Privacy Notice for Suppliers

Dear Supplier,
by means of this notice, CARE HOTEL LAZISE SRL provides you with information on the processing of the personal data, including sensitive data, that you have provided and that are necessary for carrying out administrative, accounting, management and contractual services connected with or arising from the performance of the contract. This notice is provided pursuant to Article 13 of Regulation (EU) 2016/679 (the "GDPR").

1. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER

The Data Controller is Care Hotel Lazise srl, with its operational office at Via Monte Baldo 14/D, 37069 Villafranca (VR). The Data Controller has appointed a Data Protection Officer, who may be contacted at dpo@careholding.it.

2. PURPOSE OF THE PROCESSING

The purpose of the processing for which consent is not required is the fulfilment of the contractual obligations: the collection and/or processing of personal data is intended to ensure the proper fulfilment of the obligations connected with the conduct of our company's business in relation to our supply of goods and services, and in particular for the following purposes: requirements preliminary to the conclusion of a contract; fulfilling contractual obligations of an accounting, management and administrative nature towards the data subject by carrying out the acts and operations necessary to fulfil those obligations; contacting the client for communications relating to the contract or for purely informational purposes; completing the formalities connected with or necessary for the performance of the contract with any public or private body; and complying with legal obligations. For the same purposes, the personal and contact details (personal details, business e-mail addresses, business telephone numbers, smartphones for work purposes, etc.) of your directors, employees and collaborators who, on the basis of the duties and assignments conferred upon them, manage and/or carry out activities under the contract may also be processed.

3. LEGAL BASIS FOR THE PROCESSING

3.1. Since the processing of personal data is necessary for the performance of a contract to which the data subject is a party or for taking steps at the data subject's request prior to entering into a contract, the legal basis for the processing is Article 6(1)(b) of the GDPR, namely the performance of a contract, as well as Article 6(1)(c) GDPR as regards compliance with the legal obligations relating to or arising from the contract.
3.2. For security purposes, the legal basis is the legitimate interest pursuant to Article 6(1)(f), aimed at safeguarding the integrity of the company's assets and interests, as well as the safety of persons performing their duties at the Data Controller's premises, and in establishing, exercising or defending legal claims.
3.3. With regard to the publication and/or dissemination of images through the channels indicated in Section 2 of this notice, the legal basis is consent pursuant to Article 6(1)(a) GDPR. By signing the relevant form, you give your consent. Such consent shall remain valid until withdrawn by written notice, to be sent to the Data Controller by certified e-mail (PEC) or registered letter with acknowledgement of receipt to the addresses indicated above.

4. METHODS OF DATA PROCESSING

Processing shall be carried out using electronic, computerised or automated means, as well as paper-based methods.
Processing is carried out by the Data Controller and its collaborators and/or employees acting as persons authorised to process personal data, as well as by processors specifically appointed in writing, within the scope

of their respective duties and in accordance with the instructions given by the Data Controller, with appropriate measures in place to ensure the security and confidentiality of the data processed.
In accordance with the provisions of the Regulation, processing carried out by the Controller shall comply with the principles of lawfulness, fairness, transparency, purpose limitation and storage limitation, data minimisation, accuracy, integrity and confidentiality.
The data shall at all times be processed in strict compliance with the principle of confidentiality, including when they are handled by third parties expressly authorised by the Data Controller.
Your personal data are not subject to any automated decision-making.

5. DATA RETENTION PERIOD

Your personal data shall be stored throughout the performance of the contract and for a period of ten years following its termination/completion in order to comply with tax and accounting obligations, as well as to protect the Controller's rights in the event of disputes arising from the contract itself. Data collected to comply with legal obligations shall be stored until such obligations have been fulfilled and, in any event, in accordance with the storage periods/criteria laid down by the legal obligations applicable to the Data Controller. Further retention shall remain permitted where necessary to defend the Controller's rights.
For security purposes, data shall be retained until such purposes have been achieved, without prejudice to further retention where necessary to defend the Controller's rights.
This notice shall also be deemed valid for any subsequent contracts that you may enter into with the Controller.

6. RECIPIENTS OF PERSONAL DATA

The personal data you provided may be accessed by the Controller, authorised persons and/or processors. A list of Processors, where appointed, is available upon request.
The Data Subject's personal data are disclosed mainly to third parties and/or recipients whose services are necessary for the carrying out activities relating to the execution of the contractual relationship established and to comply with certain legal obligations, such as:
a) entities processing the data in compliance with specific legal obligations;
b) credit institutions providing services necessary for the purposes described above;
c) companies providing software and hardware support;
d) companies or professionals providing judicial or extrajudicial assistance to protect the Controller's rights;
e) external consultants providing services related to the purposes indicated above, identified in writing and provided with specific written instructions with regard to data processing;
f) in general, all public and private entities to which disclosure is necessary for the proper and complete fulfilment of the purposes indicated above.

7. DISSEMINATION OF PERSONAL DATA

Unless you specifically request otherwise in writing, or pursuant to a specific order issued by the judicial authority or legal obligation, the personal data you provide shall not be disseminated.

8. TRANSFER OF PERSONAL DATA ABROAD

The Data Subject's personal data are paper-based, computerised and stored in electronic archives located within the European Union. It is understood, however, that the Data Controller may, if necessary, relocate the servers outside the EEA. In such a case, the Controller hereby confirms that any transfer of data outside the EEA shall take place in accordance with the applicable legal provisions, subject to the execution of the standard contractual clauses adopted by the European Commission.

9. PROVISION OF PERSONAL DATA.

The provision of personal data is not mandatory; however, it is necessary for the proper fulfilment of contractual and pre-contractual obligations. The Controller specifies that you will only be asked to provide the data necessary for entering into the contract and for the fulfilment of the obligations or legal requirements arising from it.

10. REFUSAL TO PROVIDE PERSONAL DATA.

Failure by the data subject to provide the required data shall make it impossible to enter into the contract and take the pre-contractual steps you have requested, and to properly fulfil the contractual obligations, as well as the formalities (including legal formalities) arising from or connected with the contract and, more generally, to carry out the activities indicated above.

11. RIGHTS OF THE DATA SUBJECT.

The legislation grants the Data Subject specific rights set out in Articles 15 to 22 of the GDPR, including the right to obtain from the Controller confirmation as to whether or not personal data concerning them are being processed (i.e. the right of access), to obtain such data in an intelligible form, as well as the right to have such data rectified or erased, to restrict their processing in whole or in part, or to object to such processing on legitimate grounds and/or to withdraw consent to the processing at any time (without prejudice to the consequences indicated), or to request the portability of their personal data processed on the basis of specific consent, or to request that such data be updated.

The data subject has the right to be informed of the source of the data, the purposes and methods of the processing, the logic involved in the processing, the identification details of the Controller and the recipients to which the data may be disclosed.

The Data Subject also has the right to request the anonymisation, restriction or blocking of data processed unlawfully; the Data Subject may also lodge a complaint concerning the unauthorised processing of data with the *Garante per la Protezione dei Dati Personali* (Italian Data Protection Authority) in accordance with the procedures published on the Authority's website (http://www.garanteprivacy.it).

Requests relating to the exercise of the aforementioned rights may be addressed to the Controller, at the contact details indicated above, without any formalities or, alternatively, using the form provided by the *Garante per la Protezione dei Dati Personali* available on the website indicated above.

The aforementioned rights may be exercised by written communication sent by certified e-mail (PEC) or by registered letter with acknowledgement of receipt addressed to the entity referred to above.