

## 1. CONTROLLER AND CONTACTS

Personal data's Controller is Kardia S.r.l., specifically its legal representative Mr. Davide Longoni – mail address: [info@kardia.it](mailto:info@kardia.it) – physical address: Via Cormons 18 – 20151 Milan (Italy).

## 2. INTERNAL PROCESSOR AND CONTACTS

Data Protection Officer (or DPO) is Ms. Virginia Basicò – mail address [dpo@kardia.it](mailto:dpo@kardia.it) – physical address: Via Cormons 18 – 20151 Milan (Italy).

## 3. PRIVACY CONTACT

Internal privacy contact is Ms. Simona Bruni – mail address: [amministrazione@kardia.it](mailto:amministrazione@kardia.it) – physical address: Via Cormons, 18 – 20151 Milan (Italy)

## 4. SUPPLIERS OR POTENTIAL SUPPLIERS' DATA SUBJECTS AND PROCESSING PURPOSES

The Controller processes the following suppliers or potential suppliers' personal data:

- Identification data (business name, name, surname, data included in the company certificate);
- contact data (phone number, cell phone, e-mail address, certificated mail address, fax number);
- Bank account details;
- Information from resumés and related to professional experiences (for contributors);
- Data from company certificates and any other documentation included in suppliers' selection internal procedures.

Personal data are processed for the following purposes:

- Ask for information related to the supplier's activities;
- Start and management of a trade or professional relationship;
- Fulfil the agreed purposes and control them;
- Fulfil obligations provided by law and European Union's rules;
- Allow the administrative/accounting management;
- Manage any travels (outside EU too)
- Allow the controller to take photos and videos during events and congresses (please see the dedicated disclaimer)
- Manage any claim and complaint.

## 5. LAWS

Laws allowing data processing as per the purposes listed in paragraph 4 above are as follows:

- Art. 6 paragraph 1 letter B) of GDPR: data processing is needed to fulfil a contract where the subject is a part or to fulfil some pre-contractual measures specifically required by the subject;
- Art. 6 paragraph 1 letter C) of GDPR: data processing is needed to fulfil a law obligation of the controller.
- Art. 6 paragraph 1 letter F) of GDPR: data processing is needed to fulfil controller's or third party's legitimate interests, unless interests or rights of the party requiring data protection prevail.

## 6. SOURCES

Suppliers' data will always be sourced at the suppliers themselves.

## 7. DATA PROVISION'S NATURE AND CONSEQUENCE FROM REFUSAL TO REPLY

Giving such data is fundamental to fulfil the purposes specified above. Any refusal to provide such data could make impossible for the controller to fulfil law or contractual obligations.

## 8. PROCESSING METHODS, KEEPING CRITERIA AND TIMING

Personal data processing is carried out through the activities mentioned in article 4 of the EU Regulation no. 679 of 2016, both on paper and electronically.

Your personal data will be kept for no longer than is necessary for the purposes for which they were collected or subsequently processed,

pursuant to article 5, letter e) of the EU Regulation no. 679 of 2016, that is 10 years since the end of commercial transactions. After that amount of time, data will be destroyed, erased or anonymized, compatibly with the technical deletion and back-up procedures and controller's accountability needs.

## 9. DATA ACCESS

Data provided by you will be processed by properly authorized internal employees, monitored by the above-mentioned Controller and DPO, for example: accounting consultants, IT companies, law firms, Safety Consultant and RSPP (for tenders pursuant to art. 26) and independent controllers, such as public authorities, as strictly allowed by law, or to defend a right in court, banks, insurance companies, auditors(certifiers providing supporting services).

## 10. DATA COMMUNICATION AND DISTRIBUTION

Without needing your permission (art. 6 of EU Reg. no. 679 of 2016), the Controller can communicate your data for the purposes mentioned in article 3 above to control and inspection bodies, tax authorities and any other party to which the communication is mandatory by law and for the above-mentioned purposes. These parties will process data as independent controllers. Your data will not be published.

## 11. AUTOMATED PROCESSING AND PROFILING

Personal data are not subject to any automated decision-making process, including profiling.

## 12. PERSONAL DATA TRANSFER ABROAD

Personal data processing and storage will happen on Italian-based servers and clouds. Data will not be transferred outside the European Union, unless the ones regarding professionals if travelling abroad.

## 13. DATA SUBJECT'S RIGHTS

Pursuant to articles 15-18 and 20-21 of the UE Regulation no. 679 of 2016, you have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and their communication in a form that you can understand. You have the right to access the following information: a) personal data source, b) processing purposes and methods, c) logic involved for data processed through electronic means, d) identification data of the Controller, and responsible if any; e) the recipients or categories of recipient to whom personal data have been or will be disclosed as responsible or in-charge persons. Moreover, you have the right to obtain: a) the data update, rectification, and, when interested, their completion; b) erasure, anonymization, or the denial of data processed violating law, including data whose keeping is not needed for the purposes data were collected or subsequently processed; c) certification that the parties data were communicated or disclosed to acknowledge the activities mentioned in points a. and b., including their content, except when this would be impossible or require clearly disproportionate means compared to the right protected. You have the right to oppose: a) to your personal data processing for legitimate reasons, although relevant to the gathering purposes; b) to your personal data processing aimed at sending advertisement, direct sale, market research or commercial communication. You have the right to data portability, that is receiving in a structured, understandable format your personal data and you have the right to communicate such data to other controllers.

Moreover, you have the right to file a complaint to a control authority (in Italy, the Data Protection authority; [www.garanteprivacy.it](http://www.garanteprivacy.it)).

## 14. HOW TO EXERCISE RIGHTS

Written requests shall be submitted to the Controller at the addresses listed in paragraph 2 and 3. In case of requests that are baseless or excessively expensive, including for their repetitiveness, the Controller could ask for a reasonable expenses refund, or could deny the request.