

Suppliers/Consultants Disclosure

Who are we and what do we do with your personal data?

As Data Controller (hereinafter referred to as the “Controller”), Kedrion S.p.a. protects the confidentiality of your personal data and guarantees its protection from any event that may put it at risk of breach.

To this end, the Controller implements policies and practices regarding the collection and use of personal data and the exercise of the rights assigned to you under applicable legislation. The Controller updates the policies and practices applied for the protection of personal data each time this becomes necessary and in any case, any time legislative or organisational changes take place, which may affect the processing of your personal data.

The Controller has appointed a Data Protection Officer (DPO), whom you may contact if you have any questions about the policies and practices adopted. The Data Protection Officer can be contacted at:

DPO@kedrion.com

How does Kedrion S.p.A. collect and process your data?

The Controller collects and/or receives information about you, including: first name, surname, VAT number and tax code, physical and electronic address, telephone number, images, ID code, data relating to criminal convictions and crimes or related security measures.

The data collected is used by the Controller to fulfil purposes that are instrumental and functional to the fulfilment of the contract and/or precontractual relationship and to fulfil legal and regulatory obligations assigned to the Controller by virtue of its activities. Your personal data is mainly disclosed to third parties and/or addressees whose activities are necessary for the correct performance of the supply relationship and also to comply with certain legal obligations. Any communication for different purposes will be subject to your consent.

The Controller transfers your personal data abroad. Your personal data will not be in any way disseminated or disclosed to unidentified entities that cannot even be identified as third parties.

The personal information about you will be processed to:

1) management of the supply contract and consequent regulatory and other requirements

Your personal data is processed in order to carry out preliminary and consequent activities to the management of the supply contract and those instrumental and functional to its fulfilment, as well as to fulfil all other contractual obligations.

The obligations the Controller is called to fulfil in respect of the contract and specific legislation governing it are, amongst others, the following:

- keeping of accounts.

Your personal data is also collected from third parties, such as, by way of example:

- other data controllers, e.g. legal entities or the companies of the group to which the Controller belongs;
- lists held by public or equivalent entities or those under the control of the public authority in accordance with specific national and/or European legislation;

The personal data processed by the Controller to the end above includes:

- first name, surname, VAT number and tax code, physical and electronic address, telephone number, images, ID code, data relating to criminal convictions and crimes or related security measures;
- related to your commercial and/or professional activity.

2) for communication to third parties and addressees

Your personal data is processed according to the contract and the ensuing legal and/or regulatory and/or other obligations.

Your data will not be disclosed to any third parties/addressees for their own autonomous purposes, unless:

1. you should authorise this;
2. this should be necessary in order to fulfil obligations arising from the contract and provisions of law governing it;
3. communication is made to the companies of the group to which the Controller belongs, for administrative purposes: companies involved in administrative and accounting management; banks for the management of collections and payments; financial administrations and public entities in fulfilment of regulatory obligations, including deriving from group membership; data processing and IT services companies (e.g. web hosting, data entry, infrastructures maintenance and management and IT services, etc.).

The personal data processed by the Controller to this end includes:

- first name, surname, VAT number and tax code, physical and electronic address, telephone number, images, ID code, data relating to criminal convictions and crimes or related security measures;
- related to your commercial and/or professional activity.

What happens if you do not supply your data?

Your data, collected or in any case obtained by the Controller, is considered necessary and failure to confer such will make it impossible for the Controller to follow up on activities relating to the main processing, i.e. to:

- the management of the supply contract;
- the fulfilment of legal and other requirements stemming from the contract stipulated.

The Controller intends to carry out certain processing according to specific lawful interests that do not prejudice your right to confidentiality, such as those that:

- enable the prevention of contractual and other fraud;
- enable the prevention of IT incidents and the notification of the control authority or communication to users, if necessary, of the personal data breaches;
- enable the communication of personal data to companies of the group to which the Controller belongs for administrative purposes;
- enable the communication to third parties/addressees for activities connected with those of the management of the contract.

How

Data is processed using hard copies or computerised procedures by internal subjects who are specifically authorised and trained to this end. They are granted access to your personal data to the extent and within the limits that this is necessary in order to perform the relevant processing.

The Controller regularly checks the tools used to process your data and the security measures envisaged for them, which it also ensures are kept constantly up-to-date; it verifies, both directly and through the authorised processors, that no personal data is collected, processed, stored or kept of which processing is not necessary; it further verifies that data is kept with a guarantee of integrity and authenticity and that it is only used for the actual processing purposes.

Where

Data is stored as hard copy, computer and electronic archives held within the European Economic Area and can be transferred to the following non-EU countries - with full assurance of the guarantees given by European legislation:

- the USA, existence of the decision of adequacy, Implementing Decision (EU) 2016/1250 of the European Commission of 12 July 2016, in accordance with Directive 95/46/EC of the European Parliament and Council, on the adequacy of the protection afforded by the EU-USA shield system for privacy [notified by number C(2016) 4176].
- MEXICO, COLOMBIA, BRAZIL, TURKEY, RUSSIA, INDIA, VIETNAM, SERBIA: existence of standard contractual clause no. 50071/2004 of 27 December 2004 and/or standard contractual clause no. 2010/87 of 05 February 2010.

How long

The personal data processed by the Controller is kept for the time necessary to complete the activities connected with the management of the contract with the Controller and for up to ten years after its conclusion or from when the rights depending on it can be enforced (in accordance with Articles 2935 and 2947 of the Italian Civil Code); as well as for the fulfilment of obligations (e.g. tax and accounting) that remain even after conclusion of the contract (Art. 2220 of the Italian Civil Code), to which end the Controller shall store only the data necessary in this respect. This is without prejudice to cases where the rights deriving from the contract must be enforced before the courts, in which case, your data, only that necessary to this end, will be processed for the length of time essential to their pursuit.

This is in any case without prejudice to your right to object to the processing at any time, on the basis of a lawful interest therein, for reasons connected with your specific situation.

What are your rights?

In short, at any time and free of charge, at no cost and with no particular formalities for your request, you can:

- obtain confirmation of the processing performed by the Controller;
- access your personal data and know their origin (when the data is not obtained from you directly), the purposes and aims of the processing, the data of the subjects to which it will be disclosed, the time for which your data will be kept or the criteria useful to determining this;
- update or rectify your personal data so as to ensure that it is always exact and accurate;

- erase your personal data from back-up and other databases and/or archives of the Controller if, amongst other situations, it is no longer necessary for the purpose of the processing or if this is assumed to be unlawful and as long as the legal conditions are met; and in any case if processing is not justified by another equally legitimate reason;
- limit the processing of your personal data in some circumstances, for example where you have challenged its exactness, for the period necessary to the Controller to verify its accuracy. You must be informed, in time, also of when the suspension period has expired or the cause for the limitation to processing ceased applying and, therefore, said limitation has been revoked;
- obtain your personal data, if received or processed by the Controller with your consent and/or if its processing takes place in accordance with a contract and using automated tools, in electronic format, also so as to send it to another data controller.

The Controller must proceed in this sense without delay and in any case at the latest within a month of receiving your request. The terms may be extended by two months, if necessary, considering the complexity and number of requests received by the Controller. In these cases, the Controller shall, within a month of your request, inform you and make you aware of the reasons for the extension.

For any further information and in any case to send your request, please contact the Controller at privacy@kedrion.com

How and when can you object to the processing of your personal data?

For reasons relating to your specific situation, you may object at any time to the processing of your personal data if your objection is based on a legitimate interest, sending any such request to the Controller at privacy@kedrion.com

You are entitled to have your personal data erased if there is no legitimate reason that prevails over the reason that gave rise to your request.

To whom should you submit a complaint?

Without prejudice to any other administrative or legal action, you may submit a complaint to the competent control authority or to the one carrying out its duties and exercising its powers in Italy where you have your normal place of residence or where you work or, if different, in the Member State where the violation of Regulation (EU) 2016/679 took place.

You will be informed of any update to this disclosure promptly using appropriate means. You will also be informed if the Controller should follow up on the processing of your data for purposes over and above those pursuant to this disclosure before proceeding with this and sufficiently ahead of time as to allow you to give your consent, where necessary.