

**Privacy policy, updated in accordance with article 13 of Regulation (EU) 2016/679  
“GENERAL DATA PROTECTION REGULATION” (“GDPR”)  
and Legislative Decree 196/2003, supplemented by Legislative Decree 101/2018**

## **CONTRACTORS / SUBCONTRACTORS**

This policy is also available on our website: [www.simic.it](http://www.simic.it).

### **1) Data Controller**

The Data Controller is SIMIC S.p.A., located in Via Vittorio Veneto snc, in Camerana (CN - 12072) – VAT number: IT02121640045, in the person of Ferruccio Boveri, legal representative.

### **2) Data Protection Officer**

The Data Controller, not falling within the cases indicated by the Art. 37 of the GDPR, nor in those indicated in the various interpretations of the Guarantor Authority, did not deem it necessary to appoint a Data Protection Officer.

### **3) Subject of data processing**

The processing concerns:

- 1) personal, identification data (e.g., name, surname, name of the company, ID card, any image of the non-graphometric signature), henceforth “personal data”, communicated by you during your visit at our Company, in addition to the times of entry and exit from our Company perimeter and our staff involved in your visit.
- 2) Pictures of you taken from the video surveillance system installed at the headquarters of the Company.
- 3) Documents related to authorizations and certificates required to carry out the work for which you have been called.

### **4) Purpose of processing, legal basis, nature of the submission**

The purposes of the processing referred to in point 3 are to protect the Company assets and the need, for security reasons, to have a record of all persons within the Company perimeter. The treatment is lawful under article 6, paragraph 1), letters c), d), f). The provision of data is mandatory, otherwise it will be impossible to access within the Company perimeter.

### **5) Methods of processing, duration of processing**

The processing of your personal data is carried out by means of the operations indicated in article 4, paragraph 2) of the GDPR, namely: collection, recording, storage, disclosure, erasure and destruction. Your personal data is subject to electronic processing. If you have had access to the perimeter of the company to load or unload goods, we inform you that the video surveillance system also records the areas of loading and unloading, for security reasons, and that a check is made to match the calendar of loads/unloads.

All data provided by you as part of the processing 3.1) will be kept for the sole year in which they were provided. At the end of the year they will be deleted. All data provided by you as part of the processing 3.2) will be kept for a period of 7 days, after which they will be overwritten. All the data you provide as part of the processing 3.3) will be used until their legal expiration and will be stored together with the employment contracts to which they refer, with a duration equal to the duration of storage of the contract itself (see the related information).

#### 6) Personal data access

Your data may be made accessible for the purposes referred to in point 4) to employees and collaborators of the Data Controller, in their capacity as executors and/or internal data processors and/or system administrators.

#### 7) Personal data disclosure

Without the need for express consent (formerly article 6 letters b), c) of the GDPR), the Data Controller may communicate your data for the purposes referred to in point 4) to supervisory bodies, judicial authorities, as well as to those persons to whom communication is required by law for the performance of these purposes. These subjects will process the data in their capacity as independent Data Controllers. Your data will not be disclosed.

#### 8) Data transfer to non-EU countries

The personal data provided, as per point 3) are stored on servers or in paper files at the Data Controller's headquarters, at Camerana (CN), within the European Union. In any case, it is understood that the Data Controller, if necessary, will have the right to move the servers even outside the EU, for example in the case of the use of Cloud services. In this case, the Data Controller hereby guarantees that the transfer of data to non-EU countries will take place in accordance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

#### 9) Rights of the data subject

As an interested party, you have the rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail:

- Right of access
- Right of rectification
- Right to erasure ("right to be forgotten")
- Right of restriction of processing
- Right to notification obligation in the event of rectification or erasure of personal data or restriction of processing
- Right to data portability
- Right to object
- Rights relating to automated individual decision-making, including profiling

#### 10) Procedures for the exercise of the rights of the data subject

You may at any time exercise your rights by sending:

- a registered letter with advice of receipt addressed to the Data Controller, as per point 1);
- an e-mail to [privacy@simic.it](mailto:privacy@simic.it).



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