

**PRIVACY NOTICE PURSUANT TO ART. 13 OF GDPR 2016/679
(European Regulation on the Protection of Personal Data)**

Dear Supplier, this notice is provided to individual suppliers and to natural persons acting on behalf of legal entity suppliers, pursuant to Art. 13 of GDPR 679/2016 (European Regulation on the Protection of Personal Data).

1) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER: The Data Controller is Comer S.r.l. – Via Oroboni, 26/28 – 27029 Vigevano (PV) – VAT No. | ax Code 00174100180 – privacy@comergroup.it

2) PURPOSES AND LEGAL BASIS OF PROCESSING:

a. Processing necessary for the performance of a contract to which the data subject is a party (Art. 6(1)(b) GDPR) Performance of obligations arising from a contract/assignment to which you are a party, or to fulfil your specific requests before and after the execution of the contract. No prior consent is required for this purpose, as the legal basis legitimising the processing is the necessity to perform a contract with you or to follow up on your specific requests.

b. Pursuit of the legitimate interests of the Data Controller (Art. 6(1)(f) GDPR) Where necessary, your data may also be processed beyond the mere fulfilment of contractual obligations, in order to safeguard our legitimate interests or those of third parties, including, by way of example, the management of disputes and access control at our premises. No prior consent is required for this purpose.

c. Compliance with a legal obligation (Art. 6(1)(c) GDPR) For purposes related to obligations under laws, regulations, and applicable rules, as well as provisions issued by Authorities and/or Supervisory and Control Bodies, and for Workplace Health and Safety on construction sites, no prior consent is required, as the legal basis legitimising the processing is the necessity to hold such personal data in order to comply with a legal obligation to which the Data Controller is subject.

3) PROCESSING METHODS: Data will be processed using both paper-based and electronic tools. We assure you that all organisational, physical, and logical measures deemed necessary and/or appropriate have been implemented to ensure the integrity, confidentiality, and availability of the data.

4) RECIPIENTS OF PERSONAL DATA: The personal data processed will not be disseminated but may be communicated to specifically identified parties. Based on their roles and job functions, internal and external staff are authorised to process data within the limits of their competences and in accordance with the instructions given by the Data Controller. The same data may be communicated to parties legally entitled to access it by virtue of laws, regulations, and applicable rules, as well as to: postal and courier services, banks and credit institutions, law firms, legal advisors, IT companies providing hardware/software maintenance and support, electronic invoicing services, web/cloud platforms, consultants, certification bodies, professional firms/companies providing accounting, fiscal, and tax services, self-employed/occasional workers, couriers, freight forwarders, clients and their cloud portals, suppliers, auditors, and entities/companies associated with or having a collaborative relationship with us.

5) DATA TRANSFERS: Personal data will be managed and stored on servers located within the European Union. Data will not be transferred outside the European Union. It is nevertheless understood that the Data Controller, where necessary, reserves the right to relocate servers within Italy and/or the European Union and/or non-EU countries, and/or to use cloud-based services. In such cases, the Data Controller hereby assures that any transfer of data outside the EU will be carried out in compliance with applicable legal provisions, concluding, where necessary, agreements ensuring an adequate level of protection and/or adopting the standard contractual clauses established by the European Commission.

6) DATA RETENTION: The Data Controller retains and processes personal data for the time strictly necessary to fulfil the stated purposes, or for the period required by current applicable regulations.

7) DATA SUBJECT'S RIGHTS AND WITHDRAWAL OF CONSENT: Pursuant to Arts. 15 et seq. of GDPR 2016/679, the data subject may exercise their rights by writing to the Data Controller at the address indicated above or by email at privacy@comergroup.it. The data subject retains the right, should they consider their rights not to have been adequately addressed, to lodge a complaint with the supervisory Authority.

8) RIGHT TO LODGE A COMPLAINT: The data subject has the right to lodge a complaint with the supervisory authority of their country of residence.

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9) AUTOMATED DECISION-MAKING: The Data Controller does not carry out any processing involving automated decision-making on the data processed.

10) PROVISION OF DATA: The provision of data for the purposes referred to in point 2) is necessary in order to fulfil your request in accordance with legal, regulatory, and normative requirements, and is a condition for the proper and effective performance of the contractual obligations undertaken. Any refusal to provide the necessary data will therefore result in the inability to fulfil the agreed contractual obligations.

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