

▪ **PRIVACY POLICY**  
▪ **Article 13 Reg. EU 679/2016**

Dear Customer/Supplier,

We wish to inform you that Reg. EU 679/2016 (and Italian Legislative Decree no. 196/2003 and subsequent amendments, only as regards Reg. EU 679/2016) provides for the protection of individuals with regard to the processing of personal data. According to this legislation, this processing will be based on principles of propriety, lawfulness and transparency, protecting your privacy and your rights.

Pursuant to the aforementioned article 13 Reg. EU 679/2016, we therefore provide you with the following information:

- a)** The processing that the Data Controller may perform will be carried out using an automated process and/or collection of paper documents, and has the following purposes:
- Establishment and management of the commercial/professional relationship and related organisational activities.
  - Use of the services/purchase of goods that are the object of the commercial/professional relationship established with the data controller.
  - Management of the related pre-contractual, contractual, administrative, accounting, tax and legal obligations.
- b)** The provision of data is mandatory for the execution of the purposes referred to in letter a) and without them it may be impossible to establish the commercial/professional relationship. The processing is not based on the conditions set forth in art. 6, paragraph 1, letter f) REG. EU 679/2016.
- c)** Your personal data will be processed by individuals specifically appointed by the data controller as data processors and/or by anyone acting under its authority and having access to personal data. These parties will process your data only when necessary and for the purposes for which they were provided, and only in the performance of the tasks assigned to them by the data controller, committing to process only the data necessary for carrying out these tasks and to perform only those operations necessary to fulfil them.  
Furthermore, your personal data may be disclosed for the purposes referred to in paragraph a), to:
- External companies or professionals that perform specific tasks on behalf of the data controller (including but not limited to data processing, assistance and consulting on administration, accounting, taxes, legal issues, regulatory issues, management/maintenance/implementation of company information systems, etc.) only if the disclosure of your personal data is necessary or in any way useful for the fulfilment of the purposes referred to in paragraph a).
  - Law firms and lawyers for protection of contractual rights, if needed.
  - Credit institutions and, where necessary, to finance, leasing, recovery, protection and credit transfer companies for the management of financial transactions.
  - Central and peripheral state bodies, public bodies and other institutions for legal obligations.
- Depending on the case, the disclosures of data above are related to specific legal/contractual obligations, or are necessary for the conclusion of the contractual relationship, or are strictly related to normal business operations in the management of the established contractual relationship and strictly necessary for the purposes referred to in paragraph **a)**. Therefore, failure to disclose them may make it impossible to establish the contractual relationship.

**c1)** The Data Controller may transfer personal data to a third country or an international organisation. In these cases the Data Controller agrees to carry out the processing only if the appropriate guarantees are in place.

**c2)** In compliance with the "Measures prescribed to data controllers using electronic instruments with respect to the assignment of the functions of system administrator - 27 November 2008" (O.J. no. 300 of 24 December 2008) and related additions and amendments, the data controller may appoint specific "**System Administrators**" who in the performance of their functions may directly or indirectly access services or systems that process or allow the processing of personal information.

**c3)** The data will not be disclosed to third parties without your express prior consent.

**Your personal data will not be disseminated.**

- d)** The data will be kept for the time necessary to achieve the purposes specified above and to comply with regulatory obligations in the sector. The retention period will be determined by the duration of the commercial/professional relationship and by the administrative, accounting and fiscal obligations.
- e)** The personal data provided will never be processed using an automated decision-making algorithm (so-called profiling).

- f) If the personal data provided must be processed for purposes other than those specified above, the Data Controller will provide you with information regarding this different purpose and any other relevant information.

Taking into account the state of the art and implementation costs as well as the nature, scope, context and purpose of the processing both when determining the means of processing and at the time of processing itself (so-called risk analysis - accountability), the Data Controller has put in place adequate technical and organisational measures aimed at effectively implementing data protection principles and incorporating the necessary guarantees in order to meet the requirements of Reg. EU 679/2016 and to protect the rights of the data subject.

In this context, personal data will be processed for purposes related and/or instrumental to the commercial/professional relationship established, in compliance with the objectives to be pursued above.

Data will be processed using methods and instruments that guarantee security (art. 24, 25 and 32 Reg. EU 679/2016) and will be carried out through an automated process and through non-automated means (paper archives), to which all technical and organisational measures will be applied to ensure a level of security appropriate to the risk, so as to ensure their confidentiality, integrity, availability and resilience of the processing systems and services on a permanent basis (including but not limited to: controls both of the assignment of tasks to the persons responsible for data processing and of the classification of the data themselves; pseudonymisation and encryption procedures, if sustainable; disaster recovery mechanisms etc.).

We inform you that the processing of data is necessary because it is based on the provisions of art. 6, paragraph 1, letter b) of Reg. EU 679/2016 since the processing is necessary for the execution of a contract that the data subject is a party to, or for the execution of pre-contractual measures implemented at his/her request (execution of the commercial/professional relationship existing between the Parties).

The **data controller** is: Tang, A.Stepnica 36 – 35400 Nova Gradiška, HRVATSKA – MB 3000010, @mail: [tang@sb.t-com.hr](mailto:tang@sb.t-com.hr), Telefon: ++385 35 362019, Telefon: ++385 35 330 011, Telefax: ++385 35 362635

Pursuant to art. 28 of Reg. EU 679/2016, the Data Controller may use third parties that process data on its behalf and formally appointed by it as data processors. The complete and updated list of appointed data processors will be provided to you by the Data Controller upon request, by sending a communication to the addresses specified above.

Pursuant to art. 29 of Reg. EU 679/2016, the Data Controller may make use of anyone acting under its authority and/or the appointed manager; these parties will be duly instructed.

Currently the Data Controller has not designated a DPO (art. 37 Reg. EU 679/2016 and WP Guidelines article 29 of 13.12.2016) as it is not a required role within the structure given that the characteristics of the processing do not fall within the cases referred to in the aforementioned article 37.

The Data Controller also informs you that:

- g) The data subject has the right to ask the Data Controller to access his/her personal data and for their correction or erasure, or to restrict or object to their processing, in addition to the right to data portability (art. 15, 16, 17, 18, 20 Reg. EU 679/2016). When exercising the right of access, the data subject has the right to know from the data controller whether his/her personal data are being processed, while the exercise of the right to portability allows the data subject to obtain personal data from the data controller in a commonly used, readable, structured format or the transfer of such data from the original data controller to another (see WP 242 of 13.12.2016).
- h) In the event of processing based on article 6, paragraph 1, letter a) or on article 9, paragraph 2, letter a), the data subject has the right to withdraw consent at any time without prejudice to the lawfulness of the processing carried out based on the consent given before the withdrawal.
- i) The data subject has the right to lodge a complaint with a supervisory authority.
- j) The data subject has the right to be informed by the Data Controller without justified delay of a breach of personal data that presents a high risk to the rights and freedoms of natural persons (art. 34 Reg. EU 679/2016).

The full text of the articles in Reg. EU 679/2016 related to your rights (articles from 15 to 23) is available at the following link on the website of the Personal Data Protection Authority:

- <https://www.garanteprivacy.it/documents/10160/0/Regolamento+UE+2016+679.+Arricchito+con+riferimenti+ai+Considerando+Aggiornato+alle+rettifiche+pubblicate+sulla+Gazzetta+Ufficiale++dell%27Unione+euro+pea+127+del+23+maggio+2018>

or, alternatively, they will be provided to you by the Data Controller upon request.