

**PRIVACY POLICY IN COMPLIANCE WITH EUROPEAN GENERAL DATA PROTECTION REGULATION NO.  
2016/679 (“GDPR”) – REVIEWED ON OCTOBER 11, 2023**

Dear Supplier, with reference to personal data you advised, we hereby release following information:

**DATA CONTROLLER**

Data controller is Gerolamo Scorza S.p.A. (TVA no. 02892360104) address: Via Isolagiugno, 33 – 16013 Campo Ligure (Genoa, Italy), Ph. (+39)010/9218201, e-mail address: gerolamoscorza@gerolamoscorza.it (herein after called Scorza) that you may contact through aforesaid address or by email at [privacy@gerolamoscorza.it](mailto:privacy@gerolamoscorza.it)  
Scorza is part of the holding Genova Industrie Navali S.p.A. - address: Via dei Pescatori Molo Cagni -16128 Genoa - Italy, which has appointed a Data Protection Officer who can be contacted by email at [dpo.ginholding@privacyinchiario.it](mailto:dpo.ginholding@privacyinchiario.it)

**PERSONAL DATA SOURCES AND CATEGORIES**

Personal data being processed are those advised in the framework of commercial relationship. Besides contact information (name, surname, phone number, business e-mail address) fiscal and payment data, as well as judicial information and financial data could be processed. Furthermore, whether you are appointed for subcontracting activities, you will be expected to advise employees’ personal data, in compliance with law provisions. It will be your responsibility to give concerned employees a relevant privacy policy for proper information.

**PURPOSE AND LEGAL BASIS OF DATA PROCESSING**

Scorza processes your data for following purposes and in compliance with legal basis advised in EU GDPR 679/2016 and Legislative Decree no. 196/2003 (Privacy Code).

- a) To give support for the service supply to clients (GDPR, Art. 6, Par. 1, Lett. B) and for the relevant submission of information, request of quotation or required service supply.
- b) In accordance with applicable law provisions for data controller (GDPR, Art. 6, Par 1, Lett. c), including but not limited, the fulfilment of Scorza’s fiscal obligations.
- c) For the pursuance of Data Controller’s legitimate interest (GDPR, Art. 6, Par. 1, letter f). Including, but not limited:
  - I. schedule of activities.
  - II. countering fraud.
  - III. replying to specific requests from competent authorities.
  - IV. company rights protection in judicial and extrajudicial proceedings.
  - V. protection/treatment concerning company’s incidents.

Scorza does not collect any of your personal data for the purpose of making automated decisions.

**MANDATORY NATURE OF DATA DISCLOSURE**

Any missing, partial and/or non-compliant disclosure of data required for above-specified purposes may hinder commercial relationship between Scorza and you/your employer.

**DATA PROCESSING LOCATION AND METHOD**

Your data are treated in EU countries or in countries compliant with GDPR provisions. Due to contractual needs, your data could also be transferred to extra-EU countries, but in this case, they will be properly minimised and compliant measures will be taken to ensure data protection. All the relevant operations – including filing, working, processing, printing, storing, editing, updating – could be carried out by paper or through electronic tools.

**DATA DISCLOSURE TO THIRD PARTIES**

Your data, which could be processed by paper or electronic tools, won’t be circulated, but could be transferred to competent Authorities for administrative and institutional purposes, in accordance with current law provisions. More in detail, personal data could be advised to third parties belonging to following categories:

- Stakeholders or other companies belonging to the Holding.
- IT systems management companies.
- Advisors, self-employed persons, financial institutions and banks, lawyers etc.
- Customers working as frontend to ensure the best possible service.
- External parties appointed for management and maintenance of IT systems also on cloud and on the company’s technical equipment.
- Advisors for fiscal matters.
- Judicial and/or Public Security Authorities whereas expressly provided for law.

These subjects will collect only those data which might be required for service supply. Concerned parties, if foreseen, will be appointed as Data Processors in accordance with Art. 28 of GDPR. List of Data Processors will be available upon request.

Personal data could be processed by Scorza's authorized personnel, duly trained and sensitized to privacy specific theme, to data confidentiality and safeguarding the dignity of interested parties.

Scorza does not perform any activity related to suppliers' profiling.

#### **DATA RETENTION PERIOD**

Data collected for purposes described at points a) and b) will be retained in compliance with law provisions and, in any case, for not more than 10 years from the financial year in which the latest business contact was held, notwithstanding any different law provision.

In the event of legal protection of data controller, with reference to purposes described at point c), collected data might be processed until the accrual of prescription.

#### **YOUR RIGHTS**

It is your right to request and receive, in any moment, information and/or rectification upon your personal data processed by Scorza. If applicable, it is your right to request data cancellation or processing restriction and to receive relevant personal data in structured format, for common use and reading. You can address any request regarding your rights directly to Gerolamo Scorza by e-mail at [privacy@gerolamoscorza.it](mailto:privacy@gerolamoscorza.it)

It is also your right to object to your data processing, in compliance with Art. 21 of GDPR, or to file a complaint to Privacy Authority in accordance with Art. 77 of GDPR.

#### **REVIEWS**

Scorza reserves the right to review this policy, to then circulate and keep into account the latest release –

**REVIEWED IN OCTOBER 2023**