

PRIVACY NOTICE – CONTRACTUAL RELATIONSHIP

This privacy notice is to inform you about how we process your personal data for business purposes between you (as a service provider or client) and us.

This privacy notice refers to all individuals involved in contractual processes that act on behalf of the service provider, client or any other type of legal entity that we have a contract with.

In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

To be fully informed, this Privacy Notice should be read together with the Privacy Policy.

In case you need additional information, please contact us!

WHAT PERSONAL DATA DO WE PROCESS ?

For the performance of a contract, or to take prior steps with the purpose to conclude a contract with us, we usually process the following categories of personal data:

Identification and contact data:

- First name, last name;
- Email address;
- Phone number;

Professional data:

- Function;
- Workplace;
- Signature;
- Experience;
- Responsibilities, etc.

If you are our client:

- Any data originating from documentation and technical analysis.

WHY DO WE PROCESS THIS INFORMATION?

We usually process your data for the following purposes:

- **Contract management.** Personal Data is required for both sides for communicating, negotiating and concluding the Contract and ancillary documents (e.g., quotations, purchase order offers, addenda, maintenance plans, delivery notes, stats, etc.) and any other activity related to contract management.
- **Fulfilment of legal obligations.** Personal Data required to meet certain legal obligations (accounting, financial, data retention policy, mandatory disclosure to authorities, etc.).

If you are our client:

- **Project development.** Personal Data required for all the steps necessary for performing the services (e.g. meetings, organising, communication by any means, technical and structural analysis, filling in forms, documentation and questionnaires, site visits, etc.).
- **Supply of services.** Personal Data required to enable the provision of services, including sharing certain Personal Data with subcontractors (e.g. for structural analysis, and other implementation phases, which are regularly externalised to third-parties). The sets of data disclosed to subcontractors will be minimised (e.g. contact details and the office address of the Clients representative / employee to maintain direct communication between Client and Subcontractor or to enable site inspections).

WHAT ARE THE LEGAL GROUNDS THAT WE RELY ON?

The legal basis for processing your data is the performance of a **contract** between us and the Company you represent.

When the processing of personal data is required by law or is necessary for the compliance with a legal obligation, the legal basis on which rely is the compliance with our **legal obligation**;

Sometimes, we may process your data for our **legitimate interest**, as detailed in the Privacy Policy.

WHICH CATEGORIES OF THIRD PARTIES HAVE ACCESS TO YOUR DATA?

We may share your personal data with third parties that helps us in day-to day operations, as mentioned in the Privacy Policy. (e.g. IT service providers, cloud and storage service provider, financial and accounting services providers, payment processors, consultants, lawyers, legal advisers, auditors, or other similar recipients).

For getting more information about our processors, please access the ***Third-party processors privacy notice***.

HOW DO WE HANDLE THE INTERNATIONAL TRANSFER ?

The data which we collect from you is usually processed in Italy, European Union and safe countries where similar legal provisions on data protection apply.

Your data is also stored on our servers on DropBox, which is located in EU and US. Your data is sent to US under the condition mentioned in the Privacy Policy.

In the absence of a decision pursuant to Article 45(3) of GDPR regarding the data protection adequacy of US, we will ensure that you can always exercise your rights and have legal remedies against DropBox regarding the processing of your data.

For more details, please refer to the **“Where we send your data”** section from the Privacy Policy.

HOW LONG DO WE KEEP YOUR INFORMATION FOR?

Your information is kept in accordance with our data retention policy.

The criteria on the basis of which we establish data retention are:

- Legal retention periods, where appropriate;
- Contractual obligations in which you are a party, if applicable;
- PNAT's legitimate interests.

We periodically evaluate storage periods to ensure that we only keep your data for as long as necessary in relation to the intended purposes.

Erasure of your data shall only be carried out in so far as such personal data is no longer necessary for other purposes.

YOUR RIGHTS OVER YOUR INFORMATION

In order to use your personal data for the mentioned purposes, you have the following rights:

- Right to be informed;
- Right of access;
- Right to erasure ('right to be forgotten') within the limits permitted by law.
- Right to restriction of processing;
- Right to data portability to other controller, under the conditions stipulated by law;
- Right to object;
- Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- Right to lodge a complaint with a supervisory authority.

CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice will be reviewed from time to time. If we decide to change this Privacy Notice we will post the changes here. However, if we intend to make material changes to the way we use your personal data, we will notify you before doing so. Any personal data held will be governed by our most current notice.

Last update: April 2022