










**POLICY REGARDING THE PROCESSING OF PERSONAL DATA OF SUPPLIER
PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION 2016/679 (GDPR) AND NATIONAL
LEGISLATION ON PRIVACY**

	DATA PROCESSING CONTROLLER	Nextchem Tech S.p.A., Via di Vannina 88/94, 00156 Rome – Italy; Tax ID, VAT, n. 01668910662 Certified public e-mail address nextchem@pec.it (“Company”).
	DATA PROTECTION OFFICER (DPO)	The contact details of the DPO are available on the Internet website Nextchem S.p.A..

	PERSONAL DATA PROCESSED (COMMON DATA)	Data means those relating to natural persons processed by the Company for the stipulation and execution of the contractual relationship with its vendors, such as those of the legal representative of the supplier that signs the contract in the name and on behalf of the latter, as well as the employees/consultants of the supplier involved in the activities referred to in the contract. In the latter case, the source of the Data is the supplier. The Data could also include any judicial data reported in public databases.
---	--	---

	SOURCE OF DATA AND CATEGORIES OF DATA COLLECTED AT THIRD PARTIES	Data are collected from the data subject (i.e. directly provided by you) or, during the contractual relationship, acquired from third parties (for example, a company which, check the reliability of suppliers by public databases).
---	---	---

	PROCESSING PURPOSES		LEGAL BASIS OF PROCESSING		DATA RETENTION PERIOD
	Purposes related to the establishment and execution of the contractual relationship between the supplier and the Company, including: - master data management that includes a supplier database; - management of supplier qualification; - management of purchase order; - management of contract; - management of inspections and performance evaluation.		Execution of the contract for the Data of the legal representative of the Supplier Legitimate interest in the Data of the employees/consultants of the supplier involved in the activities referred to in the contract		Contractual duration and, after termination, for the period of 10 years.
	Fulfilment of administrative-accounting obligations - such as the management of accounting and treasury, as well as invoicing (for example, the verification and registration of invoices), in compliance with the requirements of current legislation.		Need to fulfil a legal obligation to which the Company is subject		Contractual duration and, after termination, for the period of 10 years.
	If necessary, to ascertain, exercise and/or defend the rights of the Company in front of the court.		Legitimate interest (defence in front of the court)		In the case of judicial litigation, for the entire duration of the same, until the exhaustion of the terms of practicability of appeals
	Purposes related to the management of internal and external controls.		Legitimate interest (Protection of the company and corporate assets. Security)		Until the end of the employment relationship and, after termination, for the period of 10 years.
	Check, through specialized companies, if the supplier is included in an international restricted list, using information in public databases.		Legitimate interest (better management of work activity)		For common data: contract duration For data relating to criminal convictions and offenses: 6 months from the moment the informative file is received
	Purposes related to ascertaining the moral suitability of the top managers of suppliers		Legitimate interest (Protection of the company and better management of work activity)		For common data: contract duration



		For data relating to criminal convictions and offenses: 6 months from the moment the informative file is received
Purposes related to the control of logical access to corporate information systems, to guarantee the security of people and goods (for example: log management, management of system administrator logs).	Legitimate interest (Protection of the company and corporate assets. Security)	2 years from the moment in which logical access was detected. 6 months for system administrator access logs
Once the retention terms indicated above have elapsed, the Data will be destroyed or made anonymous, consistent with the technical procedures for deletion and backup.		

	DATA SUPPLY
	Mandatory for the stipulation of the contract and/or its execution. The refusal to provide the Data shall therefore not allow the establishment of the contractual relationship and/or the fulfilment of the consequent obligations.

	CATEGORIES OF DATA RECIPIENTS
	The Data may be disclosed to third parties acting as data processing controllers , for example, banks and credit institutions, insurance companies, freelance (law, notary and accounting firms), supervisory and control authorities and bodies and in general public or private parties entitled to request the Data. The Data may be processed, on behalf of the controller, by external parties designated as data processors that perform specific activities on behalf of the controller, including in particular companies that deal with legal, accounting, tax and insurance obligations, manage the collections and payments, IT asset and mailing services.

	PARTIES AUTHORIZED FOR PROCESSING
	The Data may be processed by employees and collaborators of the Company belonging to departments responsible for the pursuit of the aforementioned purposes that have been expressly authorized for processing and have received adequate operating instructions.

	TRANSFER OF PERSONAL DATA IN COUNTRIES NOT BELONGING TO THE EUROPEAN UNION
	The Data will be stored in a database shared among legal entities belonging to the Maire Tecnimont Group that are also resident in non-European countries. The Data may be transferred to non-European countries to legal entities belonging to the Maire Tecnimont Group or to other subjects by virtue of a contractual or commercial relationship or for specific business requirements. Transfers are occasional for the stipulation or execution of a contract of with the Company or other natural or legal person in favour of the data subject and therefore admitted pursuant to article 49.1 c) of the GDPR.

	RIGHTS OF DATA SUBJECT - COMPLAINTS TO THE CONTROL AUTHORITY
	By contacting the Group Corporate Affairs, Governance and Compliance function via e-mail at privacy@groupmaire.com , data subjects may request the controller to provide access to the data concerning them, correct inaccurate data, integrate incomplete data, delete data and limit the processing in the cases indicated in art. 18 of the GDPR ¹ , where applicable; they may also oppose the processing of all or part of the data required for the pursuit of the controller's legitimate interest, at any time. Furthermore, if processing is based on consent or on the contract and is carried out using automated tools, the data subject shall have the right to receive the Data in a structured and commonly used format that can be read on automatic devices, and, if technically feasible, to send them to another controller without impediments. Data subjects are entitled to lodge a complaint with the competent supervisory authority.

¹ The right to limitation of the processing consists in the temporary submission of the data to the storage operation only, in the following cases provided for by art. 18 GDPR:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.