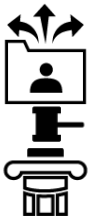
INFORMATION ON PRIVACY POLICY (art. 13 and 14 EU Reg. 2016/679 - "GDPR")	SUPPLIERS

Overview	Privacy Legislation (in particular EU Regulation 2016/679, the "General Data Protection Regulation" - known by its acronym "GDPR"), to which we are constantly committed, requires us to provide Data Subjects with information on the Processing of Data. The "Processing of Personal Data", in simple terms, is any operation concerning any "information relating to an identified or identifiable natural person". For example, an e-mail address referring to a person (e.g. mario.rossi@nomeadominio.it) is considered "Personal Data", and the act of collecting and registering it with us is considered "Processing". For the purposes of the Privacy Law, our organization is a "Data Controller", because it determines how and for what purposes we process Personal Data. The natural persons to whom the Personal Data relate are referred to as "Data Subjects".
	**Data Controller**
	Unoaerre Industries S.p.A., San Zeno Strada E, n.5 – 52100 Arezzo (AR) – Italy- VAT n. and fiscal code 02039680513 - e-mail : info@unoaerre.it
	**To which categories of people is this document addressed?**
	To suppliers of goods and services. The persons in question may be: a) representatives or contact persons of legal entities (if the applicant is a legal person, company or entity).
	**What personal data are processed?**
	To the minimum extent required for the achievement of each of the Purposes listed below, common data (first name, surname, e-mail address, company role, economic and financial situation) are processed
	**What is the origin of the personal data?**
	The data will be collected from you through the documents you will be asked to provide in order to establish and manage the contractual relationship.
	**For what purpose does the Controller process the data (*purpose*), and what authorizes him to process them (*legal basis*)?**
	Personal Data is processed to pursue the following purposes, and on the basis of the legitimacy prerequisites ('legal bases') indicated for each: **A) PRIMARY**: 1. To establish and manage the contractual relationship (art. 6 § 1.b GDPR) and in particular: a) To obtain information concerning the supplier's solvency, aimed at its qualification; b) For monitoring the proper performance of the contract, and of all obligations arising therefrom, by the supplier; c) For audits relating to the standards of the Code of Practice of the Responsible Jewellery Council and any other International Associations operating in the field of good industrial practice. To this end, the supplier undertakes to collect from its own employees and collaborators, from the employees and collaborators of any sub-contractor used, and from any other natural person with whom the supplier has relations for the performance of this contract, their consent to process their data for the consequent verifications. 2. to fulfil legal obligations, based on the need to pursue the purpose (Art. 6 § 1.c and 9 § 2.b GDPR); 3. to ascertain, exercise or defend a right in or out of court, on the basis of the need to pursue this purpose (Art. 6 § 1.f and 9 § 2.f GDPR)

	4. to conduct aggregate statistical analysis on anonymized information, based on the legitimate interest of the Data Controller (Art. 6 § 1.f GDPR).
	**Recipient Categories**
	Personal data will be processed within Unoaerre Industries S.p.A. by the subjects authorized by the Data Controller and may be communicated to third parties entrusted with specific processing activities (e.g. accountants, health professionals bound by a collaboration contract with the association, etc.) with whom the agreements on data processing provided for by art. 28 GDPR have been stipulated. It is specified that all of the aforementioned subjects, when not legally obliged to confidentiality, have signed a confidentiality agreement regarding the data they learn about for the office they are in charge of. The list of external subjects used by Unoaerre Industries S.p.A. (so-called External Data Processors) is available upon request of the interested party, at the head office of the Data Controller itself. Data may also be communicated to: ● banks or credit institutions to carry out the required administrative procedures ● Public bodies on the basis of legal regulations obliging the Data Controller to communicate the data; ● companies belonging to the group.
	**Is data transferred outside the European Union?**
	The Data Controller uses certain IT services of companies established outside the European Economic Area (e.g. United States; in this case the transfer is made on the basis of standard contractual clauses and additional measures to guarantee data protection). References to the guarantees and the means to obtain information on them are available by writing to the Data Controller at the addresses indicated in this notice. Furthermore, the use of some social communication platforms involves the transfer of personal data outside the European Economic Area. In general, we ensure that data transfers take place only to countries that guarantee an adequate level of protection, for which there is an adequacy decision by the European Commission, or on the basis of one of the other guarantees provided for in Chapter V of the GDPR.
	**How long will the data be stored?**
	Data, the retention of which is required by law, will be kept for the period prescribed by law. Historical data will be kept for the life of the Company. This is subject to the needs of ascertaining, exercising or defending a right of the Data Controller that require personal data to be kept for a longer period, or allow it to be kept to protect the rights and/or legitimate interests of the Data Controller and/or third parties. Data collected for ancillary purposes will be processed until consent is revoked. The aforementioned storage periods cannot be determined in relation to dissemination on media beyond the Controller's knowledge.
	**Is the data subject obliged to provide the data? What happens if he/she does not provide them?**
	Failure to provide the data does not allow the contractual relationship to be established or continued.
	**Are automated decision-making processes and/or profiling activities performed?**
	No decisions are made solely on the basis of automated data processing or profiling activities are done.
	**What rights does the data subject have?**
	The data subject has the rights set out in Articles 15 to 22 of the GDPR, namely the rights to:

a) access the data in our possession, and to request a copy of it, except where the exercise of the right infringes the rights and freedoms of other natural persons;
b) request the rectification of any incomplete or inaccurate data;
c) request the deletion of the data, subject to the exclusions or limitations established by the applicable legislation (e.g. Article 17 § 3 GDPR);
d) request restriction of processing, where the conditions are met and subject to the exclusions set out in Art. 18 § 2 GDPR;
e) request a list of the data processors, with the additional data needed to identify them;
f) request the portability of the data (i.e. to receive them in a structured, commonly used and machine-readable format, in order to be able to transmit them to another Data Controller without hindrance), to the extent that the processing is based on consent or on the need to perform a contract, where technically possible and except where the exercise of the right would infringe the rights and freedoms of other natural persons;
g) lodge a complaint with the Garante per la Protezione dei Dati Personali (in Italy, www.garanteprivacy.it), or with the Data Protection Authority of the EU State where you normally reside or work, or of the place where the alleged violation occurred.

Right to object: data subjects may also object to processing based:

- on consent (ancillary purposes), either by not giving it initially or by revoking it subsequently (with the warning that any subsequent revocation of consent shall not affect the lawfulness of data processing carried out in the period prior to such revocation)
- on legitimate interest (purpose A.5), for reasons related to one's particular situation (e.g. prejudice to honour, reputation, decorum), subject to the Association's demonstration of a compelling and overriding legitimate interest pursuant to Article 21.1 GDPR, and unless the processing is required for the establishment, exercise or defense of a legal claim.

The exercise of the above rights may also be delayed, limited or excluded in the cases provided for in Article 2-*undecies* of Legislative Decree No. 196/2003.

Who can I contact with queries or to exercise my rights?

The data subject may contact the Data Controller by sending an e-mail to: privacy@unoaerre.it or to the Controller's other contacts.

GLOSSARY

"Supervisory Authority": the independent public authority established by a State of the European Union, or by the European Union itself, in charge of supervising the application of the Privacy Legislation (for Italy, the Garante per la Protezione dei Dati Personali, http://www.garanteprivacy.it).
"Privacy Code": the Legislative Decree No. 196/2003 as amended and/or supplemented (in particular by Legislative Decree No. 101/2018).
"Personal Data": "any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier or to one or more features of his or her physical, physiological, genetic, mental, economic, cultural or social identity', as defined in Article 4, subsection 1, no. 1, of the GDPR).
"Health Data" means Personal Data "relating to the physical or mental health of a natural person, including the provision of health care services, revealing information relating to his or her state of health", as defined by Article 4, subsection 1, no. 15, of the GDPR).
"GDPR" means the EU Regulation 2016/679 "on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)".
"Data Subject": an "identified or identifiable natural person", as defined in Article 4, subsection 1, no. 1, of the EU Regulation 2016/679 (so-called "GDPR").
"Applicable Legislation": any provision, of whatever rank, belonging to Italian or European Union law, in whatever way applicable to the association relationship.
"Privacy Legislation": the EU Regulation 2016/679 (GDPR), Legislative Decree 196/2003 as amended and/or supplemented (Privacy Code), as well as the measures adopted by the Supervisory Authority in execution of the tasks established by the GDPR and the Privacy Code, and further applicable legislation, of whatever rank, including the opinions and guidelines drawn up by the Committee.

"Profiling" means "any form of automated processing of personal data consisting of the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects of that natural person's professional performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements", as defined in Article 4, subparagraph 1, no. 4, of the GDPR.
"Data processor" means "the natural or legal person, public authority, service or other body that processes personal data on behalf of the controller", as defined in Article 4, subsection 1(8) of the GDPR.
"Third party" means "the natural or legal person, public authority, service or other body other than the data subject, the controller, the processor and the persons authorized to process personal data under the direct authority of the controller or the processor", as defined by Article 4, subsection 1, no. 10, of the GDPR.
"Controller" means "the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data", as defined in Article 4, subsection 1, no. 7 of the GDPR.
"Processing" means "any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction", as defined by Art. 4, subsection 1, no. 2, of the GDPR.

THE ICONS

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