

NOTICE PURSUANT TO ARTICLE 13 OF EU REGULATION NO. 2016/679
– SUPPLIER/CONSULTANT/PROFESSIONAL –

SNATT LOGISTICA S.p.A., (Tax No. and VAT No.: 02060420359) (hereinafter “SNATT”), in the person of its current legal representative, with registered office at Via Kennedy, 12/b, 10, in its capacity as Data Controller pursuant to Articles 4(7) and 24 of EU Regulation No. 2016/679 (GDPR), hereby informs you, pursuant to Article 13 of the GDPR, that the personal data described in more detail in Article 1 below will be processed for the purposes set out in Article 2.

1. Categories of data subject to processing.

1.1. SNATT collects and processes, for the purposes of processing set out in Article 2, personal data as defined in Article 4(1) of the GDPR, namely so-called ‘identifying’ data (e.g. first name; surname; tax code; residential address/domicile/place of residence) and so-called ‘financial’ data (e.g. bank/postal account) (hereinafter “personal data”), including any non-personal data pursuant to Article 3(1) of EU Regulation No 2018/1807 (e.g. VAT number) attributable, directly or indirectly, to a supplier/consultant/professional, including any relevant workforce of an employee or similar nature.

2. Purposes of processing and legal basis.

2.1. Personal data is processed by SNATT for the following processing purpose:

- a. Performance of a pre-contractual measure (e.g. quotation) and/or a contractual relationship, including the related and consequent regulatory and administrative obligations.

In accordance with Article 13(2)(e) of the GDPR, SNATT specifies that failure to provide the requested personal data may result in the inability to fully and correctly carry out the processing purpose described in Article 2.1(a). In this regard, SNATT specifies that the legal basis for the processing purpose described in Article 2.1(a) is found in the following regulatory provisions: Article 6(1)(b) and (c) of the GDPR.

2.2. Personal data is processed by SNATT for the following processing purpose:

- b. If necessary, the exercise or defence of a right or interest (including a credit claim), including in court proceedings.

In accordance with Article 13(1)(d) of the GDPR, SNATT specifies that the legitimate interest pursued through the processing purpose referred to in Article 2.2(b) consists in protecting, defending or asserting rights or interests (including credit claims), including in court proceedings: in this regard, SNATT specifies, in accordance with paragraph 1.3 of Provision No. 146 of 5 June 2019 signed by the Data Protection Authority, that, for this purpose, the matter must concern ongoing litigation or a pre-litigation situation. In this regard, SNATT finally specifies that the legal basis for the processing purpose referred to in Article 2.2(b) is found in the following provision: Article 6(1)(f) of the GDPR.

3. Retention period.

3.1. In accordance with Article 13(2)(a) of the GDPR, SNATT hereby sets out the following retention periods/time limits, at the end of which personal data will be subject to erasure, destruction or anonymisation: (i) for the performance of the processing purpose referred to in Article 2.1. point (a): 1 year, starting from the final conclusion of a pre-contractual measure (which may be extended in order to comply with a regulatory obligation (including one that has arisen subsequently) or to assert or defend a right, including in court proceedings), in the event that this has not resulted in a contractual relationship with SNATT: should the latter occur, SNATT also specifies that personal data will be retained for 10 years pursuant to Articles 2220 and 2946 of the Italian Civil Code, starting from the definitive termination of the relevant contractual relationship, which may be extended in order to comply with a regulatory obligation (including one that has arisen subsequently) or to assert or defend a right, including in court; (ii) for the purposes of processing referred to in Article 2.2. letter b): for the time necessary to protect one’s own right or interest, including in court proceedings; this time limit may be extended for a period of 10 years from the definitive conclusion of the dispute (see, by analogy, the document “National Archival System – Guidelines for the Selection and Disposal of Documents”, signed by the Italian Revenue Agency).

4. Recipients.

4.1. In accordance with Article 13(1)(e) of the GDPR, SNATT specifies that personal data may be disclosed, where appropriate and necessary, to one or more recipients pursuant to Article 4(9) of the GDPR, identified, in general terms, by category as follows: (i) for the purposes of processing referred to in Articles 2.1 and 2.2: persons authorised by SNATT to process data; consultants/companies of various kinds providing services connected, even indirectly, to the processing purposes in question (e.g. ICT companies; tax and/or legal advisers); subsidiaries/affiliates of SNATT.

5. Transfer.

5.1. Personal data are/may be stored in automated, partially automated or non-automated files belonging to or otherwise attributable, even indirectly, to SNATT, and located within the European Economic Area (EEA). In the event that data is stored in fully or partially automated files potentially outside the EEA, SNATT hereby states that, pursuant to Article 13(1)(f) of the GDPR, it will comply with the safeguards set out in Chapter V of the GDPR.

6. Rights of the data subject.

6.1. With regard solely to personal data, SNATT informs you of the right to exercise the following rights, which may be subject to the limitations provided for in Articles 2-undecies and 2-duodecies of the Privacy Code: right of access pursuant to Article 15 of the GDPR: the right to obtain confirmation as to whether or not personal data concerning the data subject are being processed, as well as the information referred to in Article 15 of the GDPR (e.g. purposes of processing, retention period); right to rectification pursuant to Article 16 of the GDPR: the right to correct, update or supplement personal data; right to erasure pursuant to Article 17 of the GDPR:

the right to obtain the erasure, destruction or anonymisation of personal data, provided that the conditions set out in that Article are met; right to restriction of processing under Article 18 of the GDPR: a right with a distinctly precautionary nature, aimed at obtaining the restriction of processing where the conditions set out in Article 18 apply; right to data portability under Article 20 of the GDPR: the right to obtain personal data provided to SNATT in a structured, commonly used and machine-readable format (and, where requested, to have it transmitted directly to another data controller), where the specific conditions set out in the same article are met (e.g. legal basis of consent and/or performance of a contract; personal data provided by the data subject); right to object pursuant to Article 21 of the GDPR: the right to obtain the permanent cessation of a specific processing operation involving personal data; right to lodge a complaint with the Supervisory Authority (i.e. the Italian Data Protection Authority) pursuant to Article 77 of the GDPR: the right to lodge a complaint where it is considered that the processing under review infringes national and EU legislation on the protection of personal data.

6.2. In addition to the rights described in Article 6.1 above, SNATT specifies that, in relation solely to personal data, there is, where possible and relevant, the right to exercise, on the one hand, the (sub)right provided for in Article 19 of the GDPR ("The data controller shall inform each recipient to whom the personal data have been disclosed of any rectification, erasure or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject of such recipients if the data subject so requests"), to be considered connected and linked to the exercise of one or more rights regulated by Articles 16, 17 and 18 of the GDPR; on the other hand, SNATT specifies that, in relation solely to the personal data described in Article 1 above, there is, where possible and relevant, the right to exercise the right provided for in Article 22(1) of the GDPR ("The data subject shall have 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 similarly significantly affects him or her"), subject to the exceptions provided for in paragraph 2 below.

6.3. In accordance with Article 12(1) of the GDPR, SNATT undertakes to provide the information referred to in Articles 15 to 22 and 34 of the GDPR in a concise, transparent, intelligible and easily accessible form, using clear and plain language: such information shall be provided in writing or by other means, including electronic means, or, at the request of the data subject, shall be provided orally provided that the identity of the data subject is verified by other means.

6.4. In accordance with Article 12(3) of the GDPR, SNATT hereby informs you that it undertakes to provide information regarding the action taken in response to a request pursuant to Articles 15 to 22 of the GDPR without undue delay and, in any event, no later than one month from receipt of the request; this period may be extended by two months if necessary, taking into account the complexity and number of requests (in such cases, SNATT undertakes to inform the data subject of this extension and the reasons for the delay within one month of receiving the request).

6.5. The rights described above (with the exception of the right under Article 77 of the GDPR) may be exercised using the contact details set out in Article 7 below.

7. Contact details.

7.1. SNATT can be contacted at the following address: snattlogisticaspa@legalmail.it

7.2. The Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, appointed by SNATT, is Gabriele Borghi, who may be contacted at the following address: dpo@snatt.it

Campegine (RE), 12 June 2025 (date of last update).

SNATT LOGISTICA S.p.A.

(in the person of its pro tempore legal representative)