

Notice to Economic Operators and Vendors pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

Poste Air Cargo S.r.l. - with registered office at 190 Via Europa, 00144 Rome, Italy, as Data Processor, in full compliance with Regulation (EU) 2016/679, the General Data Protection Regulation or GDPR, and Italian Legislative Decree no. 196 of 30 June 2003, as amended and supplemented by Italian Legislative Decree no. 101 of 10 August 2018, applicable personal data protection regulations, wishes to provide clear and simple information about processing the personal data of economic operators and vendors. This is without prejudice to the Data Controller's compliance with current laws on transparency and the mandatory publishing of data and documents.

Some main definitions

- **Personal data** is any information regarding an identified or identifiable natural person, or Data Subject. A natural person is considered identifiable if they can be directly or indirectly identified with particular reference to an identifier, such as their name, an ID number, data related to their location, an online identifier, or one or more distinguishing elements of their physical, physiological, genetic, psychological, economic, cultural, or social identity.
- **Processing** is any operation or set of operations performed with or without the aid of automated processes applied to personal data, such as collection, registration, organisation, structuring, storage, adaptation, modification, extraction, consultation, use, communication by transmission, publication, release, comparison, interconnection, restriction, erasure, or destruction.
- The **Data Controller** is the legal person that determines the purposes and methods of personal data processing individually or together with others.
- The **Data Processor** is the natural or legal person that processes personal data on behalf of the Data Controller.

Data protection officer

The Data Protection Officer (DPO) is responsible for personal data protection and is designated by the Data Controller to perform the functions expressly set out in the European General Data Protection Regulation.

The DPO can be contacted at the Poste Italiane Data Protection Officer's office, at Viale Europa 175, 00144 Roma, Italia, email: ufficiorpd@posteitaliane.it.

Origine dei dati personali

Poste Air Cargo S.r.l. will process the personal demographic and contact data of economic operators and vendors, namely the name, surname, tax ID number, VAT number, date and place of birth, residential address, telephone number, and email address of the legal representative and other subjects making up the corporate structure, as well as data related to circumstances declared pursuant to Article 80 of Italian Legislative Decree 50/2016. Economic operators and vendors have provided the above-mentioned data as part of service and supply contracts.

Legal basis, purpose for processing and providing personal data

The legal basis for processing is the possibility of establishing a contractual relationship and/or fulfilling precontractual requirements pursuant to Article 6.1(b) of the GDPR.

PosteAirCargo will process the personal data of economic operators and vendors to evaluate qualifications and verify the completeness and veracity of statements, information, and data provided and, where such qualifications exist and must be maintained, to manage and award service and supply contracts.

It is necessary to provide personal data for the above-mentioned purposes on the grounds that the economic operator's or vendor's refusal to do so will make it impossible to include them in the service and supply contract awarding process.

Subjects authorised to process personal data

The data processors are Poste Air Cargo S.r.l. employees and related figures materially responsible for personal data processing and authorised by the Data Controller directly or through the Delegate.

Data recipient categories

Without requiring explicit consent, Poste Air Cargo S.r.l. may disclose personal data to the following categories of subjects:

- third parties contracted to perform activities related and instrumental to personal data processing to whom it is essential to disclose such data in order to participate in service and supply contract awarding procedures;
- parties working in fields such as electronic and IT assistance and quality, systems, legal, administrative, business, tax and accounting consulting, auditing and financial control;
- parties to whom such disclosure must be made in order to comply with Italian and EU regulations.

Specifically, to meet legal requirements and manage service and supply contract awarding procedures, personal data may be disclosed to:

- Customers;
- Public administration entities.

Poste Air Cargo S.r.l. may disclose personal data to Poste Italiane S.p.A., as its Parent Company, and other Poste Italiane Group Companies for administrative/accounting purposes and without consent.

Data processing and storage

Personal data will be processed, with and without the aid of electronic devices, using organisational, physical, and logical measures appropriate to guarantee security and confidentiality according to the principles of fairness, lawfulness, and transparency. Personal data provided will be kept for the time strictly necessary to achieve the purpose for which it was collected, after which it will be deleted or destroyed.

Specifically, personal data will typically be retained for 10 years after the contractual relationship ends, except for in cases where further retention is necessary to meet regulatory requirements and/or protect rights and interests in and/or out of court.

Data subject's rights

The economic operator or vendor has the right to access the following information: the purposes for processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be disclosed (including recipients in third countries or international organisations), the expected personal data retention period or, if that is not possible, the criteria used to determine that period, the source of the personal data.

Additionally, they have the right to object to having their personal data processed and the right to:

- have their incorrect personal data corrected;
- supplement incomplete personal data;
- restrict the processing of their personal data (in this case, personal data will be processed only with consent, except for required data retention);
- erasure ("right to be forgotten");
- transfer their personal data, in other words send their personal data from one Data Controller to another, if technically feasible.

To exercise these rights, the operator or vendor can contact the Designated Data Processor Interim Head of the Operational and Legal Support Function: e-mail: posteaircargo_privacy@posteitaliane.it

Regular post: Via della Chimica 8, 00144 - Roma, Italia, c/o Responsabile p.t. della funzione Supporto Operativo e Legale

Right to lodge a complaint

If the economic operator or vendor believes that Poste Air Cargo S.r.l.'s data processing has violated the European General Data Protection Regulation, they have the right to lodge a complaint with the Italian Data Protection Authority under the terms of Art. 77 of Regulation (EU) 2016/679.

Transferring personal data to a third country

In principle, transferring personal data from EU Member States to "third" countries that do not belong to the EU is forbidden, unless the Data Controller or the Data Processor can guarantee an adequate level of protection.