

## INFORMATION NOTICE FOR SUPPLIERS AND SUB-SUPPLIERS ON THE PROCESSING OF PERSONAL DATA

Italgas S.p.A. (hereinafter, for the sake of brevity, "**Company**"), as data controller wishes to inform you, pursuant to Art. 13 and 14 of European Regulation 679/2016 on the protection of personal data ("**Regulation**") and national legislation, including the individual measures of the Supervisory Authority (Italian data protection authority) where applicable, that the personal data referred to in point 1) below, of which it comes into possession for the performance of activities aimed at the identification and qualification of suppliers, inclusion in the suppliers' list, selection procedures, the entering into and implementation of contracts between Italgas Group companies and third parties - including management of the contractual relationship, filing of administrative and technical documentation and related further fulfilments -, will be processed in compliance with the legislative and contractual provisions in force for the purposes and in the manner indicated below.

In addition to during the qualification process, entering into and implementation of contracts, data may also be collected from publicly accessible sources, such as databases, internet sources and media news, as well as by consulting public information provided by third parties.

### **1) Types of personal data**

#### Common personal data and data on criminal convictions and offences

The Company mainly processes the following categories of personal data:

- personal data pertaining to representatives of suppliers and sub-suppliers and to employees and collaborators of the same (including, by way of example, legal representatives, partners, agents, employees, delegates persons and affiliated subjects). This is common data, including identification and contact data (such as, for example, name, surname, date of birth, tax code, address, telephone contacts, residence, domicile, certified e-mail (PEC), e-mail, bank details), CVs, certifications and qualifications;
- judicial data relating to persons identified by art. 80, paragraph 3, of Legislative Decree no. 50 of 2016 (Italian Public Contracts Code) suitable to reveal rulings in the area of criminal records, as well as the existence of ongoing criminal proceedings resulting from certificates of pending charges;
- data certifying possession of the requirements provided for by anti-mafia legislation (Legislative Decree no. 159/2011) and, in particular, the absence of causes of suspension, disqualification or prohibition referred to in art. 67 of Legislative Decree no. 159/2011 and mafia infiltration attempts referred to in art. 84 of the same Decree.

### **2) Purpose of the processing and legal basis for the processing**

Personal data you have provided will be processed solely for the purpose of:

- a) managing the online registration and qualification process on the Italgas supplier portal, in order to obtain and/or maintain qualification and inclusion in the Company's Vendor List;
- b) verifying existence of the requirements provided for by law for participation in procurement procedures, in particular for the purposes of carrying out reputation checks on suppliers, anti-mafia checks pursuant to Legislative Decree no. 159/2011 and the general requirements pursuant to art. 80 of Legislative Decree no. 50/2016 (Contracts Code);
- c) compliance with the "Ethics and Integrity Pact" (an act subject to compulsory adhesion, available on the Italgas Suppliers' Portal) and with specific provisions issued by public authorities legitimised to do so;

- d) identifying suppliers, requesting bids and evaluating them;
- e) entering into the contract;
- f) implementing the contract, managing the contractual relationship - including management of sub-suppliers, freight, etc. - and any amendments;
- g) management of litigation and debt collection procedures.

For these purposes, the processing is necessary for the implementation of the contract or of pre-contractual measures adopted at the request of the supplier (letters a, c, d, e, f), to fulfil legal obligations to which the Company is subject and to fulfil the above obligations, provided for by the "Ethics and Integrity Pact" and law (letters b, c), as well as for exercising the legitimate interest of the Data Controller (letter g).

For the purposes described above, the provision of data is optional but necessary, without it the relative purposes cannot be pursued, nor may the pre-contractual and contractual relationships commence.

### **3) Method of processing and data storage**

In the context of the Company's organisational structure, personal data shall be processed by authorised individuals acting under the authority of the Data Controller, appropriately trained by that Data Controller, mainly using electronic and manual systems in compliance with the principles applicable to personal data processing pursuant to art. 5 of the GDPR.

The aforementioned data will be stored for a period of 10 years and in any case for the time necessary to exercise the rights. This period starts from the end of the qualification validity period, or the conclusion of the contract for suppliers not subject to qualification. After such period, personal data will be processed and retained for the time necessary to pursue the purposes for which they were acquired. The period of data retention depends on the purposes for which the data are processed and may therefore vary. The following criteria are used to determine the applicable storage period: the personal data covered in this information notice shall be conserved for the time necessary (i) to manage the identification and qualification process of the supplier, (ii) to manage the contractual relationship, (iii) to enforce rights in a judicial process and (iv) for the time laid down by specific applicable laws.

The personal data necessary to meet civil and tax obligations shall also be stored thereafter, in compliance with the aforementioned obligations and in line with the storage periods laid down by the laws applicable at the time.

### **4) Disclosure, dissemination and transfer of data**

Your data may be communicated to:

- a) subjects contractually bound to the Company, such as banks and credit institutions, legal consultants, tax consultants and accountants, debt collection companies, financial risk detection and fraud prevention companies, as well as companies of the Italgas Group;
- b) third party companies (including insurance companies and insurance brokers), as data processors in relation to services provided on behalf of the Company on the basis of specific contractual agreements;
- c) public authorities and supervisory and control bodies, when this is necessary for the granting of subsidies, contributions, grants and facilities of any kind, related to the supply of products and/or provision of services, or when required by specific legal, regulatory and authorisation provisions;
- d) subjects who: carry out tasks of a technical or organisational nature on behalf of the Company; carry out data acquisition, data entry, archiving and processing services necessary for use of the services offered to customers; provide services for management of the Company's technological infrastructure; carry out activities of forwarding, packaging, transport and sorting of communications to customers; provide customer assistance; check, audit and certify the activities carried out by the Company, including in the interest of its customers, banks and credit card companies; other operators in the industry for

- management of the related relations; firms and companies within the framework of assistance and consultancy services, including legal;
- e) external companies, including foreign companies, operating in the sector of granting loans, including payment extensions, when permitted by current legislation, for the purposes of preventing and controlling the risk of insolvency and protecting credit;
  - f) Italgas Group companies, or parent, subsidiary and associated companies of the Company, for administrative-accounting management and control purposes;
  - g) persons authorised to process data or data processors, possibly designated, and to whom the Company shall issue adequate operating instructions aimed at adopting suitable security measures to guarantee the confidentiality, security and integrity of the data.

Subjects belonging to the above categories will process the data as autonomous Data Controllers or as Data Processors, pursuant to Article 28 of the GDPR, or persons authorised to process data, specifically designated by the Company.

The data shall not be disseminated in any way.

The data shall be processed in the European Union and stored on servers located within the European Union.

### **5) Rights of the data subject**

The data subject may, in relation to the data processing described herein, exercise the rights laid down in the Regulation (articles 15-22), including:

- receive confirmation of the existence of their personal data and access its content (right to access);
- update, amend and/or correct their personal data (right to rectification);
- ask for it to be deleted or to restrict the processing of data processed in breach of the law including that which need not be retained in relation to the purposes for which the data was collected or otherwise processed (the right to be forgotten and the right to restriction);
- object to the processing (right to object);
- withdraw consent, where given, without detriment to the lawfulness of the processing based on the consent given prior to withdrawal;
- lodge a complaint with the Supervisory Authority in the event of a breach of personal data protection regulations;
- receive electronic format copies of the data concerning them acquired in the context of the procurement process and ask for this data to be sent to another data controller (right to data portability).

To exercise these rights, you may contact the Head of Data Protection (hereinafter only "**Data Protection Officer**" or, in abbreviated form, "**DPO**") by sending an e-mail to [dpo.gdpr@italgas.it](mailto:dpo.gdpr@italgas.it).

### **6) Identity and contact details of the Data Controller and contact details of the Data Protection Officer**

The Data Controller is Italgas S.p.A., with registered offices in Via Carlo Bo 11, 20143 Milan, represented by the Legal Representative at the time.

The Italgas Group has appointed a Data Protection Officer who can be contacted at the e-mail address indicated in point 5, or via ordinary post at the company's registered offices.

*Information Notice last updated: September 2021*

*Amendments or additions to the information notice may be necessary in the future as a result of regulatory or business developments. The updated Information Notice is constantly available on the website [www.italgas.it](http://www.italgas.it)*