

**PRIVACY POLICY FOR PERSONAL DATA  
PROVIDED BY THE SUPPLIERS THROUGH THE "VERONESI GROUP" PORTAL**

**Veronesi Holding S.p.A., with registered offices in Quinto di Valpantena (VR), Via Valpantena 18/g (Tax Identification Code 04729010019 - VAT Number 02429770239),** in the person of its *pro tempore* legal representative, as Data Controller ("**Controller**" or "**Veronesi Group**"), according to Article 13 of Regulation (EU) 2016/679 – General Data Protection Regulation ("**GDPR**") and Legislative Decree 196/2003, as modified by Legislative Decree 101/2018, hereby informs that the personal data provided during registration on the Portal [www.supplierarea.com](http://www.supplierarea.com), required to execute the contractual relationships with the Veronesi Group ("**Data**"), will be processed in compliance with the provisions contained in the GDPR, national and community regulations regarding the protection of personal data, relative provisions issued by competent authorities as well as the principles of correctness, lawfulness, transparency, and protection of privacy and related rights.

In particular:

**1. DATA CONTROLLER:** Veronesi Holding S.p.A., with registered offices in Quinto di Valpantena (VR), Via Valpantena 18/g (Tax code 04729010019 - VAT Number 02429770239), in the person of its *pro tempore* legal representative, which can be contacted at the following e-mail address: [privacy@gruppoveronesi.com](mailto:privacy@gruppoveronesi.com)

**2. TYPE OF DATA PROCESSED, PURPOSES, AND LEGAL BASIS:** the Data acquired through the Portal is collected and processed by the Data Controller exclusively for the following purposes:

- (a) Supplier database qualification and management;
- (b) participating in events and online tenders;
- (c) managing of pre-contractual and contractual Supplier relations;
- (d) performing administration, tax and accounting activities associated with the Supplier and the Veronesi Group, and meeting the Data Controller's legal obligations;
- (e) managing litigation (in or out of court).

The legal basis for the data processing is the performance of the supply contract, pre-contractual Supplier activities, and/or meeting legal obligations.

**3. PROCESSING METHOD:** the Data may be collected, recorded, organised, stored, viewed, processed, modified, compared, used, inter-connected, selected, extracted, blocked, disseminated, deleted, and destroyed.

The Data is collected after signing up to the Portal by filling out forms designed for the purposes, which may be included in contracts. The Data is processed using electronic or other automatic, computerised or online methods with appropriate passwords, as strictly necessary for the purposes indicated.

In particular, the Data is processed by the Data Controller's internal personnel (employees, collaborators, etc.), identified and authorized for processing according to the instructions that are issued in compliance with current legislation on data privacy and security, as well as by parties external to the Data Controller's company organisation who have been appointed for this purpose, where appropriate, and who are responsible for processing (pursuant to Article 28 of the GDPR).

The Data is collected and stored by the Controller in computerised and/or paper archives and are stored and controlled using methods ensuring security and confidentiality, in compliance with the data protection regulations mentioned above.

**4. PROVISION OF THE DATA:** the Data is provided for the purposes mentioned above in point 2. Therefore, partial or complete failure to provide the Data makes it impossible for the Veronesi Group to establish or continue the relationship with the Supplier.

**5. DATA RECIPIENTS OR ANY CATEGORIES OF RECIPIENTS:** the Data may be disseminated, within the limits strictly pertinent to the obligations, tasks, and purposes mentioned above and in compliance with the current legislation in this regard, to the following categories of subjects:

- (a) external physical and/or legal persons that provide services that are instrumental to the activities of the Data Controller for the purposes referred to in paragraph 2 above (e.g. call centres, suppliers, consultants, companies, institutions, professional offices, etc.);
- (b) other companies controlled by and/or connected to the Veronesi Group;
- (c) subjects/entities who receive this information in order to fulfil or to demand the fulfilment of specific obligations provided for by laws, regulations and/or Community legislation.

The data will not be published or used for entirely-automatized decision-making processes, including profiling.

**6. TRANSFERRING THE DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS:** as part of managing the relationship with the Veronesi Group, the data may be transferred to a country outside the EU and/or to international organisations. In these cases, the Data Controller will take all the appropriate measures to protect the security and confidentiality of the Data, in compliance with the privacy regulations in force.

**7. STORING THE DATA:** for the purposes set out in point 2, the Data will be processed and stored by the Data Controller for the time permitted by current accounting, tax, civil law and litigation regulations.

**8. RIGHTS OF THE DATA SUBJECT AND HOW TO EXERCISE THEM:** in relation to the processing described in this information statement, the data subject may exercise the following rights:

- to access, rectification, cancellation, limitation and opposition to the processing of Data;
- to receive the Data in a structured format, commonly used and readable by an automatic device, to transmit it to another data controller;
- to lodge a complaint with the Data Protection Authority.

To exercise these rights, contact the Controller at the contact details indicated in point 1 above.

**Veronesi Holding S.p.A.**