

SUPPLIER PRIVACY NOTICE

Pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR)

I.DE.L. S.r.l.

Version: 1.0 – Rev.00

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1. Introduction

Collaboration with its suppliers represents an essential element in ensuring the quality of the products and services provided by **I.DE.L. S.r.l.**

The management of these business relationships necessarily requires the processing of certain personal data relating to individual suppliers, representatives of supplier companies, professionals and other individuals who work with the Company.

Through this Privacy Notice, **I.DE.L. S.r.l.** wishes to provide clear and transparent information regarding the manner in which such personal data are collected, used, retained and protected, in full compliance with **Regulation (EU) 2016/679 (GDPR)** and the applicable national data protection legislation.

2. Data Controller

The **Data Controller** responsible for the processing of personal data is:

I.DE.L. S.r.l.

Via G. Matteotti No. 1992

51036 Larciano (PT)

Italy

VAT No. 02337690461

Telephone: +39 0573 83355

E-mail: **info@idel.it**

Certified E-mail (PEC): **idel.srl@pec.it**

The Company has not appointed a **Data Protection Officer (DPO)**, as the conditions set out in **Article 37 of Regulation (EU) 2016/679 (GDPR)** do not apply to its organisation.

3. Categories of Personal Data Processed

For the purpose of establishing and managing the supply relationship, **I.DE.L. S.r.l.** processes exclusively the personal data necessary for carrying out the administrative, commercial and organisational activities associated with the contractual relationship.

Such data may include, without limitation:

- identification data relating to the supplier or the supplier's representatives;
- contact details (postal address, telephone number, e-mail address and Certified E-mail (PEC));
- tax and administrative information;
- bank account details required for payment transactions;
- personal data contained in contractual, administrative and accounting documentation;
- information relating to supplies, services provided and the commercial relationships established with the Company.

The Company does not collect or process **special categories of personal data**, except where such processing is required by law or where such data are voluntarily disclosed by the data subject.

4. Purposes of the Processing

Personal data are processed exclusively for the purpose of ensuring the proper management of the supply relationship.

In particular, personal data are processed in order to:

- assess and manage relationships with suppliers;
- request quotations and commercial proposals;
- issue purchase orders;
- manage deliveries, services and contractual performance;
- process payments;
- comply with administrative, tax and accounting obligations;
- manage complaints, disputes or legal proceedings;
- protect the Company's rights and legitimate interests.

Personal data are **not** processed for profiling activities or for direct marketing purposes.

5. Legal Basis for the Processing

The processing of personal data is based on one or more of the following legal grounds:

- the performance of a contract or the implementation of pre-contractual measures requested by the supplier;
- compliance with obligations arising under civil, tax and accounting legislation;

- the pursuit of the Company's **legitimate interests** in the proper management of its commercial and organisational relationships.

The provision of the requested personal data is necessary for the establishment and maintenance of the supply relationship. Failure to provide such data may prevent the conclusion of the contract or the proper performance of the contractual relationship.

6. Methods of Processing

Personal data are processed by both paper-based and electronic means, adopting appropriate **technical and organisational measures** designed to ensure their security, confidentiality and integrity.

Access to personal data is restricted exclusively to authorised personnel whose duties require such access and to external service providers that perform services strictly necessary for the management of the Company's business activities.

All persons involved process personal data in accordance with the instructions provided by the **Data Controller** and are bound by the confidentiality obligations established under the applicable data protection legislation.

7. Disclosure of Personal Data

For the purposes described above, personal data may be disclosed, to the extent strictly necessary, to the following categories of recipients:

- banking institutions;
- tax, accounting and legal advisers;
- information technology service providers;
- carriers, freight forwarders and logistics service providers;
- public authorities and competent governmental bodies;
- any other persons or entities to whom disclosure is required by law or is necessary for the performance of the contractual relationship.

Personal data are disclosed only to the extent necessary for the performance of the respective services or for compliance with applicable legal obligations.

Personal data are **not** disclosed to the public.

8. Data Retention Period

Personal data are retained for the entire duration of the supply relationship and, thereafter, for the period required by applicable civil, tax and accounting legislation or, in any event, for as long as necessary to establish, exercise or defend the Company's legal claims.

Upon expiry of the applicable retention periods, personal data will be securely erased or irreversibly anonymised, unless their continued retention is required by law.

9. Rights of Data Subjects

In accordance with **Articles 15 et seq. of Regulation (EU) 2016/679 (GDPR)**, data subjects may exercise, at any time, the rights granted by the applicable data protection legislation.

In particular, data subjects have the right to:

- obtain confirmation as to whether personal data concerning them are being processed;
- access their personal data;
- request the rectification of inaccurate or incomplete personal data;
- request the erasure of personal data where the applicable legal conditions are met;
- obtain the restriction of processing in the circumstances provided for by law;
- object to the processing of personal data where permitted by the applicable legislation;
- receive their personal data in a structured, commonly used and machine-readable format where the right to data portability applies.

Where data subjects believe that the processing of their personal data infringes the applicable data protection legislation, they are also entitled to lodge a complaint with the **Italian Data Protection Authority (Garante per la Protezione dei Dati Personali)**.

10. Exercising Data Subject Rights

For any request relating to the processing of personal data or to exercise any of the rights granted under the **General Data Protection Regulation (GDPR)**, data subjects may contact **I.DE.L. S.r.l.** using the following contact details:

I.DE.L. S.r.l.

Via G. Matteotti No. 1992

51036 Larciano (PT)

Italy

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The Company will respond to all requests within the time limits and in accordance with the procedures established by **Regulation (EU) 2016/679 (GDPR)**.