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Capitale Sociale: €2.200.000 interamente sottoscritto e versato
Iscr. N. 00113450035 del R.I. di Novara – Iscr. Al n. 68622 R.E.A. di Novara
C.F. e Part. IVA 00113450035

MODULO INF02/2026: Information on the Processing of Suppliers' Personal Data

Pursuant to Legislative Decree No. 196/2003, also known as the Italian Privacy Code, and European Regulation 2016/679, also known as the General Data Protection Regulation, hereinafter referred to as the "GDPR", Zucchetti Rubinetteria S.p.A., acting as Data Controller, provides the following information regarding the processing of personal data carried out by the Company.

a. DATA CONTROLLER (hereinafter the "Controller")

Zucchetti Rubinetteria S.p.A. - Registered office: Via Molini di Resiga 29, 28024 Gozzano (NO), Italy

i. LEGAL REPRESENTATIVE

Alessandro Ciani - CEO - privacy@zucchettidesign.it

ii. DATA CONTROLLER

Fermo Polli - Chief Financial and Administrative Officer - privacy@zucchettidesign.it

b. SUBJECT MATTER OF THE PROCESSING

The Controller processes identification data (first name and surname, address, position within the company, company email address, company landline telephone number, company mobile telephone number, company name, VAT number, Tax Identification Number) provided by the data subject.

c. PURPOSES OF THE PROCESSING

Personal data are processed:

- i. To provide support to the purchasing department in managing supplies and their respective contracts, evaluating suppliers, and managing service, maintenance, and procurement contracts.

d. METHODS AND DURATION OF THE PROCESSING

Personal data are processed through the operations referred to in Article 4 of the Italian Privacy Code and Article 4(2) of the GDPR, specifically: collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, disclosure, deletion and destruction of data.

Personal data are processed both in paper form and electronically, without automated processing.

The data are collected on a paper form from the data subject and subsequently entered into a dedicated company database accessible only to personnel authorised by the Controller.

The data are retained for a period not exceeding 20 years from the termination of the contractual relationship in force between the Controller and the data subject.

e. DATA RECIPIENTS

The data will be used by the following categories of recipients:

- i. By personnel appointed by the head of the Procurement Department for the negotiation and management of supply contracts; by the Maintenance Department for the performance of service

contracts and the management of maintenance activities; by the Reception/Security Desk for the identification of suppliers' personnel authorized to access the premises of the data controller; by the Logistics Department for organizing and receiving shipments; by the Technical Department for arranging interventions by service centers; by the Administration Department for the management of invoices, payments and any disputes; and by the Management Control Department for the preparation of statistics and cost analyses.

- ii. External entities, such as:
 - 1. The Health and Safety Manager (RSPP);
 - 2. Banks for payment services.
- iii. To further categories of third-party recipients, including consultants, customers, couriers and banking institutions, which will carry out, on behalf of the data controller, activities strictly related to the purposes set out in section c.i). A list of such recipients will be provided upon request, as specified in paragraph i).

f. DISCLOSURE OF DATA

Without the need for the data subject's express consent (pursuant to Article 24(a), (b) and (d) of the Italian Privacy Code and Article 6(b) and (c) of the GDPR), the Controller may disclose the data for the purposes referred to in Article d.i.3) to supervisory bodies, judicial authorities, as well as to any entities to which disclosure is mandatory by law for the purposes referred to in paragraph d.

The data will also be disclosed to the third-party entities referred to in the preceding paragraph.

Such entities will process the data in their capacity as independent Data Controllers.

g. RIGHTS OF THE DATA SUBJECT

The data subject is granted the following rights:

- i. **Access**
The right to obtain confirmation as to whether or not personal data concerning him/her exist, even if such data have not yet been recorded, and to have such data communicated in an intelligible form.
- ii. **Rectification**
The right to obtain the rectification, updating and, where applicable, completion of data concerning him/her.
- iii. **Erasure**
The right to obtain the erasure, from the Controller's systems, of data concerning him/her.
- iv. **Objection - Restriction of processing**
The right to object, in whole or in part, at any time, to the processing of data concerning him/her.

h. RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

Pursuant to Articles 13 and 14 of the GDPR, the data subject has the right to lodge a complaint with the competent supervisory authority in the event of alleged violations of privacy legislation and the GDPR.

i. PROCEDURE FOR EXERCISING THE DATA SUBJECT'S RIGHTS

The data subject may exercise his/her rights at any time by sending:

- an e-mail to privacy@zucchettidesign.it
- a registered letter with acknowledgement of receipt to Zucchetti Rubinetteria S.p.A. - Registered Office: Via Molini di Resiga 29, 28024 Gozzano (NO) - Italy

Gozzano, October 1st 2026