

The new European General Data Protection Regulation (GDPR) has been in force since 25 May 2018.

This new Privacy Notice explains in simpler terms the basic rules concerning how your personal data are collected, why they are processed and your rights according to the above regulation and the Italian Code set out in Legislative Decree 101/2018

It is now easier to see the data and to change your consent preferences for the different processing purposes.

A user-friendly language will be used to provide all the information concerning your personal data. This new Privacy Notice replaces the previous one and will apply to all the services that our company provides you with.

**PRIVACY NOTICE TO PROCESS THE PERSONAL DATA OF SUPPLIERS OF GOODS AND SERVICES
Provided in accordance with article 13-14 of the GDPR 2016/679 (General Data Protection Regulation)
and the subsequent Legislative Decree 101/2018**

1. Who is involved in the processing

According to the GDPR, **the Data controller** is the natural or legal person, public authority and any other organisation, association or body responsible, including in conjunction with another controller, for the decisions in terms of the purposes and methods of processing personal data and the means used, including the security profile. The Data controller is **ARIES MEDICAL srl, with registered office in Via Venezia, 105 – 31028 Vazzola (TV)** and its Legal Representative **Giampaolo Adda** undertakes to disseminate this Privacy Notice, the processing culture and the protection of the data to all stakeholders involved.

In accordance with the content of art. 37 of the GDPR points a) b) and c), the company is not obliged to designate a Data Protection Officer to monitor the compliance of personal data.

For any requests concerning your personal data and respect of your privacy you can therefore write to us directly at info@aries-online.com. An up to date list of **data handlers** and **internal** and **external data processors** is available at the registered office of the Data Controller.

Purposes of the processing. Which type of data are strictly necessary to accomplish the stated purposes:

Type of personal data The Controller processes personal identification data:

(name, surname, trading name, address, telephone number, email, bank account and payment details)

hereinafter, the **“personal data”** (or just **“data”**) provided by you voluntarily for reasons strictly connected with compliance with the regulations governing the management of supplies or that our company sources from third parties, will be used solely for:

managing contractual and pre-contractual relationships with data subjects, to comply with the supranational, national, regional and regulatory laws that govern corporate activities and if necessary, to safeguard the controller’s own legitimate interests, to do with engaging in the relationship.

The legal basis for the processing, pursuant to art. 13, paragraph 1, letter C) of EU Regulation 2016/679 – “GDPR” consists of the contractual obligations and compliance with the controller’s legal obligations.

Your personal data are processed by means of the operations stated in art. 4 no. 2) of the GDPR, more specifically:

collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure and destruction of the data.

Your personal data are processed by manual, automated and computerised means, using organisation and processing logics that are strictly connected to the purposes and in any case that will ensure the security, integrity and confidentiality of the data in compliance with the organisational, physical and logical measures prescribed by the laws in force

Your data, included in a simple database, are stored on our server, protected by a hardware firewall and centralised commercial antivirus software with individual access permitted as shown below

SERVER	access by the data handler provided with a USER NAME and PASSWORD
MAIL	access by the data handler provided with a USER NAME and PASSWORD
COMPANY MANAGEMENT SOFTWARE	access by the data handler provided with a USER NAME and PASSWORD

Description of the processing: personal data are processed lawfully, fairly and in a transparent manner in relation to the data subject. Data are processed in order to check the tax situation and conduct of suppliers and economic operators who have pre-contractual or contractual dealings with **ARIES MEDICAL srl**, in order to:

engage in preliminary activities to do with the procedures for acquiring goods, services and work; coordinate and analyse the drafting of technical, administrative and contractual documents; manage associated processes and activities (Supplier qualification and monitoring – Agreeing orders/contracts, executing the contract and engaging in any disputes). In the event of providing references, your trading name may be included in the list of partner suppliers

Persons to whom your personal data may be communicated and processing methods

Data held by **ARIES MEDICAL srl** may be divulged to: internal or external staff, appointed and trained as DATA HANDLERS or DATA PROCESSORS, limited to the information necessary to carry out their jobs; public figures to whom data must be divulged for legal obligations; third parties (natural or legal persons) who supervise the legal compliance of **ARIES MEDICAL srl**, by way of example, including but not limited to:

- Persons to whom the data must be communicated for managing the contractual relationship
- Accountancy and insurance firms
- Banks
- Company employees responsible for performing the service
- Territorial agencies and Supervisory Bodies (e.g. Labour Inspectorate, etc..)
- Trainers, Consultants and Persons who provide verification services for the company certification systems
- IT staff (internal and external) solely for essential technical needs and in any case limited to what is strictly necessary.

In certain cases, **ARIES MEDICAL srl** divulges data to third parties if it is not necessary in order to comply with legal obligations and for contractual or administrative reasons.

The recording and/or storage of personal data could become necessary in documentation regarding:

- Chamber of commerce company registration (acquired by Infocamere) and DURC

To engage in the contractual relationship there may be documents not included in the above list which is provided purely by way of example

Transfer of data: personal data are stored on servers located in the EU. It must nevertheless be understood that if it becomes necessary, the Data Controller shall have the right to move the servers outside the EU. In this case, the Controller ensures from this moment henceforth that the transfer of data outside the EU will take place in compliance with the applicable laws, after agreeing the standard contractual clauses prescribed by the European Commission.

Methods of providing the Privacy Notice and where necessary, acquiring consent-

Profiling and lawfulness criteria: The Privacy Notice may be notified at the time of inclusion in the list of suppliers for goods or services or when agreeing the contract.

Article 8 (personal data of children) Article 9 (health, biometric and judicial data):

In the processing of "supplier" data, no children's, health, biometric or judicial data is included

At the moment no communications or newsletters are contemplated and we do not engage in profiling, so no particular consent is required.

As mentioned in the previous paragraph your data, once collected and processed, are used to fulfil legal obligations that we must comply with regarding the service provided, for this reason, pursuant to article 6 of the GDPR regarding the lawfulness criteria, **the undersigned Data Controller declares that no consent will be asked for this processing.**

2. Duration of the processing and exercising your rights – articles 13 to 18 of the GDPR

Rights of the data subject: the Regulation gives all data subjects important rights; **Giampaolo Adda** is committed to ensure that these rights may be exercised as easily as possible. You are reminded that the rights assured under the Regulation include:

Access to personal data, have them rectified or erased, request an interruption to the processing, *restrict the processing of personal data or oppose it, as well as request that the data be transferred to another controller (portability).*

How to exercise a right or obtain information on your data, rectify it, delete it or request a copy

You have the right, at any time, to ask to see the personal data we hold for you and/or for it to be deleted, by writing to the email address: info@aries-online.com

Right to object: in addition, the Regulation gives anyone with the right to make a complaint to the national supervisory body which in Italy is called the "Garante per la Protezione dei Dati Personali" (www.garanteprivacy.it).

How and for how long your data will be stored

All data held by **ARIES MEDICAL srl** are stored for the time strictly necessary according to the company's needs and the applicable legal obligations.

ARIES MEDICAL srl is subject to specific data storage rules (Digital Invoicing, payment tracking, the Consolidated text of legislation and regulations on matters regarding administrative documents). All data are therefore stored for the length of time set by these regulations and then physically deleted. The time periods may vary greatly according to the type of contract and the purpose of the contract. The criteria for establishing these periods are based on the principles of common sense and on the rulings of the Supervisory Body according to which data can be generally kept for "as-long as there is a justifiable interest" i.e. they may be kept for as long as is necessary to fulfil the purposes for which they were collected and processed.

By way of mere example, if goods are purchased with a lifetime guarantee the data may be kept indefinitely, or at least until the goods are discarded.

Invoices, accounting documents and information regarding transactions are stored for 11 years in accordance with the law (including for tax purposes).

If you wish to exercise your **right to be forgotten** by making an express request that your personal data processed by the controller are deleted, you are reminded that these data will be stored, in a protected form and with limited access, solely in the interests of investigating and preventing criminal activities, for a period of no more than 12 months from the date of the request and will then be irreversibly deleted in a secure or anonymised way.

Lastly, you are reminded that for the same purposes, data regarding electronic communications traffic, but excluding the content of the communications, will be stored for a period of no more than 6 from the date of the request, pursuant to art. 24 of Law no. 167/2017, which transposed the EU Directive 2017/541 on matters of anti-terrorism.

More generally, the data must be stored in compliance with the requirements of the Italian Civil Code (art. 2220) and the European and taxation laws.

Vazzola, 26/02/2021

This document has been issued and re-examined before being published
By the Data Controller of ARIES MEDICAL srl