# Riva Forni Elettrici
# Privacy Information
# SUPPLIERS



## PRIVACY INFORMATION IN ACCORDANCE WITH ART. 13 AND 14 EU REGULATION NO 679/2016

Dear Supplier/Professional,

Riva Forni Elettrici S.p.a. with registered office in Milan, Viale Certosa 249, as Data Controller pursuant to EU Regulation 679/2016 applicable from 25 May 2018 - General Regulation on Data Protection ("GDPR") and pursuant to Legislative Decree no. 196/2003 - Personal Data Protection Code ("Privacy Code") as amended by Legislative Decree 101/18 (hereinafter the Privacy Code and GDPR are collectively referred to as "Applicable Law") recognizes the importance of protecting Personal Data and considers their protection one of the main objectives of its activities.

In accordance with the Applicable Law, we provide you with the necessary information regarding the processing of the Personal Data you provide. This information is provided in accordance with art. 13 and 14 of GDPR and Riva Forni Elettrici S.p.a. invites you to read it carefully as it contains important information on the protection of Personal Data and on the security measures adopted to guarantee their confidentiality in full compliance with the Applicable Law.

Riva Forni Elettrici S.p.a. informs that the processing of Personal Data will be based on the principles of lawfulness, correctness, transparency, limitation of purposes and storage, adequacy, minimization of data, accuracy, integrity and confidentiality. Personal Data will therefore be processed in accordance with the legal provisions of the Applicable Law and the confidentiality obligations provided for therein.

In view of the above, we inform you in accordance with articles 6, 7, 9, 13 and 14 of the GDPR:

### 1. PERSONAL DATA SUBJECT TO PROCESSING

In the context of the execution of the contractual relationship between the Parties, the Data Controller may process the following categories of data:

- Personal Data biographical, identification and contact data of employees working in your organization or natural persons who represent you;

- Personal Data relating to Criminal Convictions and Offences, in the context of the processing of economic data accessible by anyone (publicly accessible registers and documents, such as chamber of commerce registration details and public registers), judicial data relating to criminal proceedings.

- Contribution/paid data – information necessary to verify the regular execution of the legal obligations of your Employer, which can be obtained, by way of example and not exhaustively, from the following documentation:

  - Libro Unico del Lavoro (L.U.L.);
  - training in the field of safety at work pursuant to Legislative Decree n. 81/08
  - Single Document of Contribution Regularity (D.U.R.C.);
  - list of personnel employed in the execution of the contract;
  - copy of the communications sent to the relevant bodies relating to the recruitment of workers employed in the execution of the contract (Unilav)

- Special personal data relating to health with reference to legal obligations relating to health, hygiene and safety at work and in the field of procurement and joint liability.

## 2. PURPOSE, LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF THE PROCESSING

The processing to which your Personal Data will be subjected has the following purposes:

a) Administrative-accounting, operative-organizational. For the purposes of applying the provisions on the protection of Personal Data, the processing operations carried out for administrative-accounting purposes are those related to the performance of activities of an organisational, administrative, financial and accounting nature, regardless of the nature of the data processed. In particular, these purposes are pursued by internal organizational activities, those functional to the fulfilment of contractual and pre-contractual obligations, the management of the contractual relationship in all its phases, the keeping of accounts and the application of tax-related regulations and legal obligations.

b) Commercial. For the purposes of applying the provisions on the protection of personal data, the processing carried out for commercial purposes is related to the development of new business contacts.

c) Safety and asset protection. For the purposes of registering the accesses to the buildings owned by Riva Forni Elettrici S.p.a. in order to guarantee the subjects and workers' physical safety, also in compliance with the provisions of D.lgs no. 81/2008, as well as to protect the company's assets by preventing theft or damage. Your personal data will also be processed as a result of the installation and use of a video surveillance system located in the company. These systems involve the processing of personal data for the purposes of physical security of workers and third parties, verification of the functionality and efficiency of the systems, protection of company property and assets, to prevent theft and damage and in order to facilitate and/or allow, in civil or criminal proceedings, the possible exercise of the right of defense, o the initiation of disciplinary procedures against staff, on the basis of images useful in the event of unlawful acts/crimes. In this regard, for more information, please refer to the specific "Visitor Information" available at the Data Controller's Offices.

d) Management of procurement contracts. The personal data collected will be processed for the following specific purposes:

- verification of the regularity of contributions, remuneration and obligations in the field of safety at work;
- verification of the correct work and compliance with company procedures and policies by external personnel;
- defence of rights in the course of judicial, administrative or extrajudicial proceedings, and in the context of disputes arising in relation to the contract in place between the Company and your Employer;
- purposes related to the obligations provided for by laws, regulations or EU legislation, by provisions/requests of authorities legitimated to do so by law and/or by supervisory and control bodies.

The legal basis of the treatment referred to purpose a) and b) is the execution of the contract, of pre-contractual measures in place, as well as the need for Riva Forni Elettrici S.p.a. to conduct all the various administrative, commercial, accounting and fiscal activities, as well as operational and organizational, deriving from this relationship and necessary to fulfil the legal obligations.

The legal basis of the treatment referred to purpose c) is the legitimate interest of the Data Controller.

The processing of personal data for the purposes referred to in point d) is based on legal obligations to which the Data Controller is subject and on its legitimate interest for protection and defence purposes.

Concerning the data that we are required to know in order to fulfil the obligations arising from existing contracts, and the obligations under laws, regulations, European legislation, or provisions issued by the authorities entitled to do so by law and by supervisory and control bodies, failure to provide them will make it impossible to establish or continue the relationship, to the extent that such data are necessary for the execution of the same.

The Data Controller also informs that the possible non-communication, or incorrect communication, of one of the obligatory information, leads to the following consequences:

- the impossibility of the Data Controller to guarantee the adequacy of the treatment itself to the contractual agreements for which it is performed;
- the possible mismatch between the results of the treatment itself and the obligations imposed by fiscal, administrative and civil law to which it is addressed.

## 3. TREATMENT METHODS

The processing may be carried out manually or with the aid of electronic or automated systems, will take place at the aforementioned headquarters of the Data Controller, at the operating offices or at third parties identified and will include, in compliance with the limits and conditions set forth in art. 5 and 25 of the GDPR, all the operations provided for in art. 4, paragraph 1, no. 2) of the GDPR (collection, registration, processing,

etc..), necessary for the processing in question, including the communication to the parties referred to in the next point.

## 4. SCOPE OF COMMUNICATION AND DISSEMINATION AND TARGET AUDIENCES

The data being processed will not be disclosed, unless explicitly authorized by the person concerned after proper information. Without prejudice to communications made in compliance with legal obligations to competent authorities, the data may be communicated to companies contractually linked to the Data Controller. The data may be communicated to third parties belonging to the following categories:

- service providers used by the Data Controller for the management of the information system and telecommunications networks, and to take care of the maintenance of IT systems (including e-mail);
- subjects who provide services for the administrative-accounting management of the Data Controller
- professionals, studios or companies in the context of assistance, consultancy or collaboration relationships;
- supervisory companies;
- auditors and people checking and certifying the activities carried out by the Data Controller.

The identification data processed in application of the corporate security procedures are not subject to communication, except for explicit and specific requests that may be made by the competent judicial and investigative authorities.

The subjects belonging to the above-mentioned categories act as Data Processors or operate in total autonomy as separate Data Controllers. The list of Data Processors is constantly updated and available on request at the headquarters of the Data Controller.

Moreover, in the course of ordinary processing activities, the subjects expressly designated by the undersigned as being in charge of processing, authorised according to their respective profiles, may have access to personal and identification data and therefore become aware of them.

## 5. PERSONAL DATA TRANSFER OUTSIDE THE EU

The Data Controller does not directly carry out any data transfer outside the European Union. However, by using cloud services, chosen since it guarantees adequate and appropriate security measures to protect personal data, a transfer of data outside the EEA is possible due to technical and maintenance reasons, by means of the following guarantees, ensured by the supplier:

- Transfer of data to countries deemed to be adequate by the EU Commission.
- Subscription of Standard Contractual Clauses for the transfer of data outside the EU, as defined by the EU Commission, in order to guarantee a safe and legitimate transfer and subsequent processing of data outside the EU.

## 6. DATA RETENTION

The processing of the Personal Data in question and their storage will have a duration coinciding with the time

necessary for the exhaustion of the purposes indicated in this statement including compliance with rules and regulations, in any case no later than 10 years. Beyond this term, Riva Forni Elettrici S.p.A. reserves the right to store and process your Personal Data for the sole purpose of ascertaining, exercising or defending a right in court.

The processing and storage of the personal data of potential Suppliers for the purpose of developing new business contacts will have a duration coinciding with the time necessary to exhaust the purposes indicated in this policy and in any case up to 12 months from the collection of the data.

As regards to salary data, including severance pay, social security and insurance data, their processing and storage will have a duration coinciding with the time necessary to complete the purposes indicated in this information and in any case up to 2 years from the end of the contractual relationship.

## 7. RIGHT OF ACCESS TO PERSONAL DATA AND OTHER RIGHTS

Pursuant to the GDPR, data subjects have the right to ask the Data Controller for access to personal data (art. 15), rectification (art. 16), erasure of the same or oblivion (art. 17) in cases where the Data Controller no longer has any legal basis for processing, the limitation of the processing of personal data concerning him within the limits provided for by current legislation (art. 18), the right to data portability (Art. 20) or to object to their processing (Art. 21), as well as the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or which similarly significantly affects him or her (Art. 22). If the processing of personal data is based on the express consent of the data subject, pursuant to art. 7 paragraph 3 of the Regulation, the subject has the possibility to revoke his or her consent at any time.

The exercise of the rights listed above is free of charge and is not subject to formal constraints and can therefore be exercised using the contact details made available by the Data Controller. In the event that the Data Subject exercises any of his rights, it will be the responsibility of the Data Controller to verify that he or she is entitled to exercise them and to give feedback, as a rule, within one month.

The data subject also has the right to lodge a complaint with the Data Protection Authority, using the references available on the www.garanteprivacy.it website, or to take legal action (Article 77 of the Regulation) if he/she considers that the processing carried out by the Data Controller does not comply with current legislation on the protection of personal data.

## 8. DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller is the company Riva Forni Elettrici S.p.a. with registered office in Milan Viale Certosa 249, tel. 02307001, e-mail address privacyitalia.rfe@rivagroup.com. In turn, Riva Forni Elettrici S.p.a. has appointed GetSolution di Paola Generali, with registered office in Via Fabio Filzi, 23 20124 Milan, tel. +39 02 39661701 e-mail address dpo-grupporiva@getsolution.it, as Data Protection Officer (DPO), available for any information regarding the processing of Personal Data carried out by the Data Controller.

## 9. UPDATES

This policy is updated to March 2026; the Data Controller reserves the right to update it according to any changes to the assumptions on which the current version is based.

THE DATA CONTROLLER
**RIVA FORNI ELETTRICI S.P.A.**

**Riva Forni Elettrici S.p.A.**
**nom. cap. Euros 210.600.000,00 fully paid**

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