



Cogne Acciai Speciali

COGNE ACCIAI SPECIALI S.p.a.

Via Paravera, 16
I-11100 AOSTA
Tel.: +39.0165.3021
Fax :+39.0165.43779

PRIVACY POLICY REGARDING SUPPLIERS' PERSONAL DATA

In its business activities, Cogne Acciai Speciali S.p.A. (hereinafter the "**Company**"), based in Aosta, Via Paravera 16, pays the utmost attention to the security and confidentiality of the personal data of its suppliers and is the controller thereof.

Which of your personal data may be collected?

- ✓ **Contact details** – information relating to your name, address, telephone and mobile number, email address, tax code.
- ✓ **Payment data** – information relating to your payments (e.g. IBAN).
- ✓ **Use of the website** – information on how you use the website www.cogne.com, including information collected through cookies (you can find our Cookie Policy which regulates its details at the following link: <http://www.cogne.com/policy-cookie>).

How do we collect your personal data?

The Company collects and processes your personal data by virtue of the contractual or commercial relationship with you or your company. If you provide personal data on behalf of someone else, you must first ensure that the data subjects have read this Privacy Policy.

Please inform us of any changes to your data, in order to help us keep it up to date.

For what purposes can your personal data be used?

a) Establishment and performance of contractual relationships and consequent obligations.

Your data may be processed for the purpose of establishing, performing and managing existing contractual relationships, as well as to communicate with you about them. The provision of data is mandatory to manage the contractual relationship; otherwise we will not be able to proceed. Assumption for processing: fulfilment of contractual obligations.

b) Operational management and purposes strictly relating to the access to and use of the website. Your contact data and use of the website are used for the operational management (and strictly related purposes) of access to and use of the website, in order to allow you to view the products, sites, history and certifications of the company, as well as to contact you. Assumption for processing: fulfilment of contractual obligations. The provision of data is mandatory to respond to your requests; otherwise we will not be able to proceed.

c) Compliance with legally binding requests to fulfil a legal obligation, regulations or measures of the judicial authority, as well as to defend a right in court. Your data may be used to fulfil a legal obligation and/or to defend a right of the Company in court. Assumption for processing: legal obligations, which the Company is obliged to comply with.

How do we keep your personal data safe?

The Company uses various security measures in order to improve the protection and security, integrity and accessibility of your Personal Data. All your Personal Data are stored on our secure servers (or secure hard copies) or those on those of our suppliers or business partners, and are accessible and usable according to our security standards and policies (or equivalent standards for our suppliers or business partners). We also adopt



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measures including the strict restriction of access to your personal data, based on necessity and for the sole purpose communicated, and perimeter security systems to prohibit unauthorised access from the outside.

How long do we retain your data?

We retain your personal data only for as long as necessary to achieve the purposes for which they were collected or for any other related legitimate purpose. Therefore, if personal data are processed for two different purposes, we will keep such data until the purpose with the longest term ceases, but we will no longer process personal data for the purpose when the retention period has expired.

We restrict access to your personal data only to those who need to use it for relevant purposes.

Your personal data that are no longer necessary, or for which there is no longer a legal basis for their retention, are irreversibly anonymised (and thus can be stored) or securely destroyed. The retention times in relation to the different purposes listed above are indicated below:

- a) *Fulfilment of contractual obligations:* the data processed may be kept for the entire duration of the contract and in any case no longer than 10 years thereafter, in order to verify any pending issues including accounting documents (e.g. invoices).
- b) *Operational management and strictly related purposes for access to and use of the website:* the data processed may be stored for the entire duration of the contract and in any case no longer than 10 years thereafter.
- c) *In the event of disputes:* in the event that it is necessary to defend ourselves, act or even make claims against you or third parties, we may retain the personal data that we deem reasonably necessary to process for these purposes, for as long as such claim can be pursued.

With whom can we share your personal data?

Your personal data may be accessed by duly authorised employees, as well as external suppliers, appointed, if necessary, as data processors. Please contact us at the email address privacy@cogne.com if you wish to view the list of data processors and other subjects to whom we disclose your data.

Contacts

The contact details of the Company, in its capacity as controller, and of the person responsible for the protection of personal data can be found at www.cogne.com/privacy. If you have questions about our processing of your personal data, please send an email to privacy@cogne.com or contact the phone number +39 0165 3021, asking for the HR Department.

Your data protection rights and your right to lodge complaints with the supervisory authority

Under certain conditions, you have the right to ask the Company:

- ✓ for access to your personal data;
- ✓ for a copy of the personal data that you have provided (so-called portability),
- ✓ to rectify the data in our possession;
- ✓ to erase any data for which the Company no longer has any legal basis for processing;
- ✓ to object to the processing where provided for by the applicable legislation;
- ✓ to revoke your consent, in the event that the processing is based on consent;



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✓ to restrict the way in which the Company processes your personal data, within the limits provided for by current legislation.

The exercise of these rights is subject to certain exceptions aimed at safeguarding the public interest (e.g. the prevention or identification of crimes) and the interests of the Company. In the event that you exercise any of the aforementioned rights, the Company will be responsible for checking that you are entitled to exercise them, and as a rule you will receive a reply within one month.

For any complaints or reports on the methods of processing your data, the Company will make every effort to respond to your concerns. However, if you wish, you may submit your complaints or reports to the data protection authority, using the relevant contact details: Italian Data Protection Agency - Piazza di Monte Citorio no. 121 - 00186 ROME - Fax: (+39) 06.69677.3785 - Phone: (+39) 06.696771 - Email: garante@gdpd.it - Certified mail: protocollo@pec.gdpd.it.



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