



Privacy Policy pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 on the protection of personal data (GDPR)

- Contracted Suppliers -

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter GDPR), Valoridicarta S.p.A. - subsidiary of the Istituto Poligrafico e Zecca dello Stato S.p.A. - with registered office in Via Salaria 691, 00138 Rome, in its capacity as Data Controller, in the person of the pro tempore legal representative (hereinafter also “Valoridicarta” or “Data Controller”), hereby informs you that it shall process your personal data according to the terms and methods specified below.

Valoridicarta also informs you that, by virtue of the “Contract for the supply of administrative and management services” and other corporate agreements, the parent company Poligrafico performs - *inter alia* - for Valoridicarta the service of support for procurement activities, as well as ancillary purchasing activities for Valoridicarta for the award procedures for certain supplies/services.

Taking into account the fact that the execution of these services could involve the processing of personal data by the Poligrafico on behalf of Valoridicarta, as Data Controller, Valoridicarta has appointed the Poligrafico as Data Processor pursuant to Art. 28 of the GDPR.

1. Sources of personal data

The personal data subject to processing (hereinafter “Data”) are collected directly from the data subject, from authorised third parties or from the parent company Istituto Poligrafico e Zecca dello Stato S.p.A. (hereinafter also Poligrafico).

In any case, all data is processed in compliance with the law and the obligations of confidentiality on which the activity of Valoridicarta is based.

2. Categories of personal data

For the pursuit of the purposes described below, Valoridicarta processes the following categories of personal data:

- a) personal and contact details: name, surname, tax code, place and date of birth, residence, telephone number, e-mail address and information found in the registry of the company/business identifying the data subject;
- b) payment details: information relating to payments due (e.g. IBAN);
- c) judicial data: data relating to criminal convictions and crimes or related security measures, in compliance with the legislation in force on public procurement.

3. Purpose and legal basis of data processing

The purposes for the processing carried out and the related legal bases are set out below:

- a) conclusion and performance of a contract with Valoridicarta - **performance of a contract to which the data subject is a party** (Art. 6(1)(b) of the GDPR);
- b) administrative management of the contractual relationship (e.g. bookkeeping, invoicing, payments) - **compliance with legal obligations** (Art. 6(1)(c) of the GDPR) and **performance of a contract to which the data subject is party** (Art. 6(1)(b) of the GDPR);
- c) fulfilment of obligations provided for by law, regulation or EU legislation, such as, by way of example but not limited to: verification of subjective requirements and grounds for disqualification in cases provided for by laws or regulations, regulatory and tax obligations connected to the same contractual relationship or provided for by an order from a public authority - **compliance with legal obligations** (Art. 6(1)(c) of the GDPR);
- d) protection of Valoridicarta's rights - in extrajudicial and judicial proceedings - arising from the contract (e.g. breach of contract, warnings, settlements) – **Valoridicarta’s legitimate interests in defence** (Art. 6(1)(f) of the GDPR);



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- e) combating money laundering and terrorist financing - **compliance with legal obligations** (Art. 6(1)(c) of the GDPR);
- f) internal control activities - **Valoricarta's legitimate interest in conducting verification and monitoring activities in line with company procedures** (Art. 6(1)(f) of the GDPR) and **compliance with legal obligations** (Art. 6(1)(c) of the GDPR).

4. Provision of personal data and consequences of refusal

The provision of personal data is mandatory for the pursuit of the purposes set out in paragraph 3 from (a) to (c). Therefore, refusal to provide compulsory data shall make it impossible to pursue the purposes of processing described in this Privacy Statement, strictly related to the contractual relationship.

With reference to the purposes set out in paragraph 3 from (d) to (f), no new and specific data is required, as Valoricarta will pursue this purpose, where necessary, by processing the data already collected.

5. Processing methods

Your personal data shall be processed using manual processors or electronic or in any case automated, computerized or telematic tools, using logic strictly related to the purposes listed above and, in any case, in such a way as to guarantee the security and confidentiality of the data.

In this regard, Valoricarta uses a wide range of security measures in order to ensure and maintain the security, integrity and accessibility of Personal Data.

Valoricarta has identified the parent company Poligrafico as the entity responsible for the management of the infrastructures, systems and related security measures and, for this purpose, Valoricarta has appointed Poligrafico Data Processor pursuant to Art. 28 of the GDPR.

6. Categories of recipients of Personal Data

Personal Data may be disclosed - for purposes functional to the performance of the contract - to the following categories of subjects, who will process them in their capacity as "Data Processors" pursuant to Article 28 GDPR, specifically appointed and instructed by Valoricarta as Data Controller, or as autonomous and separate "Data Controllers":

- a) parent company Poligrafico, also pursuant to Recital 37 of the GDPR;
- b) Italian National Anti-Corruption Authority (ANAC) for the obligations under the legislation in force;
- c) banks and credit institutions authorized to arrange the payments indicated by the supplier;
- d) companies appointed to provide supplier verification services pursuant to Art. 94 and 95 of Legislative Decree 36/2023;
- e) law firms;
- f) professional firms/companies/consultants providing accounting, fiscal, tax and auditing services;
- g) financial intermediaries for economic/financial obligations relating to the contractual relationship;
- h) companies that perform auditing and certification of financial statements;
- i) companies entrusted with the provision of IT services and/or web platforms;
- j) IT equipment maintenance companies;
- k) parties, entities or authorities to whom it is mandatory to disclose your personal data by law or by order of public authority;
- l) FIU - Financial Intelligence Unit of the Bank of Italy for anti-money laundering checks;
- m) companies that support Valoricarta in retrieving chamber of commerce data, black lists (anti-terrorism lists), information on beneficial owners and political offices, information in the media (newspapers, TV, internet) in the context of anti-money laundering checks.

The updated list of third parties to whom the personal data of the data subject may be disclosed can be requested from the Data Controller at any time, at the contacts indicated below under "Rights of the data subject."



Personal data shall also be processed by personnel of Valoricarta and its parent company Poligrafico specifically authorised to process them pursuant to the GDPR and Art.2-*quaterdecies* of the Privacy Code, as amended.

The personal data processed by Valoricarta are not subject to dissemination, without prejudice to the legal obligations on administrative transparency.

7. Transfers outside the EEA

The data referred to in this privacy statement shall be processed within the European Economic Area (EEA). However, the use of certain instruments by Valoricarta may entail, albeit on a residual basis, the transfer of said data to parties established in countries that do not belong to the European Union (EU) or the EEA (hereinafter referred to as “Third Countries”). Such transfer, in any case, shall be carried out in compliance with Chapter V of the GDPR.

8. Personal data retention period

The personal data referred to in this privacy statement shall be retained for the time necessary to perform the contract and in compliance with civil, fiscal and regulatory laws and in any case for no more than 10 years from the end of the contract. Subsequently, the Data shall be archived until the end of the statutory limitation period with reference to the individual rights that can be exercised by the parties.

After this time, your personal data shall be rendered anonymous or deleted, unless they have to be retained for other and different purposes expressly required by law.

9. Automated decision making

For the pursuit of the processing purposes described above, no decision shall be taken based solely on automated processing that has a legal impact on the data subject or that, similarly, significantly affects the data subject.

10. Rights of the data subject

Pursuant to and in accordance with the GDPR, the Data Subject has the following rights, which may be exercised with regard to Valoricarta:

- a) the right to obtain from the Data Controller, confirmation whether or not personal data concerning them is being processed and, in this case, to obtain access to the personal data and information provided for by Article 15 of the GDPR and, in particular, to the information relative to the purposes of the data processing, the categories of personal data in question, the recipients or categories of recipients to whom the personal data have been or will be disclosed, the retention period, etc.;
- b) the right to obtain the rectification of inaccurate personal data concerning them, as well as the completion of personal data deemed incomplete, again in relation to the purposes of the processing (Article 16 GDPR);
- c) the right to erasure of data (“right to be forgotten”), on the grounds referred to in Article 17 GDPR;
- d) the right to restriction of processing, in the cases provided for by Article 18 GDPR;
- e) the right to object to processing, pursuant to and within the limits of Art. 21 of the GDPR.

These rights can be exercised by sending a request to the Data Protection Officer (DPO) of Valoricarta at the following address: Via Salaria, 691 - 00138 Rome, Italy, or by e-mail to the following addresses: privacy@ipzs.it or rpd@pec.ipzs.it.

Furthermore, we inform you that exercising the above rights may be limited, delayed or excluded - limited to the provisions of Article 2-*undecies* of Italian Legislative Decree 196/2003 and subsequent additions and amendments. - and, in particular, where it may result in actual and concrete prejudice to the conduct of defensive investigations, to the exercise of a right in court.

Finally, we remind you, pursuant to Article 13(2)(d) of the GDPR, that the data subject has the right to lodge a complaint with the Data Protection Authority or other supervisory authorities pursuant to Article 77 of the GDPR.

11. Changes to this Privacy Policy

This policy may be subject to modifications. We therefore recommend checking the Privacy section on the Valoricarta website www.valoricarta.it for possible changes.

Last update: 17.11.2023

signed by the Data Controller
(digitally signed electronic document)