



Un'esperienza sulla quale trasportare

Clients and Suppliers – Information Notice

We inform you that, for the proper management of a supply relationship and the provision of products/services, our organization may come into possession of and process personal data, including those of your employees and collaborators. In accordance with applicable privacy and data protection regulations, namely Legislative Decree 196/2003 and EU Regulation 679/2016 (GDPR), we hereby provide the following information:

1. Data Controller

The Data Controller is **A.D.R. S.p.A.**, with registered office at Via A.M. Ceriani n.96, 21040 Uboldo (VA), Tax ID/VAT: 00637410127, contact: **privacy-adr1@adraxles.com**

2. Nature of Data Processed

For the establishment and execution of a contractual relationship, and for associated accounting and administrative activities, it is necessary to process personal data, even when the contract is signed with legal entities.

The personal data processed may include:

- Personal and contact data (e.g., email address) of individuals interacting with our organization's personnel;
- Accounting, fiscal, contractual, and financial data of the contracting party;
- Other data that may arise in the performance of the contract.

3. Purpose and Legal Basis of Processing

- **Contractual relationship management:** including fulfilling specific requests, concluding, modifying, and executing the contract, using and managing associated services, and handling complaints or disputes.

Legal basis: Art. 6(1)(b) GDPR – processing is necessary for the performance of a contract to which the data subject is a party.

- **Administrative and accounting management:** correct management of economic flows and payments.

Legal basis: Art. 6(1)(f) GDPR – processing is necessary for the legitimate interests

of the controller or third parties. Both the organization and the user are legitimately interested in ensuring proper functioning and security.

- **Compliance with legal obligations:** obligations under national or EU law, collective agreements, and regulations, including health and safety at work, anti-corruption, anti-mafia, and Legislative Decree 231/2001.

Legal basis: Art. 6(1)(c) GDPR – processing is necessary to comply with a legal obligation to which the controller is subject.

4. Recipients, Communication, and Data Disclosure

Personal data processed as described above are **not publicly disseminated**. Public dissemination refers to situations where the recipients' number and identity are unknown (e.g., publication on media).

Data may be shared with external parties acting as independent controllers, such as public or private entities legally entitled to process the data (e.g., public administrations, banks, accountants, lawyers, and other professionals).

Data may also be accessed or communicated to internal and external parties, such as:

- Personnel authorized to manage requests generated by the processing activities described above (e.g., responding to emails);
- Providers appointed under Art. 28 GDPR for managing and/or delivering website services or services related to the processing described above (e.g., software providers).

An updated list of Data Processors is available upon request.

5. Transfers Outside the EU

No data transfer outside the European Union is planned.

6. Data Retention Period

Data will be processed for the duration of the contractual relationship and, after its termination, until the statute of limitations for any mutual claims. In case of litigation, data will be retained for the duration of the dispute and until the final judgment is rendered.

7. Data Subject Rights

Under Articles 12-22 GDPR, data subjects have the right to request:

- Access to personal data
- Correction or deletion of personal data
- Restriction of processing or objection to processing

- Data portability

If processing is based on consent (Art. 6(1)(a) or Art. 9(2)(a) GDPR), the data subject has the right to **withdraw consent at any time**, without affecting the lawfulness of prior processing.

To exercise your rights or for additional information, please contact the Privacy Officer at the email address provided in point 1.

If a data subject believes their rights have been violated, they may lodge a complaint with the **Italian Data Protection Authority**.

8. Obligation or Voluntariness of Data Provision

Providing personal data is voluntary. Failure to provide data may result in partial or total inability to establish or execute contractual relationships.

9. Automated Decision-Making

No automated decision-making or profiling under Art. 22 GDPR is carried out.

10. Processing of Third-Party Data

Suppliers and/or clients are informed that, if they involve their employees or collaborators (including subcontractors) in fulfilling the contractual relationship, the personal data of such individuals may be processed by our organization as Data Controller.

These data will be processed for the same purposes, using the same methods, and retained for the same periods described in this notice. Data subjects enjoy the same rights as those outlined above.

It is the responsibility of the third-party organization to properly inform its employees and collaborators about such data processing.