

PRIVACY NOTICE TO CUSTOMERS

Pursuant to Article 13 of EU Regulation 2016/679

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In compliance with the provisions and for the purposes of Article 13 of the European Regulation 2016/679, **TRUFFINI s REGGÈ' FARMACEUTICI S.R.L.**, in its capacity as Data Controller, through its legal representative pro tempore, hereby informs suppliers and clients about the purposes and methods of processing the collected personal data, their scope of communication and disclosure, as well as the nature of their provision.

1. COLLECTED PERSONAL DATA

- **Identification data** (company name or trade name, or full name of individuals, registered address, telephone, email, tax data, etc.);
- **Data related to economic and commercial activities** (for example, but not limited to: order collection, contracts, solvency, banking and financial data, accounting and tax data, etc.). These are provided directly by the Supplier or Client or through independent third-party Data Controllers and/or external Data Processors, such as agents, representatives, business finders, or through commercial information companies, public registers, directories, or databases regarding financial solvency, as well as Italian and foreign companies that provide services on behalf of the Controller and its subsidiaries or parent companies.
- **Contact data of personnel working for the supplier or client**, such as full name, office address, telephone, email, and tax information. These data are collected solely in execution of the existing legal relationship.

2. PURPOSES

The collected data are processed and used directly to fulfill instrumental purposes related to business activities, such as:

1. Execution of the legal relationships established or to be established and their related commitments;
2. Fulfillment of legal obligations related to these legal relationships;
3. Organizational management of any existing relationship;
4. Possible external professional collaborations for legal compliance;
5. Protection of legal transactions;
6. Institutional communications related to the existing legal relationship.

This is done in full compliance with the principles of correctness, lawfulness, purpose, and proportionality, as well as legal provisions.

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3. PROCESSING METHODS

Data processing is carried out through IT procedures, electronic means, and/or paper records by authorized internal personnel. The data are stored in paper, IT, and electronic archives with appropriate security measures as required by law.

4. COMMUNICATION AND/OR DISCLOSURE

Personal, accounting, and tax data will not be communicated, disseminated, sold, or exchanged with third parties, except for any necessary communications to third parties (e.g., consulting firms, professional firms, competent authorities, regulatory bodies for legal compliance, public administrations for institutional purposes, authorized professionals for legal and contractual matters) for activities functional to the company's structure. Any third-party use will be conducted in compliance with fairness principles and legal provisions.

No extra-EU data processing is foreseen. If required, information will be provided to the data subjects as per Article 13, paragraph 1, letter f) of EU Regulation 2016/679, in compliance with GDPR requirements.

5. CONSEQUENCES OF INCORRECT OR MISSING DATA COMMUNICATION

The Data Controller informs that any failure to provide, or incorrect communication of, mandatory information may result in the Data Controller being unable to ensure the appropriate processing in accordance with the contractual agreements.

6. DATA SUBJECT'S RIGHTS

According to Articles 15, 16, 17, 18, 20, 21, and 22 of EU Regulation 2016/679, the data subject has the right to:

Article 15 - Right of Access

The data subject has the right to obtain confirmation as to whether personal data concerning them is being processed and, if so, access to the personal data and relevant processing information.

Article 16 - Right to Rectification

The data subject has the right to obtain the correction of inaccurate personal data without undue delay. Considering the processing purposes, they also have the right to have incomplete data completed.

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Article 17 - Right to Erasure

The data subject has the right to obtain the deletion of personal data concerning them without undue delay, and the Data Controller has the obligation to delete such data.

Article 18 - Right to Restriction of Processing

The data subject has the right to restrict processing when:

- a) The accuracy of the data is contested, for the time needed to verify accuracy;
- b) Processing is unlawful, and the data subject opposes deletion, requesting limitation instead;
- c) The Data Controller no longer needs the data for processing but they are required for legal claims;
- d) The data subject has objected to processing under Article 21(1) pending verification of overriding legitimate grounds.

Article 20 - Right to Data Portability

The data subject has the right to receive their personal data in a structured, commonly used, machine-readable format and to transmit it to another Data Controller without hindrance.

Article 21 - Right to Object

The data subject may object at any time, on grounds related to their particular situation, to the processing of personal data under Article 6(1)(e) or (f), including profiling.

Article 22 - Right Not to be Subject to Automated Decision-Making

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

To exercise these rights under Articles 15 and subsequent of EU Regulation 2016/679, the data subject must write to privacy@truffini.it or send a request to the registered office at Via Privata Oslavia 18 - 20134 Milan (MI), Italy, addressed to the Data Controller.

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7. DATA CONTROLLER AND PROCESSORS

The Data Controller is **TRUFFINI s REGGÈ FARMACEUTICI S.R.L.**, headquartered at **Via Oslavia, 18 - 20134 Milan (MI), Italy**.

The updated list of external Data Processors under Article 28 of the GDPR can be consulted by submitting a written request to the Data Controller.

8. DATA RETENTION PERIOD

The data will be retained for the time necessary to fulfill the purposes stated in section 2. For accounting and tax purposes, the retention period will be **10 years** from the termination of the institutional relationship, as required by law.

G. LEGAL BASIS AND NATURE OF CONSENT

Pursuant to the contractual obligations in place, consent for processing is **not required** for points 1 to 6 of section 2, as the data is collected to fulfill legal obligations and/or execute obligations derived from the agreement between the parties.