






**INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA RELATED TO  
CONTRACTS WITH SUPPLIERS  
IN ACCORDANCE WITH EU REGULATION 2016/679 ("GDPR")**

	<b>DATA CONTROLLER</b>	<b>Company name:</b> 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: <a href="mailto:privacy@idbholding.com">privacy@idbholding.com</a> ("Company")
	<b>DATA PROTECTION OFFICER (DPO)</b>	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: <a href="mailto:dpo@idbholding.com">dpo@idbholding.com</a>

	<b>PERSONAL DATA PROCESSED</b> The term " <b>Data</b> " includes data on natural persons processed by the Company for the stipulation and execution of the contractual relationships with its suppliers, such as those of the legal representative of the supplier who signs the contract in the name and on behalf of the latter, as well as the supplier's employees/consultants involved in activities referred to in the contract. In the latter case the supplier itself will be the source of the data.
---	---

	<b>DATA PROCESSING PURPOSES</b>		<b>LEGAL BASIS FOR PROCESSING DATA</b>		<b>DATA RETENTION PERIOD</b>
	Purposes related to establishing and executing the contractual relationship between the Supplier and the Company.		Execution of the contract with regard to data on Supplier legal representatives.  Legitimate interest with regard to data on supplier employees/consultants involved in the contract activities.		Duration of the contract and after completion, for the statutory prescription period of 10 years  For the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies.
	Fulfillment of administrative-accounting requirements, such as accountancy and treasury management, as well as invoicing (e.g. logging and checking invoices) in accordance with the requirements of current regulations.		Requirement to meet the Company's legal obligations.		
	If necessary to ascertain, exercise and/or safeguard Company rights in legal proceedings.		Legitimate interest (legal protection)		
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.					

	<b>DATA PROVISION</b> 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.
---	---



#### DATA RECIPIENTS

Data may be communicated to parties operating as **data controllers**, such as supervisory bodies and authorities, and private or public organisations in general authorised to request data.

The data may be processed, on behalf of the data controller, by other companies belonging to the Group and by external parties designated as **data processors** (according to art. 28 of the GDPR), who carry out specific activities on behalf of the data controller (for example, accounting, tax and insurance obligations, shipment of correspondence, management of collections and payments, etc.).



#### PARTIES AUTHORISED TO PROCESS DATA

Data may be processed by employees and/or collaborators of the Data Controller/Data Processor who have been expressly authorised to process the Data and have received suitable operating instructions.



#### PERSONAL DATA TRANSFERS OUTSIDE THE EU

The data may be transferred abroad to non-European countries in accordance with the provisions of Articles 45 and 46 of the GDPR..



#### DATA SUBJECTS' RIGHTS - COMPLAINT TO THE SUPERVISORY BODY

By contacting the Data Protection Committee via e-mail to the address [privacy@idbholding.com](mailto: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.

Furthermore, in the case where processing is based on consent or contract and carried out with automated tools, data subjects have the right to receive the personal data in a structured, commonly used and machine-readable format, and to transmit the data to another data controller without obstruction.

Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or work, or the member state where the alleged breach took place.