	<b>PRIVACY GDPR ORGANIZATIONAL MODEL</b>	
	<b>INFORMATION ON THE PROCESSING OF PERSONAL DATA "CUSTOMERS / SUPPLIERS" EX ART. 13 GDPR</b>	Page 1 of 4 Date 01/03/22 Revision 02

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

### FOR CUSTOMERS AND SUPPLIERS

pursuant to Art. 13 del Regulation (UE) 2016/679 of the European Parliament and of the Council of 27<sup>th</sup> April 2016

Pursuant to Art. 13 of the General Data Protection Regulation – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27<sup>th</sup> April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as "GDPR"), we hereby provide you with information regarding the exercise of your rights relating the personal data provided to allow the relationship with Nateeo S.r.l.

<b>Data Controller</b>
The Data Controller is <b>Nateeo S.r.l.</b> , with registered office in Camisano Vicentino (VI) Via dell’Innovazione n. 1 - Italy - tax code and registration number with the Register of Companies of Vicenza: 03804370249 (hereinafter " <b>Controller</b> " or " <b>Company</b> ").
<b>Data Protection Officer (hereinafter referred to as "DPO")</b>
The Controller shall make use of the Group’s DPO appointed pursuant to Article 37(2) of the GDPR. The DPO's contact details can be found on the Controller's website or at the Controller's registered office. To exercise your rights and for any communication, problem and/or request for clarification regarding the protection of your personal data, you may freely contact the DPO

#### **Mandatory purposes for which the processing does not require your consent**

<b>Purpose</b>	<b>Legal basis of the processing</b>
Managing the execution of pre-contractual measures, as well as the execution and fulfilment of the contractual obligations assumed by each other.	(Art. 6, paragraph 1, point (b), GDPR) Performance of a contract
Administrative, accounting and tax compliance; statistics; litigation management and credit protection.	(Art. 6, paragraph 1, point (b), GDPR) Performance of a contract (Art. 6, paragraph 1, point (c), GDPR) Processing necessary to fulfil a legal obligation to which the Controller is subject (Art. 6, paragraph 1, point (f), GDPR) Processing necessary for the pursuit of the legitimate interest of the Controller in relation to the organisational, administrative, financial and accounting management of its organisation
Sales and direct marketing activities through the transmission to the e-mail addresses provided by you of communications concerning the sale of products and / or services similar to those already provided, unless you expressly refuse such use, initially or later.	(Art. 6, paragraph 1, point (f), GDPR) Processing necessary for the pursuit of the legitimate interest of the Controller related to the organizational and commercial management of its organization
Managing the storage and retention of data, information, communications, including electronic and documents relating to the relationship with the Company.	(Art. 6, paragraph 1, letter c), GDPR) Processing necessary to fulfil a legal obligation to which the Controller is subject

**Recipients of personal data**

For the pursuit of the purposes indicated above, your personal data may be communicated to:


- employees and/or collaborators of the Data Controller, duly appointed as authorised and trained subjects on the methods of processing such data;
- other companies of the 'Cereal Docks' Group for performing and managing specific functions and/or services;
- third parties other than the Controller, such as:

Third parties or categories	Purpose	Notes
Computer companies	Management, maintenance, updating of systems and software used by the Controller and video surveillance systems	
Providers of networks, electronic communication services and computer and telematic services for the storage and management of computer data	Hosting, housing, Cloud, SaaS and other remote IT services essential for the provision of the activities of the Controller; filing and storage services in accordance with electronic documents	Cloud Services may involve data processing in non-EU countries, which guarantee appropriate confidentiality rights.
Consultants, professionals, law firms, arbitrators, insurance companies, experts, brokers; other providers of services related to the activity of clients/suppliers	Judicial, extra-judicial and accident insurance activities Organisational, administrative, financial and accounting management	
Banks or institutions, companies and entities of any type that carry out banking, credit, leasing, factoring, financial activities - including intermediation - and related, complementary or similar activities	Organisational, administrative and financial management	
Public Administrations and Public Bodies in general	Management of requests by control bodies Management of procedures for access to grants, aids and/or premiums provided for by current legislation for the agricultural sector	
Public Safety Authority and Judicial Authority	Management of investigations by the investigating bodies in the event of accidents	

The companies of the Cereal Docks Group and third parties to whom your personal data may be disclosed act as:

- data controllers, i.e. subjects who determine the purposes and means of the processing of personal data;
- data processors, i.e. subjects who process personal data on behalf of the Data Controller;
- joint controllers of the treatment that determine jointly with the Company the purposes and means of the same.

The list and the updated information of the subjects identified as controllers, processors or joint controllers is available at the Company.

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**Period of retention of personal data**

We explain below the period of retention of personal data or, if this is not possible, the criteria used to determine this period.

Personal data and documents	Retention period or criteria for determining it
Personal data and documents relating to the contractual relationship	For the duration necessary to pursue the purposes of the processing and also subsequently, within the limits granted by law, for administrative, accounting and tax purposes, as well as to assert or protect the rights of the Controller, where necessary

**Rights of the data subject**

We inform you of the existence of certain rights provided by the GDPR with regard to personal data and the processing thereof that you may request from the Controller.

Right	Description	How to make it effective
Right of access to data (art. 15)	You may request: (a) the purposes of the processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular where they are recipients from third countries or international organisations; (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (e) the existence of the right of the data subject to request the Controller to correct or erase the personal data or to restrict the processing of personal data concerning him or to object to their processing; (f) the right to lodge a complaint; (g) all available information on the origin of data, when they are not collected from the data subject; (h) the existence of an automated decision-making process, including profiling as referred to in Article 22(1) and (4), and, at least in such cases, relevant information on the logic used and the importance of and the anticipated consequences of such processing for the data subject. You have the right to request a copy of the personal data being processed.	Forms on the website or available from the Controller
Right of rectification (art. 16)	You have the right to request the rectification of inaccurate personal data concerning you and to obtain the integration of incomplete personal data	Forms on the website or available from the Controller
Right to be forgotten (art. 17)	You have the right to obtain from the Controller the erasure of personal data concerning you if the personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed	Forms on the website or available from the Controller
Right to restriction of treatment (art. 18)	You have the right to obtain from the data Controller the restriction of the processing when you have complained about the accuracy of the personal data (for the period necessary for the data Controller to verify the accuracy of such personal data) or when the processing is unlawful, but you oppose the erasure of personal data and instead request that they be restricted in their use or when the data are necessary for the establishment, exercise or defense of a right in court, while the Controller does not need them anymore.	Forms on the website or available from the Controller

Right to data portability (art. 20)	You have the right to receive in a structured format, commonly used and machine-readable, the personal data that you provide us with and you have the right to transmit them to another Controller if the processing: (i) was based on consent, (ii) was based on contract and (iii) and if the processing is carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority and such transmission does not infringe the rights of a third party.	Forms on the website or available from the Controller
Right to object (art. 21)	You have the right at any time to object, in whole or in part, to the processing of your personal data if the processing is carried out for the pursuit of a legitimate interest of the Controller or if the processing is carried out for direct marketing purposes. In this case, the personal data will no longer be processed for these purposes.	Forms on the website or available from the Controller
Right to lodge a complaint with a supervisory authority (art. 77)	You have the right to complain to the Control Authority if you consider that the processing of your data is in breach of the GDPR	

The exercise of these rights is subject to the limits, rules and procedures laid down by the GDPR. The data subject must know them and implement them. Furthermore, in accordance with the provisions of article 12, paragraph 3, the Controller shall provide the data subject with information relating to the action taken without undue delay and, in any event, no later than one month after receipt of the request. This period may be extended by two further months, if necessary, taking into account the complexity and number of the requests. The Controller shall inform the data subject of such extension, and of the reasons for the delay, within one month of receipt of the request.

**Changes and updates**

This information may be subject to change and/or addition, including as a result of the applicability of the GDPR and any future changes and/or regulatory updates.

The updated information is constantly available on the website of the Controller.

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The personal data provided may be processed by the Data Controller with or without by computer tools.

We also inform you that the communication of your personal data for the mandatory purposes indicated is a legal or contractual obligation or a necessary requirement for the performance of contractual obligations, so you have the obligation to provide personal data, because otherwise you will not be able to manage the relationship with the Company.