



PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA – CUSTOMERS/SUPPLIERS pursuant to Article 13 of EU Regulation 2016/679 (General Data Protection Regulation – GDPR)

Dear Customer/Supplier,

Pursuant to Article 13 of EU Regulation 2016/679 (hereinafter the “Regulation”), and in relation to your personal data, our company, as Data Controller, in the context of existing contractual relationships, wishes to provide you with the following information.

1. Data Controller Identification Details

The Data Controller is **LOTUS CALZE S.r.l.**, with registered office and operational headquarters at Via Piubega 12, 46040 Ceresara (MN), Italy.

Contact details:

Phone: (+39) 0376 87624

Fax: (+39) 0376 87028

Email: contabilita@lotusexpertise.com

Since the Data Controller is established within the European Union, the appointment of a representative is not required.

2. Data Protection Officer Contact Details

Following an assessment pursuant to Article 37 of the Regulation, the appointment of a Data Protection Officer has been deemed unnecessary, as the company does not fall under any of the relevant cases.

3. Purpose and Legal Basis of the Processing

Processing is carried out for the following purposes:

- Fulfilment of legal and/or contractual obligations, customary practices, and usages related to the company's business activities;

- Accounting and administrative management;
- Management of legal obligations and disputes;
- Compliance with current occupational health and safety legislation;
- Activities related to the company's internal Management System.

The legal bases for processing include:

- Contracts for the supply/acquisition of goods or services;
- Legislative Decree 81/2008 and subsequent amendments, concerning occupational health and safety;
- Applicable provisions of the Civil Code and Criminal Code.

Processing may include: collection, recording, organization, storage, processing, modification, comparison, interconnection, selection, extraction, consultation, communication, blocking, deletion, and destruction; with or without the use of electronic means. Processing is carried out by the Data Controller's organization and by trusted companies (a list is available upon request), acting as independent data controllers, contractually obliged to comply with personal data protection regulations.

Personal data will not be publicly disclosed.

4. Legitimate Interests of the Data Controller

If processing is carried out under Article 6(1)(f) of the Regulation, it will occur solely to satisfy the legitimate interests of the Data Controller.

5. Recipients of Personal Data

Personal data collected may be communicated to:

- All entities authorized by law to access such data;
- Our collaborators within the scope of their duties;
- All natural and/or legal persons, public and/or private, when communication is necessary or functional for the performance of our business and according to the purposes outlined above.

6. Transfer of Personal Data Abroad

The Data Controller does not intend to transfer personal data to third countries or international organizations outside the European Union.

7. Data Retention Period

The retention period for personal data is based on the current legal requirement for tax-related documents, which is 10 years.

8. Data Subject Rights

The data subject has the right (under Chapter III of the Regulation) to request from the Data Controller: access to their personal data, rectification or erasure of data, restriction or objection to processing, and data portability. To exercise these rights, please refer to the contact details provided above.

9. Withdrawal of Consent

The data subject has the right to withdraw consent previously given under Article 6(1)(a) and Article 9(2)(a) of the Regulation.

10. Right to Lodge a Complaint with the Supervisory Authority

The data subject has the right to lodge a complaint with the Supervisory Authority:

Garante per la protezione dei dati personali

Piazza di Monte Citorio no. 121, 00186 Rome, Italy

Fax: (+39) 06.69677.3785

Phone: (+39) 06.696771

Email: garante@gdp.it

Certified email (PEC): protocollo@pec.gdp.it

Further details and procedures are available on the official website: <http://www.garanteprivacy.it>

11. Communication of Personal Data

The communication and subsequent processing of personal data is a necessary condition for the execution of the contract with our company. Failure to provide such data will prevent the contract from being executed.

12. Automated Decision-Making

Collected personal data will not be subjected to automated decision-making, including profiling.