Data Protection Notice for suppliers

According to the provisions of Regulation (EU) 2016/679 on Personal Data protection, pursuant to art. 13 and 14, and by Lgs. Decree No. 196/2003 - Personal Data Protection Code ("Privacy Code") as amended by Lgs. Decree 101/2018, this document is intended to provide You with all the necessary information concerning the processing of Your personal data.

DATA CONTROLLER

Pursuant to art. 4, paragraph 7, Data Controller of the processing of Your personal data is the Operating Company of Wpp Group (Italy) with which the contractual relationship is in place. Specifically, the Group consists of the Companies which are defined in the attachment.

The Agency appointed DataCo GmbH - (DataGuard) as its Data Protection Officer (DPO).

PROCESSED DATA

According to the definition given by art. 4 of the GDPR we will process, in the context of the management of the contractual relationship, the personal data categories processed by the Data Controller are:

- Identification and/or personal data (such as, for example, information relating to first name and surname);
- Contact data (such as, for example, information relating to mobile phone number and e-mail address);
- Job-related data (job title, position held);
- Accounting/financial information relating to the company (e.g. VAT number, IBAN, etc.), insofar as the Supplier is identified as a partnership;

The Data Subjects to whom the personal data refer are the Employees and/or Collaborators working in the Supplier's organization or the natural persons representing it.

PURPOSES OF THE PROCESSING

We inform you that personal data, that will be collected during the contractual relation, will be processed for the purpose and with the methods detailed below:

a) pre-contractual and contractual activities;
b) fulfilment of legal and/or regulatory obligations (e.g. tax and accounting obligations, communications to public authorities);
c) management of contractual relations and everything concerning the fulfilment of the contract or agreements in commercial, organizational, management terms for the use of the goods or services received;
d) verification of information and analysis of reliability;
e) creation and management of customer master data;

f) administrative and accounting management of contracts, including the management of invoices and payments;
g) defence of the Controller's rights in the course of judicial, administrative or extrajudicial proceedings and in the context of disputes arising in connection with the contract established between the parties;
h) for the fulfilment of the obligations deriving from the Company's participation in the WPP Group Plc., including the activities of Group financial reporting, Group coordination, internal audits, also deriving from the Company's subjection to the obligations deriving from the US Sarbanes-Oxley (SOX) regulations;
i) for the fulfilment of the obligations deriving from the Controller's adoption of certified management systems and consequently to allow the performance of inspections by the relevant Certification Bodies;
j) management of physical access to the Controller's premises (in this respect, please refer to the specific 'Visitor Information' available at the Controller's premises for further information);
k) in the context of the management of tender contracts, the personal data collected will be processed for the following specific purposes
   - verification of the regularity of contributions, salaries and fulfilments regarding safety at work
   - defence of rights in the course of judicial, administrative or extrajudicial proceedings, and in the context of disputes arising in connection with the contract between the Company and your Employer;
   - purposes connected with obligations provided for by laws, regulations or EU legislation, by provisions/requests of authorities empowered to do so by law and/or by supervisory and control bodies.

LEGAL BASIS FOR THE DATA PROCESSING

In compliance with Art. 6 of European Regulation, for the purposes a), b), c), d), e), f) and g) indicated in the previous paragraph, the processing is lawful as necessary to the execution of the contractual relation between the parties and/or for fulfillment of legal obligations.

The processing of personal data for the purposes referred to in points h), i) and j) including the related communication of data within the WPP Group and/or towards the Parent Company, is based on the legitimate interest, within the meaning of Art. 6 lit. f) of the Regulation, to protect the interests of the Controller and the WPP Group.

The processing of personal data for purposes referred to in point k) is based on legal obligations to which the data controller is subject.

DATA SOURCES

The personal data being processed may be provided directly by your company or collected from other sources.

Personal data received from third-party sources will be processed for the same purposes as those set out in this notice.

By virtue of the existing contractual relationship, the Client of the Controller undertakes to bring the content of this information notice to the attention of the Data Subject in a timely manner.

METHOD OF DATA PROCESSING

The processing of the data may consist, in addition to their collection, in their registration, storage, consultation, processing, modification, comparison, use, communication, dissemination, etc., and will take place in a lawful, correct and transparent manner, in compliance with the principles enshrined in the General Regulations on the Protection of Personal Data, guaranteeing the protection of personal data and the fundamental rights and freedoms of the Data Subjects.

The processing will be carried out both with the use of paper supports, and with the aid of IT tools, through the adoption of appropriate security measures to guarantee the protection of personal data, also in accordance with technological developments of the systems used for processing.

In accordance with a Group policy that defines the centralisation of certain ICT systems, data may be processed by other Group companies and/or at third-party infrastructures, also located in countries outside the European Union; for these systems, the WPP Group defines appropriate strategies and policies aimed at guaranteeing the highest levels of information security.

The data may also be processed under a Joint controllers agreements with other Companies of the WPP Group to which the Data Controller belongs; for further details on the agreements, please contact the Data Controller.

DATA TRANSFER OUTSIDE THE EU TRASFERIMENTO DEI DATI AL DI FUORI DELLA UE

Considering the international nature of our company, the Agency may transfer data to companies located in countries outside the European Economic Area (Third countries), including companies of WPP Group and third-party companies.

In such cases, in order to guarantee the highest level of data protection, the Company will adopt the most appropriated measures, choosing from among:

- Transfer of data to countries deemed to be adequate by the EU Commission.
- Subscription of Standard Contractual Clauses for the transfer of data outside the EU, as defined by the EU Commission, in order to guarantee a safe and legitimate transfer and subsequent processing of data outside the EU.

DATA RECIPIENTS

Data Controller identifies, based on their roles and tasks performed, individuals authorized to process personal data within the limits of their powers and in accordance with the instructions provided by the Data Controller. Without prejudice to communications carried out in compliance with legal and contractual obligations, all data collected and processed may be communicated exclusively for the purposes specified above to these entities:

- Consulting companies;
- Paper filing companies;
- Intermediaries for electronic invoicing processes;
- Substitute document storage service companies;
- Subjects performing maintenance and technical assistance activities on the Controller's IT systems;
- Public security bodies;
- Law firms;
- Credit institutions;

- Companies controlled by the Data Controller and involved in activities concerning the fulfilment of contractual obligations;
- Companies belonging to the WPP Group Plc., also established abroad, involved in activities functional to the fulfilment of contractual obligations and the performance of agreed activities;
- Companies controlling the Data Controller or in any case part of the WPP Group Plc., also established abroad (even in countries whose legislation does not guarantee a level of protection comparable to that provided for by Italian law, e.g. USA), due to the fact that the Companies belong to the WPP Group Plc. group, due to the existence of telematic and IT connections between the companies of the Group and due to coordination activities;
- Certification bodies;
- Auditing companies;
- Statutory Auditors;
- Supervisory Bodies;
- Local or foreign judicial authorities, or other competent authorities, in accordance with the provisions of the relevant legislation and only if the need or obligation to do so exists.

Persons belonging to the aforementioned categories may act as autonomous Data Controllers or as Data Processors according to appropriate agreements on the processing of personal data entered into with the Data Controller.

Further information, including a list of the subjects belonging to the aforementioned categories, is available at the Data Controller's offices.

DATA RETENTION

The data will be kept for as long as necessary to achieve the purposes for which they were collected or for any other legitimate related purposes, including compliance with rules and regulations, but in any case no longer than 10 years.

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RIGHTS OF THE DATA SUBJECTS

Pursuant to the European Regulation, the data subjects have the right to request to the Data Controller the access their personal data (Article 15), rectification (Article 16), cancellation or right to be forgotten (Article 17) , the limitation of the processing of their personal data (Article 18), the right to data portability (Article 20) or to object to their processing (Article 21), right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects that affect him/her or that significantly affects his/her person (Article 22). If the processing of personal data is based on the express consent of the interested party, pursuant to art. 7 paragraph 3 of the Rules, the subject has the possibility to withdraw his consent at any time.

The exercise of the rights listed above is free of charge and is not subject to formal constraints and may therefore be exercised using the contact details provided by the Data Controller. In the event that the Data Subject exercises any of his/her rights, it shall be the responsibility of the Data Controller to verify that the same is legitimate to exercise them and to provide feedback, as a rule, within one month.

Requests may be made against the Data Controller, sending an email to the Data Protection Officer to the address privacy@dataguard.com

The data subject also has the right to lodge a complaint with the Supervisory Authority for the protection of personal data, using the references available on the website www.garanteprivacy.it, or to take legal action (art. 77 of the Regulation) if he/she considers that the processing carried out by the Data Controller does not comply with the legislation in force on the protection of personal data.

This information notice is updated to November 2026; the Data Controller reserves the right to update it in the event of any changes to the assumptions on which the current version is based.

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