

POLICY CUSTOMERS-SUPPLIERS

Dear Customers-Suppliers,

The Company **BT Fluid S.r.l.** with registered office in Via Paolo Borsellino, 3/A - Borzano di Albinea (Reggio Emilia) ITALY, the Data Controller of your personal data, pursuant to Article 13 of EU Regulation 2016/67 ("GDPR"), provides the following information regarding the personal data you have provided for **the establishment of a contractual and commercial relationship**.

BT Fluid S.r.l., as Data Controller, may process:

- personal details, tax ID number, company name, VAT number, registered office ;
- contact details of the legal representative, partners/employees and/or internal contact persons ;
- accounting data relating to the economic relationship, administrative management and payments.

Purpose and legal basis of processing

The personal data referred to above will be processed for the following purposes:

1. To perform a contractual relationship and/or pre-contractual measures as well as subsequent administrative management (administration of contracts, orders, shipments and invoices, monitoring of reliability and solvency). Therefore, the processing of your data is necessary for the performance of a contractual relationship or during the pre-contractual phase (Article 6, paragraph 1, point b) of the GDPR) and to fulfil legal obligations to which the data controller is subject (Article 6, paragraph 1, point c) of the GDPR).
2. For communication to third parties and/or recipients (such as public bodies, consultants required in order to provide services) regarding activities connected and necessary to the relationship; such communication is necessary for the performance of contractual activities, for the fulfilment of

legal obligations and for the pursuit of a legitimate interest of the data controller in relation to the organisation of the company's activities.

3. For management of litigation (breach of contract, debt collection) ; the legal basis for management of litigation is the pursuit of a legitimate interest of the data controller (Article 6, paragraph 1, point (f) of the GDPR) in enforcing its rights in court.

Special categories of data as listed in Article 9 of the GDPR are not processed.

The provision of data for contractual and legal purposes is necessary for the performance of the contractual relationship and failure to provide such data will make it impossible for the data controller to continue the relationship.

Transfer of data to third countries

No transfer of your data to non-EU countries is envisaged.

Data retention period

Your personal data are stored for the time necessary to carry out the activities related to the management of the contractual relationship and for the obligations, including legal ones, arising from it.

Recipients of the processing

The data will be processed internally by appointed persons who have been authorised to do so.

In addition, the data will be brought to the attention of the following subjects as data processors:

- the accountant, for tax advice ;
- IT companies, for hardware and software maintenance ;
- the marketing and communication consultant ;
- of the personal data protection advisor ;
- the Board of Statutory Auditors, for accounting and tax audits.

In the course of its activities and in pursuit of the above-mentioned purposes, the data controller may disclose your personal data to:

- public administration bodies, entities or authorities acting in their capacity as autonomous data controllers, to whom the data must be disclosed pursuant to legal provisions or orders of the authorities;
- suppliers of services closely related and functional to the controller's activity, such as legal advisers, transporters, banks, financial advisers and quality. In this case, the basis of legitimacy is the pursuit of a legitimate interest on the part of the controller with regard to the organisation of the business activity or the protection of his own right in court. No data is disseminated.

Rights of the data subject

The data subject shall have the right to request the controller for access to, rectification or erasure of the data, restriction of processing or to object to the processing of the data, as well as the right to data portability, under the conditions set out in Articles 15,16,17,18,20,21 of EU Regulation 2016/679.

Lastly, the data subject has the right to lodge a complaint with a supervisory authority if he/she considers that the processing concerning him/her is in breach of the European Regulation.

Identification details of the Data Controller

The data controller of your data is **BT Fluid S.r.l.** with registered office in Borzano di Albinea (Reggio Emilia) ITALY at Via Paolo Borsellino, 3/A, at the following email address: info@hydravalves.com