

INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATING TO PROSPECTIVE SUPPLIERS AND SUPPLIERS

The following information is addressed to natural persons, including professionals, sole traders, and representatives or contact persons of companies, entities, associations, and foundations, hereinafter referred to as the "Data Subjects."

IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

Kiloutou Italia S.p.A., hereinafter also referred to as "Kiloutou" or the "Controller," with registered office at Via Postumia Ovest 101, 31048 San Biagio di Callalta (TV), can be contacted at the email address info@kiloutou.it, certified email (PEC) kiloutou@legalmail.it, or by telephone at **+39 0422 7920**.

CONTACT DETAILS OF THE DATA PROTECTION OFFICER

The Data Protection Officer may be contacted at the following email address: kiloutoudpo@unisef.it

CATEGORIES OF DATA AND THEIR SOURCE

Kiloutou processes common personal data (e.g. personal identification data, contact details, and information relating to job position). Such information may be collected directly from the data subject and/or from third parties (e.g. other employees of the same organization to which the Data Subject belongs).

PURPOSES OF PROCESSING AND LEGAL BASIS

- A. **Contract management phase:** personal data are processed for all purposes related to the management of the contractual relationship at all its stages (e.g. appointment scheduling, logistics organization, customer support activities, and compliance with legal obligations to which the Controller is subject).
- B. **Marketing:** the email address provided in the context of the contractual relationship is used to promote products or services similar to those already sold or supplied, and to carry out occasional surveys regarding the level of satisfaction with the services provided.
- C. **Protection of company assets:** personal data of individuals operating the vehicles subject to the contractual service are processed following the installation of GPS satellite tracking systems on such vehicles.
- D. **Defence purposes:** the Controller may need to process personal data for the management of disputes and for out-of-court or judicial proceedings.

Finalità	Base giuridica (dati comuni)	Base giuridica (dati particolari)
A.	The legitimate interest of the Data Controller in identifying and evaluating potential suppliers and in obtaining information and/or quotations.	/
B.	The legitimate interest of the Data Controller in the analysis and development of business strategies and policies, the identification of parties suitable for the establishment or continuation of business relationships, the assessment of payment methods and terms, and the prevention and detection of fraud.	/
C.	Legitimate interest of the Data Controller in properly managing commercial relationships in compliance with applicable law; Performance of a contract; Compliance with legal obligations	Compliance with obligations under labor law.
D.	The legitimate interest of the Data Controller in ascertaining, exercising, or defending a right	To establish, exercise, or defend a legal claim.



RETENTION PERIOD

Purpose	Retention period
A.	The time required to handle the requests submitted and any subsequent correspondence
B.	Time required to complete the inspections
C.	10 years following the termination of the contract.
D.	10 years from the final resolution of the dispute

NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL

Purpose	Nature	Consequences
A.	Required	The inability to request and obtain the information required
B.	Not applicable	/
C.	Required	The inability to establish or continue the business relationship.
D.	Require	The inability to handle the dispute

SCOPE OF DISCLOSURE

Personal data are processed by authorized internal staff assigned to specific tasks and are disclosed to external parties in accordance with the following rules.

Purpose	Categories of External Recipients
A.	Companies belonging to the same corporate group, external consultants.
B.	Companies belonging to the same corporate group, commercial information companies.
C.	Companies belonging to the same corporate group, banks, external consultants, parties to whom disclosure is required by law, business partners (customers/suppliers)..
D.	Law firms; judicial authorities.

As the data are also processed using IT systems, they may also be accessible to parties providing assistance and maintenance services for such systems

TRANSFER OF DATA TO A THIRD COUNTRY OR AN INTERNATIONAL ORGANISATION

The Data Controller does not transfer personal data outside the European Economic Area

DATA SUBJECT RIGHTS

The data subject to whom the personal data relate is granted the following rights:

- **Access:** the data subject may find out whether personal data concerning them are being processed and, if so, obtain access to such data and request a copy.
- **Rectification:** the data subject may request the updating of their personal data, the correction of inaccurate data, and the completion of incomplete data.
- **Erasure:** the data subject may obtain the deletion of their personal data where certain conditions apply (for further information, please contact the Data Controller).
- **Restriction:** the data subject may request that the data be marked in order to limit its future processing, where certain conditions apply (for further information, please contact the Data Controller).
- **Objection:** the data subject may object to the processing of personal data on grounds relating to their particular situation where the processing is based on legitimate interest or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller. The data subject may also object to the processing of personal data for direct marketing purposes.
- **Data portability:** the data subject may receive their personal data, provided to the Data Controller, in a structured format and request that such data be transmitted to another data controller, where the processing is based on consent or contract and is carried out by automated means.
- **Withdrawal of consent:** the data subject may withdraw consent for the purposes for which it was given, without affecting the lawfulness of processing based on consent before its withdrawal.

The rights that may be exercised in relation to the processing activities carried out are as follows:

Purpose	Rights that may be exercised						
	Access	Rectification	Erasure	Restriction	Objection	Data portability	Withdrawal of consent
A.	X	X	X	X	X		
B.	X	X	X	X	X		
C.	X	X	X	X	X	X	
D.	X	X	X	X	X		

To exercise the rights set out above, the data subject may use the form available at the following link: <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and submit it to the following contact address: **privacy@kiloutou.it**. The data subject may also request further details regarding the above information at the same contact address (e.g. legitimate interest balancing test or the list of data processors).

The data subject also has the right to lodge a complaint with a supervisory authority: in Italy, the Italian Data Protection Authority (www.garanteprivacy.it).