









**INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA RELATED TO
CONTRACTS WITH CUSTOMERS
PURSUANT TO ART. 13 AND 14 OF EU REGULATION 2016/679 ("GDPR")**

	DATA CONTROLLER	Company name: Each company (<i>IdB Holding SpA, Indena SpA, Bennett Srl, Indena SaS</i>), part of the corporate Group IdB Holding, as Data Controller. The Data Controller can be reached at the e-mail address: privacy@idbholding.com ("Company")
	DATA PROTECTION OFFICER (DPO)	The Data Protection Officer of each company of the group (IDB Holding S.p.A.) is Partners4Innovation S.r.l., Via Copernico 35, 20125 Milano (tel. 02/92852779), and can be reached at the e-mail address: dpo@idbholding.com

	PERSONAL DATA PROCESSED
	"Data" means those relating to natural persons processed by the Company for the stipulation and the execution of the contractual relationships with its customers that are legal entities (Customer), such as those of the legal representative who signs the contract in the name and on behalf of the Customer, as well as Customer's employees/consultants involved in the activities referred to in the contract. In the latter case the Customer will be the source of the data.

	DATA PROCESSING PURPOSES		LEGAL BASIS FOR PROCESSING DATA		DATA RETENTION PERIOD
	Purposes related to establishing and executing the contractual relationship between the Customer and the Company.		Execution of the contract with regard to data on legal representatives. Legitimate interest with regard to data on Customer employees/consultants involved in contract activities.		Duration of the contract and after its completion, for the ordinary limitation period of 10 years. For the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies.
	To fulfill administration/accounting requirements, such as accounts and treasury management, invoicing (e.g. logging and checking invoices) in accordance with legislation.		Requirement to meet the Company's legal obligations.		
	Out-of-court debt recovery		Legitimate interest (recovering due receivables)		
	If necessary, to ascertain, exercise and/or safeguard Controller rights in judicial and/or extrajudicial proceedings.		Legitimate interest (legal protection)		
	Direct Marketing activities: sending - through automated means of contact (such as e-mail, SMS or MMS) and conventional means (such as traditional mail and telephone calls with operators)-promotional and commercial communications relating to services/products offered by the Company or to Company events, as well as carrying out customer satisfaction surveys, market researches and statistical analyses.		Consent of Customer legal representative (which is optional and can be withdrawn at any time).		Personal details of the data subjects will be processed until consent is withdrawn. Data relating to marketing activities will be processed for 24 months.

Once the aforementioned retention period has expired the data will be destroyed or made anonymous compatibly with technical erasure and backup procedures and with the accountability requirements of the Data Controller.

	<p>DATA PROVISION</p> <p>The provision of Data is necessary for the conclusion and/or execution of the contract. The refusal to provide the Data therefore means that it will not be possible to establish the contractual relationship and/or to fulfil the resulting contractual obligations.</p> <p>The provision of data for marketing purposes is entirely optional: these activities will be carried out only with your express and unequivocal consent, without prejudice to your right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before such withdrawal.</p>
	<p>DATA RECIPIENTS</p> <p>Data may be communicated to external parties operating as data controllers, for example supervisory bodies and authorities and public or private parties in general authorised to request data.</p> <p>Data may be processed on behalf of the data controller by external parties appointed as data processors (according to art. 28 of the GDPR) carrying out specific activities for the controller, such as dealing with accounting, tax and insurance requirements, sending correspondence, managing takings and payments etc.</p>
	<p>PARTIES AUTHORISED TO PROCESS DATA</p> <p>Data may be processed by employees and/or collaborators of the Data Controller/Data Processor who have received adequate operating instructions and who have been expressly authorized to process it by the Data Controller/Data Processor.</p>
	<p>PERSONAL DATA TRANSFERS OUTSIDE THE EU</p> <p>The data may be transferred to non-European countries in accordance with the provisions of Articles 45 and 46 of the GDPR.</p>
	<p>DATA SUBJECTS' RIGHTS- COMPLAINT TO THE SUPERVISORY BODY</p> <p>By contacting the Data Protection Committee via e-mail to the address privacy@idbholding.com, data subjects can ask the Company for access to their personal data, their rectification, their cancellation, the restriction of the processing in the cases provided for by art. 18 GDPR, as well as the opposition to the processing, for reasons related to their particular situation, in the hypothesis of legitimate interest of the Data Controller.</p> <p>Furthermore, in the event that the processing is based on consent or contract and is carried out with automated means, data subjects have the right to receive the data in a structured, commonly used, machine-readable format and, if technically feasible, to transmit them to another data controller without hindrance ("right to data portability").</p> <p>The data subjects have the right to withdraw the consent given at any time for marketing purposes. The possibility for the data subject who prefers to be contacted exclusively through traditional methods, to oppose the processing for marketing purposes only in relation to the receipt of communications through automated means, remains unchanged.</p> <p>Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or where they work, or the member state where the alleged breach took place.</p>