



Società soggetta ad attività di direzione e coordinamento di  
HOLDING UMBERTO GNUTTI S.p.A.



BRAWO S.p.A.  
Via XXV Aprile, 36  
25050 Pian Camuno (BS)  
Italy

Telefono: +39 (0)364 591556  
Telefax: +39 (0)364 591407  
E-mail: info@brawo.it - Pec: brawo@postecert.it  
brawo.it

*Dear Supplier/ Customer,*

with this Information Notice, **Brawo S.p.A** (hereinafter also referred to as “Brawo”, “the Company” or “the Controller”) intends to describe, in accordance with Art. 13 of EU Regulation 2016/679 “*Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data*” (hereinafter, the EU Reg.), the management methods adopted by the Company with regard to the processing and protection of personal data provided by its suppliers and/ or customers as “*data subjects*”. In fact, the aforementioned EU Reg. requires for those who carry out the processing of personal data to inform the data subject about the processed data and the elements qualifying such processing which, in any case, must be carried out in accordance with the principles of fairness, lawfulness and transparency, protecting the personal privacy and inalienable rights of the data subject.

We therefore provide you with the following information.

#### THE DATA CONTROLLER

The Data Controller is **Brawo S.p.A.** with registered office at the address of Via XXV Aprile, 36 – 25050 Pian Camuno (Brescia) Tax Code 00483130175, VAT No. 00566320982, Tel. 0364/591556, Fax. 0364/599073.

#### TYPE OF DATA PROCESSED

The data collected by the Controller are only common personal data (e.g., personal data, company where the data subject is employed, accounting data, bank data, data relating to the sales relationship, e-mail addresses, etc.).

#### LEGAL BASIS AND PURPOSE OF THE PROCESSING

The personal data requested by the Controller are necessary for the conclusion and performance of the contract to which you are a party. In particular, your personal data may be processed for the following purposes:

- a) activities prior to the conclusion of the contract;
- b) activities related to the performance of the contract, such as processing, operational and management requirements - within the limits established by laws or regulations - necessary for the Company’s operational and administrative activities, or legal requirements related to civil, fiscal and accounting regulations, administrative management of the relationship, fulfilment of any contractual obligations, support and technical information regarding the products and services covered by the relationship;
- c) fiscal requirements, payment of the service/product supplied and application of laws and regulations in general;
- d) information, marketing, promotional and advertising activities regarding the products and services offered by Brawo;
- e) market analyses, economic/financial statistics and assessments.

#### CONSEQUENCES OF FAILURE TO PROVIDE YOUR DATA

Failure to provide data for the purposes referred to in letters a), b) and c) will make it impossible for the parties to enter into and perform the contract.

For the purposes referred to in items d) and e) above, the Supplier/Customer may, at any time, object to the processing by withdrawing the consent given, in accordance with Articles 15 and following of EU Reg. and with Art. 130 Legislative Decree 196/20013 on unsolicited communications. This, however, shall not affect the lawfulness of the processing carried out before the withdrawal/erasure.



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## DATA PROCESSING METHODS

The processing of data may be carried out with or without electronic means or automated means and shall include all the operations required by art. 4, no. 2), EU Reg. (collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, communication by transmission, dissemination or any other method of disclosure, comparison or interconnection, restriction, deletion or destruction of data) necessary for the processing in question, including communication vis-à-vis the subjects listed in the following section “*Disclosure of personal data*”.

The data shall be recorded and stored in both paper and computer filing systems, according to principles of fairness, lawfulness, transparency and with organisational systems related to the purposes of processing. Moreover, in order to protect data from destruction or loss (even accidental) and to ensure their integrity and confidentiality (including against unauthorized access or disclosure) and in general to ensure the rights of the data subject, the Controller has adopted security measures of a technical and organisational nature, in accordance with the provisions of EU Reg. (in particular by reference to Articles 24, 32 and 35).

## DISCLOSURE OF PERSONAL DATA

The personal data provided by you may be disclosed:

- within the company, to subjects authorized to process said data pursuant to art. 29 EU Reg., according to the respective profile of competence and for the purposes indicated above. These subjects include the Board of Directors as well as the Controller’s employees and/or associates, regardless of the existing relationship (e.g., temporary staff, interns, etc.) who, in order to carry out the tasks assigned to them, need to process personal data;
- to subjects external to Brawo, appointed for this purpose as Data Processors pursuant to art. 28 of EU Reg., including, as an example, tax and administrative consulting companies or trusted professionals to whom the Company has given formal authorization and professional appointment;
- to subjects who need access to your data for purposes ancillary to the relationship between you and the Controller, within the limits strictly necessary to carry out auxiliary tasks (e.g., Credit Institutions);
- to subjects who can access data by virtue of provisions of the Law or Regulations, within the limits provided for by such Laws and Regulations.

## DISSEMINATION AND TRANSFER OF DATA

Personal data for the purposes indicated above shall not be disseminated or transferred outside the territory of the European Union.

## DATA RETENTION PERIOD

The Controller shall process personal data for the time strictly necessary to fulfil the aforementioned purposes, except for that which is required for administrative-accounting purposes, i.e. for a maximum limit of 10 years for the sole purpose of fulfilling the requirements deriving from legal obligations.

## DATA STORAGE LOCATION

Your personal data shall be stored at the Controller’s operating headquarters and, in any case, within the European Union.



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### RIGHTS OF THE DATA SUBJECT

The data subject to whom the personal data refer shall have the right to request and obtain, at any time, from the Controller, access to (art. 15 EU Reg.), rectification (art. 16 EU Reg.) or deletion (right to be forgotten) (art. 17 EU Reg.) of their personal data. The Data Subject also has the right to limit the processing of their personal data (art. 18 EU Reg.), the right to data portability (art. 20 EU Reg.) as well as the right to object, on legitimate grounds, to their processing (art. 21 EU Reg.). In any event, the Data Subject shall have the right to lodge a complaint with a Supervisory Authority (Data Protection Supervisor), as provided for by Art. 77 of EU Reg., or to report any violations to the competent judicial authorities, in accordance with art. 79 of EU Reg., should they believe that the processing of personal data referred to them has been carried out in violation of the provisions of the EU Reg.

### METHODS FOR EXERCISING THE RIGHTS

The Data Subject is entitled to exercise, at any time, the rights identified above by sending an e-mail to the attention of the Internal Data Protection Officer, to the address **lfacchetti@brawo.it**, a fax to **0364/599073** or a registered letter with return receipt to Brawo S.p.A., Via XXV Aprile, n. 36, Pian Camuno (BS) - 25050

*Thank you in advance for your cooperation,*

**Brawo S.p.A.**

*(Legal Representative's Signature)*