

PRIVACY NOTICE PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

regarding the processing of personal data of employees and collaborators of B2B customers and prospective customers, suppliers, and prospective suppliers

The European General Data Protection Regulation (EU) 2016/679 ("GDPR") lays down rules relating to the protection of natural persons with regard to the processing of personal data, as well as rules governing the free movement of such data. In accordance with the principle of transparency set out in **Article 5 of the GDPR**, please be informed that, during pre-contractual negotiations or in the course of performing a contract with its B2B customers and suppliers (hereinafter collectively referred to as the "**Business Relationship**"), **Starpool S.r.l.** processes personal data ("**Data**") relating to the legal representatives and employees/collaborators (hereinafter referred to as the "**Data Subjects**") of B2B customers/prospective customers or suppliers/prospective suppliers (hereinafter collectively referred to as the "**Business Partner**").

Accordingly, the **Data Controller** provides the **Data Subjects** with the following information regarding the processing of their **Data**. This **Privacy Notice** does not preclude the possibility that additional information regarding the processing of the **Data** may be provided to the **Data Subjects**, including through different means and at different times. For any information, questions or clarifications regarding the processing of the **Data**, or to exercise the rights granted to **Data Subjects** under the **GDPR**, the **Data Controller** may be contacted using the details provided below.

	DATA CONTROLLER	Starpool S.r.l. Tax Code/VAT No.: 01397570225 Registered office: Via Stazione 25 38030 Ziano di Fiemme (TN), Italy hereinafter referred to as the " Company " or the " Data Controller "
	DATA CONTROLLER CONTACT DETAILS	 Registered mail with return receipt to the registered office.  Email to the following address: hr@starpool.com

CATEGORIES OF PERSONAL DATA PROCESSED	PURPOSES OF THE PROCESSING	LEGAL BASIS FOR THE PROCESSING
Common personal data relating to the legal representative and the employees/collaborators of the Business Partner , including: identification data (first name and last name); contact details (telephone number and email address); and information relating to the job position or role performed .	The Data are processed for the purpose of establishing and/or performing the Business Relationship between the Data Controller and the Business Partner , with whom the Data Subject is employed or collaborates.	The processing of the Data is necessary for the purposes of the legitimate interests pursued by the Data Controller , consisting in establishing and ensuring the proper performance of the Business Relationship , pursuant to Article 6(1)(f) of the GDPR .

DATA RETENTION PERIOD. The Data will be retained for the entire duration of the Business Relationship and for ten (10) years following its termination, in accordance with the applicable civil, tax, and administrative laws. Data processed during the pre-contractual phase, prior to the execution of an agreement with the Business Partner, will be retained only for the period strictly necessary to achieve the purposes described above. Upon expiry of the applicable retention periods, the Data will be deleted or anonymized. Different retention periods may apply where required by competent authorities or where the Data Controller is involved in legal proceedings that require the processing of the Data.

	METHODS OF PROCESSING The Data are processed using both paper-based and electronic means, in compliance with the applicable data protection legislation and, in particular, with the technical and organizational measures set out in Article 32(1) of the GDPR , adopting appropriate safeguards to ensure their integrity, confidentiality, and availability . The processing activities described in this Privacy Notice are not subject to automated decision-making processes .
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CATEGORIES OF DATA RECIPIENTS

The **Data** are **not disclosed**. The **Data** are processed by individuals who have been duly authorized by the **Data Controller** and who have received specific operational instructions pursuant to **Article 29 of the GDPR**.

The **Data** may be accessed by entities outside the **Company** that process the **Data** on behalf of the **Data Controller** as **Data Processors** (e.g. data processing and IT service providers), or by entities that are entitled to process the **Data** as **independent Data Controllers** (e.g. legal advisors). The **Data Controller** informs you that the updated list of **Data Processors** appointed pursuant to **Article 28 of the GDPR** is kept at its registered office and may be made available to the **Data Subject** upon request.



SOURCE OF THE DATA AND NATURE OF THE DATA PROVISION

Depending on the circumstances, the **Data** are either provided by the **Business Partner** or collected directly from the **Data Subjects**. The provision of the **Data** is necessary for the purposes described in this **Privacy Notice**. Failure to provide the **Data** will prevent the **Data Controller** from establishing and/or properly performing the **Business Relationship**.



TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

At present, the **Data Controller** does not intend to transfer **Personal Data** to countries outside the **European Union/European Economic Area (EU/EEA)**. In any event, the **Data Controller** ensures that any such transfers will be carried out in full compliance with the conditions set out in **Chapter V of the GDPR (Articles 44 et seq.)**, so as to ensure that the level of protection afforded to natural persons under the **GDPR** is not undermined.

Accordingly, any transfer will take place either to countries that the **European Commission** has recognized as ensuring an adequate level of data protection in accordance with **Article 45 of the GDPR**, or on the basis of the **Standard Contractual Clauses (SCCs)** approved by the **European Commission** pursuant to **Article 46 of the GDPR**, provided that the recipient offers appropriate safeguards and that the **Data Subjects** are granted enforceable rights and effective legal remedies.

Any derogations from the above will be applied only in accordance with **Article 49 of the GDPR**.



DATA SUBJECT RIGHTS – COMPLAINT TO THE SUPERVISORY AUTHORITY

By sending a **registered letter with return receipt** to the **Company's registered office** or an **email** to the address indicated in the "**Data Controller Contact Details**" section, the **Data Subject** may, at any time, exercise the following rights by requesting that the **Data Controller**:

- a) provide **access** to the **Data** concerning them;
- b) **rectify** inaccurate or incomplete **Data**;
- c) **erase** the **Data**, where permitted under the **GDPR**;
- d) **restrict the processing** of the **Data**, where the conditions set out in **Article 18 of the GDPR** are met;
- e) provide the **Data** in a **structured, commonly used, and machine-readable format**, where applicable pursuant to **Article 20 of the GDPR**;
- f) **object to the processing** of the **Data**, pursuant to **Article 21 of the GDPR**.

If the **Data Subject** believes that the processing of their **Data** infringes the **GDPR**, they also have the right to lodge a complaint with the **Supervisory Authority**, which in Italy is the **Italian Data Protection Authority (Garante per la Protezione dei Dati Personali)**.