



Privacy notice pursuant to Articles 13 and 14 of EU Regulation No. 2016/679 on the protection of personal data (GDPR)

- Suppliers -

Pursuant to Articles 13 and 14 of EU Regulation No. 2016/679 (hereinafter GDPR), Valoridicarta S.p.A. - a company controlled by the Istituto Poligrafico e Zecca dello Stato S.p.A. - with registered office in Via Salaria 691, 00138 Rome, in its capacity of Data Controller, in the person of its legal representative pro tempore (hereinafter also referred to as "Valoridicarta" or "Data Controller"), informs you that your personal data will be processed by Valoridicarta in the manner and under the terms specified below.

Valoridicarta further informs you that, pursuant to the "Contract for the Provision of administrative and management services", the parent company Poligrafico carries out - *inter alia* - on behalf of Valoridicarta itself, the support service for procurement activities. These include the configuration and management of the telematic system of e-procurement and the sharing of the Suppliers' Register.

Given that the execution of such Services may entail the processing of personal data by Poligrafico on behalf of Valoridicarta, as the Data Controller, the latter has appointed (by means of a separate written agreement) the Poligrafico as Data Processor pursuant to Article 28 of the GDPR.

1. Sources of personal data

The personal data subject to processing are collected directly from you or from third parties who legally hold them (e.g., Public Registers, Chamber of Commerce, Industry, Agriculture and Artisanry) or from the parent company Istituto Poligrafico e Zecca dello Stato S.p.A. (also Poligrafico).

In any case, all data are processed in compliance with the law and the confidentiality that inspire the activities of Valoridicarta.

2. Categories of data obtained from subjects other than the data subject

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

- provided either directly by you to Valoridicarta or to Poligrafico:

- a) personal and contact details: information relating to your name, surname, tax code, place and date of birth, place of residence, telephone number, e-mail address, and information present in the registry of the company/business identifying you;
- b) payment data: information relating to the payment of your entitlements (e.g., IBAN);
- c) judicial data: data relating to criminal convictions and offences or related security measures, provided by you to Valoridicarta, in compliance with the limits of what is authorised by the current legislation on public procurement.

- obtained from third parties:

- a) personal and contact details: information present in the registry of the company/business linked to you;
- b) judicial data: data relating to criminal convictions and offences or related security measures, in compliance with the limits of what is authorised by the current legislation on public procurement.

(The aforementioned categories of personal data are hereinafter collectively referred to simply as "Personal Data").

3. Purpose of processing

Personal data will be processed for the following purposes:

- a) participation in tenders launched by Valoridicarta;
- b) performance of any pre-contractual negotiations and execution of a contract to which you are a party;
- c) administrative, commercial and logistical management of the supply relationship (e.g. bookkeeping, invoicing, payments) that may ensue;
- d) fulfilment of legal, regulatory, and tax obligations related to the same contractual relationship; or required by an order from the Authority;
- e) protection of the rights of Valoridicarta and Poligrafico arising from tender procedures or the contract (e.g., contractual breaches, warnings, settlements);
- f) protocol and archiving pursuant to Italian Presidential Decree No. 445/2000 as amended, as well as compliance with requirements regarding historical accessibility of archive documents and confidentiality

requirements under the Italian Legislative Decree No. 42/2004 as amended.

4. Legal basis and lawfulness of processing

For the purposes indicated in points a), b) and c) of paragraph 3 of this Privacy Notice, the legal basis of the processing, attesting to its lawfulness, is that set out in Art. 6, par. 1, letter b) of the GDPR, i.e., "*processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract*".

The processing carried out for the purposes under letters d) and f) of the same paragraph, is based on legal obligations to which Valoridicarta is subject (Art. 6, par. 1, letter c) of the GDPR).

For the purposes described in letter e), the processing is necessary for the pursuit of the legitimate interest of the company Valoridicarta to protect its rights under the contract (Art. 6, par. 1, letter f) of the GDPR).

The processing of your judicial data will be carried out exclusively within the limits authorised by the current legislation on public procurement (Italian Legislative Decree No. 36/2023);) and in compliance with Art. 10 of the GDPR and Art. 2-octies of the Italian Legislative Decree No. 196/2003, as amended by the Italian Legislative Decree No. 101/2018 (henceforth the "Privacy Code"), and under the supervision of the public authority.

5. Provision of personal data and consequences of refusal

The provision of data is mandatory for the fulfilment of legal and/or contractual obligations.

Therefore, refusal to provide the mandatory data will result in the objective impossibility of pursuing the processing purposes set out in this Privacy Notice (see par. 3).

6. Processing methods

Your personal data shall be processed using manual, electronic, or otherwise automated - computerised or telematic - with logic strictly related to the purposes listed below and, in any case, to ensure the security and confidentiality of the data.

In this regard, Valoridicarta adopts a wide range of security measures to enhance the protection, integrity, and accessibility of Personal Data, and to ensure its ongoing security.

Valoridicarta has designated its parent company, Poligrafico, as responsible for managing the infrastructures, systems, and related security measures, appointing Poligrafico, under a separate written agreement, as Data Processor pursuant to Article 28 of the GDPR.

7. Categories of recipients of Personal Data

Your personal data shall be processed by persons specifically authorized by the Data Controller in compliance with the GDPR and Article 2-quaterdecies of the Privacy Code, and may also be disclosed to third parties (if necessary and contractually bound to Valoridicarta) for purposes related to the execution of the contractual/pre-contractual relationship mentioned in paragraph 3, including the following:

- a) parent company Poligrafico, also pursuant to Recital 37 of the GDPR;
- b) financial administrations and public bodies upon request;
- c) A.N.A.C. ((Italian National Anti-Corruption Authority) for compliance with current regulations;
- d) banks and credit institutions entrusted with the treasury service in executing payments, including those indicated by the supplier;
- e) law firms;
- f) professional firms/companies/consultants providing accounting, tax, tax-related services;
- g) financial intermediaries for economic/financial obligations related to the contractual relationship;
- h) companies carrying out auditing and financial statement certification;
- i) suppliers and managers of Poligrafico's online e-procurement platform (e.g., System Manager), as sub- suppliers of Valoridicarta;
- j) Companies responsible for maintaining Poligrafico's IT equipment, acting as sub-suppliers of Valoridicarta.

A constantly updated list of third-party recipients of your personal data can be requested at any time from the Data Controller, using the contact details provided below.

All parties belonging to the categories to whom Personal Data may be communicated, will use them either as "Data Processors", specifically appointed and instructed by Valoridicarta as the Data Controller, or independently as distinct "Data Controllers".

Personal Data processed by Valoridicarta are not subject to dissemination, without prejudice to the obligations required by administrative transparency regulations (Article 1, paragraph 16, letter b and paragraph 32 of Law No. 190/2012; Italian Legislative Decree No. 33/2012; Italian legislative decree No. 36/2023).

8. Transfers outside the EU

Data covered by this Privacy Notice will be processed within the European Economic Area (EEA).

However, the use of certain tools by Poligrafico may occasionally entail the transfer of data to entities located in outside the European Union (EU) or the EEA (hereinafter, the "Third Countries"). However, such transfers are carried out in compliance with Chapter V of the GDPR.

9. Personal data retention period

Personal Data referred to in this Privacy Notice is retained at the registered office of Valoridicarta for the time necessary to perform the contractual relationship, as well as for the time prescribed by civil, tax and regulatory laws, and in any case no longer than 10 years from the end of the contractual relationship. Subsequently, the Data shall be archived until the statutory limitation period established by law with regard to the individual rights enforceable by the parties.

Once that period has elapsed, your data will be anonymised or deleted, unless its retention is necessary for other and different purposes expressly provided for by law.

Please also note that Valoridicarta is subject to the regulations on registration and archiving pursuant to Italian Presidential Decree No. 445/2000 as amended, as well as compliance with requirements regarding historical accessibility of archive documents and confidentiality requirements under the Italian Legislative Decree No. 42/2004 as amended.

10. Automated decision-making process

For the pursuit of the processing purposes described above, no decision is made solely on automated processing that produces legal effects concerning You or similarly significantly affects You.

11. Data Subject Rights

Pursuant to the GDPR, you are granted the following rights as a data subject, which you may exercise with regard to Valoridicarta:

- a) the right to obtain from the Data Controller, confirmation whether or not personal data concerning you 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 you, 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 may be exercised by sending a request to the Data Protection Officer (DPO) at the following address: Via Salaria, 691 - 00138 Rome, or by e-mail to the following addresses: privacy@ipzs.it or rpd@pec.ipzs.it.

In addition, please note that you have the right to lodge a complaint with the Data Protection Authority or to other supervisory authority pursuant to Art. 13, par. 2, letter d) and Article 77 of the GDPR.

12. Amendments to this Privacy Notice

This Privacy Notice is subject to change. We therefore recommend that you regularly check the Valoridicarta website, Privacy Section, under "Privacy Notice pursuant to Articles 13 and 14 EU Regulation 2016/679, Suppliers".

Last updated: 23 September 2025

The Data Controller
(digitally signed electronic document)