

CUSTOMERS AND SUPPLIERS' PRIVACY POLICY

Pursuant to Art. 13 Regulation (EU) 2016/679 on personal data processing

Sati S.r.l. hereby wishes to inform all customers and suppliers about the information collected and processed throughout the existing business relationship.

DATA CONTROLLER. The data controller is the company **Sati S.r.l.** (hereinafter referred to as the “**Controller**” or “**SATI**”), with registered office at via M. Galli n. 116 – 47522 Cesena (FC), e-mail address: info@satifiltri.com. In its capacity as data controller, SATI determines the means of the processing, storage and protection of personal data, pursuant to Regulation (EU) 2016/679 (GDPR) on personal data protection, as well as to d.lgs. 196/2003 (Italian Privacy Code) and its further amendments. SATI also appointed a **DPO**. You can reach out to them at the aforementioned e-mail address.

LEGAL BASES, PURPOSES, PROCESSED DATA. Each processing activity must be based on an appropriate legal basis, taking into account the purposes for which personal data is processed. The following table aims to clearly and concisely show the purposes and legal bases of the processing carried out throughout the business relationship with customers and suppliers, and the processed data.

Purpose and description of the activity	Legal basis	Processed data
First contact / lead management Prospects' requests are forwarded to the Controller's e-mail address. If the prospect shows interest in the services/products offered, a quote is prepared.	Execution of pre-contractual measures adopted by the Controller at the request of the data subject.	▪ Identification data (first name, last name of a customer/supplier or of the relevant contact person, if the customer/supplier is a legal entity); ▪ Contact details (mobile number, email of the customer/supplier or of the relevant contact person, if the customer/supplier is a legal entity, certified email/PEC); ▪ Billing information.
Customer and supplier management Once the quotation is accepted, the customer is registered in the management system by completing the personal data record. Any subsequent communications take place mostly via e-mail and phone. Finally, the process with suppliers is limited to the processing of data - possibly personal - for billing purposes.	Execution of the contract between the Controller and the data subject (customer or supplier).	▪ Identification data (first name, last name of a customer/supplier or of the relevant contact person, if the customer/supplier is a legal entity); ▪ Contact details (mobile number, email of the customer/supplier or of the relevant contact person, if the customer/supplier is a legal entity, certified email/PEC); ▪ Billing information; ▪ Bank details.
Accounting and tax compliance The accounting activities and tax obligations are performed internally and with the help of an external consultant.	Compliance with a legal obligation to which the Controller is subject, particularly of a tax nature.	▪ Billing information; ▪ Bank details.

RETENTION PERIODS.

Activity	Retention
First contact / lead management	1 year.
Customer and supplier management	10 years. However, it should be noted that since the filters produced by SATI have a very long-life cycle (around 30 years) and SATI provides its customers with after-sales technical support covering the entire life cycle of the products, it is necessary for customers' personal, billing, and order data to be retained for a longer period equal to the product life cycle, i.e., 30 years . It should also be remembered that such data largely concerns customer-legal

	entities and that the extended retention period applies to customer data and not to supplier data.
Accounting and tax compliance	10 years.

CONSEQUENCES OF FAILURE TO PROVIDE DATA. The customer or supplier is under no obligation to provide their personal data to Sati S.r.l. However, providing personal, contact, billing, and any other data relevant to the business relationship is necessary to allow the Controller to establish and perform the relationship itself. As shown in the table, no type of processing requires the data subject's consent, but **any refusal to provide such data will result in the impossibility of continuing the contractual relationship.**

RECIPIENTS AND OTHER SUBJECTS DATA IS DISCLOSED TO. Exclusively for the purposes indicated above, customers' and suppliers' data may be transmitted to: (i) **AUTHORIZED PERSONS:** these are internal figures, specifically employees of the Controller, who collect or process data according to their respective duties and assigned roles; (ii) **PROCESSORS:** these are third-party collaborators or software/applications that process data on behalf of the Controller, under a specific data processing agreement that defines the delegated operations as well as the security measures they must adopt to best protect the information obtained from the Controller. In particular, customers' and suppliers' data may be processed by: (a) the **email provider** (Gmail) – safeguards for extra-EU data transfers: standard contractual clauses and EU-US Data Privacy Framework; (b) the company providing the **corporate management software** – safeguards for extra-EU data transfers: standard contractual clauses and EU-US Data Privacy Framework; (c) the **website hosting provider** (Aruba), with data centers in the EU; (d) the company providing the **CRM software** EasyOne, with data centers in the EU (Aruba); (e) **external tax and accounting professionals** appointed by the Controller; (f) **cloud storage providers** (Microsoft 365 OneDrive) – safeguards for extra-EU data transfers: standard contractual clauses and EU-US Data Privacy Framework; (g) phone switchboard (3CX-TIM), with data center in the EU; (h) **e-mail client** (eM Client); (iii) **RECIPIENTS:** these are entities that receive personal data communications from the Controller but, following such communication, act as independent Controllers. Among these: (a) the Italian **Tax Authority, public entities, and public administrations;** (b) the **attorney** expressly appointed by the Controller; (c) the **judicial authority** and/or **public security authorities**, in cases expressly provided for by law or in the context of judicial proceedings, including for the purpose of establishing or defending a right of the Controller.

DATA SUBJECTS' RIGHTS. The data subject will always have the right to obtain from the Controller confirmation as to whether or not personal data concerning them are being processed and, if so, to gain access to the personal data and to the information referred to in Art. 15 GDPR. In addition, the data subject has the right to obtain the rectification, erasure, and restriction of the processing of their personal data held by the Controller. Finally, the data subject has the right to lodge a complaint with the supervisory authority of the Member State in which they reside/work (for Italy, the Italian Data Protection Authority) or of the place where the alleged violation occurred. To exercise these rights, simply contact the Data Controller or the DPO at the email address given above.

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