



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

- 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”, the parent company Poligrafico performs - *inter alia* - for Valoridicarta the service of support for procurement activities, including the configuration and management of the electronic procurement system and sharing the supplier register.

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, with a separate written agreement, the Poligrafico as Data Processor pursuant to Art. 28 of the GDPR.

1. Sources of personal data

The personal data to be processed are collected directly from you or from third parties who keep them by law (e.g. Public Registers, Chamber of Commerce) or from our 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 data obtained from sources other than the data subject

For the pursuit of the purposes described below, Valoridicarta processes the following categories of personal data-provided directly by you to Valoridicarta or to the Poligrafico:

- 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 you;
- b) payment details: information relating to payment due (e.g. IBAN);
- c) judicial data: data relating to criminal convictions and crimes or related security measures, provided by you to Valoridicarta, in compliance with the legislation in force on public procurement.

- obtained from third parties:

- a) personal and contact details: information found in the company/business registry identifying you;
- b) judicial data: data relating to criminal convictions and crimes or related security measures, in compliance with the legislation in force on public procurement.

(The aforementioned categories of personal data are hereinafter also jointly referred to as “personal data”).

3. Purpose of data processing

Personal data shall be processed for the following purposes:

- a) participation in tenders launched by Valoridicarta;
- b) performing possible pre-contractual negotiations and performing a contract to which you are party;
- c) administrative, commercial and logistical management of the ensuing supply relationship (e.g. bookkeeping, invoicing, payments);
- d) fulfilment of legal, regulatory and tax obligations in relation to the same contractual relationship or required by order of the Data Protection Authority;
- e) protection of the rights of Valoridicarta and the Poligrafico under the contract awarding procedures or under the contract (e.g. breach of contract, warnings, transactions);
- f) registration and archiving pursuant to Italian Presidential Decree 445/2000 and subsequent additions and amendments and to the regulations on consulting archive documents for historical purposes and the protection of confidentiality governed by Legislative Decree 42/2004 and subsequent additions and

amendments.

4. Legal basis and lawfulness of processing

For the purposes indicated in letters a), b) and c) of paragraph 3 of this Privacy Policy, the legal basis of the processing, which certifies its lawfulness, is that foreseen under Art. 6 (1) (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 undertaken for the purposes referred to in letters d) and f) of the same paragraph is based on legal obligations applicable to Valoridicarta (Article 6 (1) (c) of the GDPR).

For the purposes indicated 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 (Article 6 (1) (f) of the GDPR).

The processing of your judicial data shall be performed solely and exclusively within the limits imposed by the legislation in force on public procurement (pursuant to Article 80 of Legislative Decree 50/2016) and in compliance with Art. 10 of the GDPR and of Art. 2-octies of Legislative Decree 196/2003, as amended by Legislative Decree 101/2018 (hereinafter also “Privacy Code”), and under the control of public authority.

5. Provision of personal data and consequences of refusal

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

Refusal to provide compulsory data shall make it impossible to proceed with the purposes of processing described in this Privacy Policy (cf. par. 3).

6. 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, Valoridicarta uses a wide range of security measures in order to ensure and maintain the security, integrity and accessibility of Personal Data.

Valoridicarta 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, Valoridicarta has, with a separate written agreement, appointed Poligrafico Data Processor pursuant to Art. 28 of the GDPR.

7. Categories of recipients of Personal Data

Your personal data shall be processed by persons specifically and duly authorized by the Data Controller, pursuant to the GDPR and Art. 2-quaterdecies of the Privacy Code and they may also be disclosed to third parties - where necessary and in any case bound under contract with Valoridicarta - for the purposes of performing the contract/steps prior to the contract referred to in par. 3, belonging to the following categories:

- a) parent company Poligrafico, also pursuant to Recital 37 of the GDPR;
- b) financial administrations and public authorities that request it;
- c) Italian National Anti-Corruption Authority (ANAC) for the obligations under the legislation in force;
- d) banks and credit institutions authorized to arrange payments, even indicated by the same supplier;
- e) law firms;
- f) professional firms/companies/consultants providing accounting, fiscal and tax services;
- g) financial intermediaries for economic/financial obligations relating to the contractual relationship;
- h) companies that perform audits and certify financial statements;
- i) suppliers and managers of the Poligrafico's online e-procurement platform (e.g. System Manager), as sub-suppliers of Valoridicarta;
- j) IT maintenance companies for Poligrafico, as sub-suppliers of Valoridicarta.

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

All the persons belonging to the categories to which Personal Data may be disclosed shall use them in their capacity as ‘Data Processors’, duly appointed and instructed by Valoridicarta in its role as Data Controller, or as independent ‘Data Controllers’.

Personal data processed by Valoridicarta are not subject to dissemination, without prejudice to the obligations established by the legislation on administrative transparency (Article 1 (16) (b) and (32) of Italian Law No 190/2012; Legislative Decree 33/2012; Art. 29 of Legislative Decree 50/2016).

8.

9. Transfers outside the EU

Your personal data shall not be transferred to third countries outside the European Union.

10. Personal data retention period

Your personal data shall be retained at the registered address of Valoridicarta for the time necessary to perform the contract and in compliance with civil, fiscal and regulatory laws and in any case 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.

We also inform you that Valoridicarta is subject to the legislation on registration and archiving pursuant to Italian Presidential Decree 445/2000 and subsequent additions and amendments and to the regulations on consulting archive documents for historical purposes and the protection of confidentiality governed by Legislative Decree 42/2004 and subsequent additions and amendments.

11. 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 you or that, similarly, significantly affects you personally.

12. Rights of the data subject

Pursuant to and in accordance with the GDPR, you have the following rights, as Data Subject, that 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) right to restriction of processing, in the cases provided for by Article 18 GDPR;
- e) 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 by registered post with signed-for delivery to the Data Protection Officer (DPO) to the following address: Via Salaria, 691 - 00138 Rome, or by e-mail to the following e-mail addresses: privacy@ipzs.it or rpdp@pec.ipzs.it using the form available on the website of the Italian Data Protection Authority www.garanteprivacy.it.

In addition you can lodge a complaint to the Privacy Manager or other authorities within the meaning of Article 13 (2) (d) and Article 77 of the GDPR.

13. Changes to this Privacy Policy

This policy may be subject to modifications. We therefore recommend that you check regularly the privacy section of the homepage of the e-procurement platform and the Valoridicarta website, Privacy section, under “Information pursuant to Articles 13 and 14 of European Regulation 2016/679, Suppliers.”

Rome, 25 November 2019

signed by the Data Controller