not require the consent of the Supplier as it is necessary for the pursuit of the legitimate interest of the Data Controller, pursuant to article 6, paragraph 1, letter f) of GDPR. The processing of the Data for the purposes under b) does not require the consent of the Supplier as this processing is necessary to fulfill the legal obligations to which the Data Controller is subject, pursuant to article 6, paragraph 1, letter c) of GDPR. The processing of the Data for the purposes under c) and d) does not require the consent of the Supplier as the processing is necessary for the execution of contracts to which the Supplier is a party or for the adoption of pre-contractual measures adopted at the request of the same, pursuant to article 6, paragraph 1, letter b) of GDPR.

Provision of data and consequences in case of failure to provide data.

The provision of the Data for the purposes under a) and d) is optional but necessary to pursue the legitimate interests of the Data Controller. The provision of the Data for the purposes under b), c) and d) is optional, but necessary for the fulfilment of legal and contractual obligations. In all these cases, failure to provide the data will have no consequences on the contract but will make it impossible for the Data Controller to establish business relations with the Supplier.

Recipients or categories of recipients.

- The Data may be made accessible, brought to the knowledge of or communicated to the following subjects, who will be appointed by the Data Controller, as the case may be, as Managers or will act as autonomous Data Controllers:

- companies of the group to which the Data controller belongs (parent companies, subsidiaries, affiliates), employees and/or collaborators in any capacity of the Data controller and/or companies of the group to which the Data controller belongs;
- public or private subjects, natural or legal persons, of which the Data controller makes use for the performance of activities instrumental to the achievement of the above mentioned purpose or to which the Data controller is required to communicate the Data, by virtue of legal or contractual obligations.

In any case, the Data will not be disseminated.

Transfer of Data to third countries.

Data will circulate within EU countries. In addition, ICM may transfer the data to the following third countries if necessary, based on the conditions of legitimacy indicated in relation to each of them:

Storage period.

The Data will be stored for a maximum period of time equal to the limitation period of the rights enforceable by the Data controller, as applicable from time to time.

Access, cancellation, restriction and portability rights.

The interested parties are granted the rights set out in Articles 15 to 20 of the GDPR. By way of example, each interested party may:

- a) obtain confirmation as to whether personal data concerning him/her are being processed;
- b) where processing is in progress, obtain access to personal data and information relating to the processing, and request a copy of the personal data;
- c) obtain rectification of inaccurate personal data and integration of incomplete personal data;
- d) obtain, where one of the conditions laid down in Article 17 of the GDPR is met, the deletion of personal data concerning him/her;
- e) obtain, in the cases provided for in Article 18 of the GDPR, the limitation of the processing;
- f) receive personal data concerning him/her in a structured, commonly used and machine-readable format and request their transmission to another data controller, if technically feasible.

Right of opposition.

Each interested party has the right to object at any time to the processing of his/her personal data carried out in the pursuit of a legitimate interest of the Data controller. In case of opposition, the personal data of the data subject will no longer be processed, provided that there are no legitimate reasons for processing that override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Right to revoke consent.

Where consent is required for the processing of personal data, each data subject may also revoke the consent already given at any time, without prejudice to the lawfulness of the processing based on the consent given before the revocation. Consent may be revoked by writing an e-mail to the following address icm@gruppoicm.com.

Right to lodge a complaint with the Italian Data Protection Authority.

In addition, the provider may lodge a complaint with the Italian Data Protection Authority if they deem that their rights under GDPR have been violated, in the manner indicated on the website of the Italian Data Protection Authority accessible at the address: www.garanteprivacy.it.