 SISAM WE DELIVER	file: IP 03 Information to customers and suppliers EN.docx		Ed. 2 Rev. 2 of 28.07.2025
	Sisam Agenti Srl Scali Cerere, 9 57122 Livorno	Sisam Agenti Srl Via Plateja, 12-55-A 74121 Taranto	
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INFORMATION TO CUSTOMERS AND SUPPLIERS

Sisam Agenti Srl would like to inform you that Regulation (EU) 2016/679 ("GDPR") provides for the new regulations for the protection of persons and other subjects with respect to the processing of personal data.


According to the mentioned legislation, such Processing will be based on the principles of lawfulness, fairness and transparency and protection of confidentiality and rights, according to the principles contained in art. 5 of the GDPR.

Pursuant to art. 13 GDPR, we therefore provide the following information:

DATA CONTROLLER	The Data Controller is Sisam Agenti Srl with registered office in Scali Cerere, 9 - 57122 Livorno (LI) which you can contact by writing to the following e-mail address: privacy@sisam.it .
DATA PROTECTION OFFICER (DPO)	The designated Data Protection Officer is Pratika S.r.l., (contact person Alex Stellini) who can be contacted by writing to the following e-mail address: dpo@gruppopk.com , or by calling the 0432807545.
PERSONAL DATA PROCESSED	<p>"Data" means those relating to natural persons processed by the Company for the stipulation and execution of the contractual relationship with its customers/suppliers, such as those of the legal representative of the company who signs the contract in the name and on behalf of the latter, as well as the employees/consultants of the customer/supplier, involved in the activities referred to in the contract.</p> <p>Data relating to special categories of data may also be processed in accordance with the provisions of the legislation relating to health and safety in the workplace. The Data may also include any judicial data reported in public databases.</p>
PURPOSE OF THE PROCESSING	<ul style="list-style-type: none"> • Purposes related to the establishment and execution of the contractual relationship between our Company and its customer/supplier; • Carrying out administrative-accounting obligations; • Fulfilment of obligations provided for by law, by a regulation, by EU legislation or by an order of the Authority; • Ascertain, exercise and/or defend the Company's rights in court. • Sending via e-mail, post and/or text message and/or telephone contacts, newsletters, commercial communications and/or advertising material on products or services offered by the Data Controller and detection of the degree of satisfaction with the quality of services.
DATA RETENTION PERIOD	<p>Duration of the contract, and the termination of the contractual relationship for a period of 10 years or as otherwise established by the pro tempore regulations in force. In any case, this is without prejudice to longer or specific retention periods provided for by laws and regulations applicable in the sector, or useful for the Company's possible defence in court. In the case of litigation, for the entire duration of the same, until the deadlines for appeal have been exhausted.</p> <p>For commercial communications, the data will be kept for a period of two years from the termination of the contractual relationship or until you express your disagreement.</p> <p><i>Once the above retention periods have expired, the data will be destroyed, erased or rendered anonymous, compatibly with the technical procedures of deletion and backup.</i></p>

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LEGAL BASIS OF THE PROCESSING	<p>The processing activities are necessary for the performance of a contract, i.e. they are necessary to comply with a legal obligation to which the data controller is subject. In any case, it is always possible to ask the Data Controller to clarify the concrete legal basis of each processing.</p> <p>Any commercial communications, in an already existing B2B relationship, according to the guidelines of the Guarantor Authority and the provisions of the recitals of the GDPR, fall within the legitimate interest of the Data Controller, as soft spam.</p>
PROVISION OF DATA	<p>The provision of Data is mandatory as it is strictly essential to be able to carry out the purposes specified, therefore failure to provide it will make it impossible to explain and achieve the aforementioned purposes.</p>
DATA RECIPIENTS	<p>The Data may be communicated to external parties operating as independent Data Controllers or Data Processors appointed by the Data Controller pursuant to Article 28 of the GDPR. These include, but are not limited to, public bodies; Public Authority; Consultants and service providers in various capacities.</p> <p>The complete list of Recipients and Data Processors appointed by the Data Controller is always available at the registered office of the Data Controller.</p>
PERSONS AUTHORISED TO PROCESS DATA	<p>The Data may be processed by employees of the company departments responsible for the pursuit of the purposes indicated above, who have been expressly authorized to process them and who have received adequate operating instructions.</p>
TRANSFER OF PERSONAL DATA	<p>Pursuant to art. 44 et seq. of GDPR 2016/679, some of your personal data may be communicated to recipients and Data Processors (the latter duly appointed by the Data Controller), based in non-European third countries, always according to the principles of lawfulness, fairness, transparency and protection of your privacy.</p>
RIGHTS OF THE DATA SUBJECT AND COMPLAINT	<p>With regard to personal data, the interested party may exercise the rights provided for in art. 15 et seq. GDPR and precisely:</p> <p>Right of access (art. 15) – consists in obtaining confirmation from the Data Controller as to whether or not personal data concerning him or her is being processed and, if so, obtaining access to the same data and to certain information (explained in the aforementioned article) regarding the data in question. Right to rectification (art. 16) - This consists of giving the interested party the opportunity to modify their data if they are inaccurate. Right to erasure (art. 17) - Possibility for the interested party to delete their data in the possession of the data controller when, for example, consent to processing is revoked or the purpose pursued has been achieved or when it is unlawful. Obviously, it will not always be possible to comply with the deletion request. This is the case, for example, if the data is used to comply with a legal obligation or is required for the defence of legal claims. Right to Object (art. 21) - The possibility to object to processing must be guaranteed when the legal basis is legitimate interest or the performance of a task carried out in the public interest. This right also has its limits as there may be cases in which the legitimate interest of the data controller prevails over that of the data subject, it will be essential to carry out the right balance, or the processing is necessary for a task of public interest or the establishment, defense or exercise of a right before a court. Right to portability (art. 20) – provides that, in the event that a processing is based on contract or</p>

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consent, in the event of a request, the data subject is provided with his/her personal data in a structured and machine-readable format (JSON, XML, CSV), this right applies only to data provided spontaneously and not to those inferred or derived. **Right of revocation** (art. 7) - In the event of signing any form of consent to the processing requested by the Data Controller, it should be noted that the interested party may revoke it at any time, without prejudice to the mandatory obligations provided for by current legislation at the time of the request for revocation.

You have the right to lodge a complaint with the competent supervisory authority in the Member State in which you habitually reside or work or in the State where the alleged infringement occurred.

All the aforementioned rights may be exercised by sending a specific request to the Data Controller through the contact channels indicated in this policy.