

## Privacy policy - art. 13 EU Regulation 2016/679

### CLIENTS and SUPPLIERS

PESTNET EUROPE s.r.l., as the Data Controller, hereby informs its Clients and Suppliers that Personal Data shall be processed in compliance with EU Regulation 2016/679 "General Data Protection Regulation" (hereinafter, the "GDPR").

#### 1. Data Controller

The Data Controller is PESTNET EUROPE s.r.l. in the person of its legal representative *pro tempore*, with registered office in via Morozzo della Rocca n. 3, 20123 Milano and business unit in Via Terza Strada, 12 – 35026 Conselve (PD), VAT no. 07336140962, e-mail info@pestnet-europe.com, PEC pestneteuropesrl@legalmail.it (hereinafter also "PESTNET EU" or the "Controller").

#### 2. Personal Data, Purposes, and Legal Basis for Processing

Personal Data (e.g., name and surname, company name, Tax Code/VAT No., SDI code, addresses, contact details) shall be processed by PESTNET EU solely for the following purposes:

- a) Performance of contractual and pre-contractual obligations and fulfilling all activities related to the management and execution of the contractual relationship (e.g., contract execution, administrative and accounting management, shipping, invoicing). Legal Basis: The performance of a contract to which the Data Subject is party or the execution of pre-contractual measures adopted at the request of the same (Art. 6, para. 1, letter b) GDPR).
- b) Fulfillment of tax and regulatory obligations incumbent upon the Controller. Legal Basis: compliance with a legal obligation (Art. 6, para. 1, letter c) GDPR).
- c) Protection of the Controller's rights arising from the contract. Legal Basis: the pursuit of the Controller's legitimate interest (Art. 6, para. 1, letter f) GDPR).

#### 3. Personal Data Processing Methods

The processing operations shall be carried out using electronic, IT, and paper-based tools, in compliance with the principles of lawfulness, fairness, transparency, relevance, and accuracy, with organizational and processing logics strictly related to the pursued purposes.

The data shall be protected from risks of destruction, modification, deletion, and unauthorized access through adequate physical, logical, and organizational security measures. The data may be processed, for the purposes set out in section 2, by individuals operating within the Controller's internal organizational structure, who are specifically authorized and instructed based on their respective duties, as well as by external parties designated as Data Processors pursuant to Art. 28 GDPR.

No automated profiling processes are carried out.

#### 4. Nature of Data Provision and Consequences of Non-Provision

The provision of Personal Data is necessary for pre-contractual negotiations, for the conclusion and execution of the contract, and for fulfilling legal obligations. Any refusal to provide the data, in whole or in part, may result in the impossibility of pursuing the aforementioned purposes.

#### 5. Data Retention Period

The Personal Data related to the contract will be retained for the entire duration of the contractual relationship and, subsequently, for the period required by applicable civil and tax laws, and in any case no longer than 10 years from the termination of the contractual relationship. Further retention periods are reserved, also related to the protection of the Controller's rights, where required by the legal system; subsequently, the data will be deleted or anonymized.

#### 6. Data Recipients

The Personal Data may be disclosed, for the purposes set out in section 2, to the individuals authorized to process data operating within the Controller's internal organizational structure.

The Personal Data may also be disclosed to all public and private entities whose communication is necessary to pursue the purposes set out in section 2 (e.g., legal and tax consultants of PESTNET EU, external trusted companies for the provision of services including IT services, transport companies for goods shipment, insurance companies, debt collection companies, Financial Administration, controlling company) or is required by laws or regulations, as well as in the event of requests from Public Authorities. Such entities

will operate as Data Processors, by virtue of a specific appointment, or as independent Data Controllers, depending on the purpose and type of processing carried out.

## **7. Data Subject Rights**

Pursuant to Articles 15-21 GDPR, Data Subjects have the right to:

- obtain confirmation as to whether or not personal data concerning them are being processed, and where that is the case, access to the personal data and the information referred to in Article 15 GDPR (right of access);
- obtain the rectification of inaccurate personal data without undue delay or the integration of incomplete personal data (right to rectification - Article 16 GDPR);
- obtain the erasure of personal data without undue delay (right to erasure - Article 17 GDPR);
- obtain restriction of processing (right to restriction of processing - Article 18 GDPR);
- object to processing at any time on grounds relating to their particular situation (right to object - Article 21 GDPR).

The rights can be exercised by sending a request to the following contacts:

- **PESTNET EUROPE s.r.l. - Via Terza Strada, 12 - 35026 Conselve (PD)**
- **gdprprivacy@zapi.it - PEC pestneteuropesrl@legalmail.it**

Data Subjects may lodge a complaint with the Garante per la Protezione dei dati personali (Italian Data Protection Authority) pursuant to Article 77 GDPR.