



KASTEL S.R.L.  
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## **INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATED TO RELATIONSHIPS WITH SUPPLIERS AND PROSPECTIVE SUPPLIERS**

The following information is addressed to natural persons, including professionals, sole proprietors, and representatives/contact persons of companies, entities, associations, and foundations, hereinafter referred to as the “Data Subjects”.

### Identity and contact details of the Data Controller

Kastel s.r.l., hereinafter also referred to as “Kastel” or the “Data Controller”, with registered office at Via Friuli 35–37, 31020 San Vendemiano (TV), Italy. The Data Controller may be contacted at the following e-mail address: info@kastel.it, certified e-mail (PEC): kastelsrl@pec.it, or by telephone at +39 0438 401380.

### Categories of data and their source

Kastel processes personal data of a common nature (e.g., personal identification data, contact details, identification/recognition document data, work-related data including certificates and professional qualifications) and special categories of data (e.g., data concerning fitness for work). This information may be collected from the data subject themselves and/or from third parties (e.g., other employees and collaborators of the company).

### Purposes and legal bases

**A. Management of the pre-contractual phase:** personal data are processed for all purposes related to handling requests for information and/or quotations.

**B. Management of the contractual phase:** personal data are processed for all purposes related to the management of the contractual relationship in all its phases (e.g. appointment management, logistics organization, management of customer support activities, and compliance with regulatory obligations incumbent on the Data Controller).

**C. Defensive purposes:** the Data Controller may need to process personal data for the management of disputes and out-of-court or judicial litigation.

<b>Purpose</b>	<b>Legal Basis (common data)</b>	<b>Legal basis (particular data)</b>
<b>A.</b>	Legitimate interest of the Data Controller related to conducting research on potential suppliers and collecting information and/or quotations.	/
<b>B.</b>	Legitimate interest of the Data Controller in properly managing commercial relationships in compliance with applicable law; Performance of the contract; Compliance with legal obligations.	Fulfilment of obligations under labour law.
<b>C.</b>	Legitimate interest of the Data Controller in establishing, exercising, or defending a legal claim.	To establish, exercise, or defend a legal claim.

### Retention period

<b>Purpose</b>	<b>Retention time</b>
<b>A.</b>	Time necessary to process received requests and any subsequent interactions.
<b>B.</b>	10 years from the end of the contract
<b>C.</b>	10 years from the final resolution of the dispute.

### Nature of data provision and consequences of refusal

<b>Purpose</b>	<b>Nature</b>	<b>Consequences</b>
<b>A.</b>	Necessary	Inability to receive the requested information.
<b>B.</b>	Necessary	Inability to commence or maintain commercial relations.
<b>C.</b>	Necessary	Inability to manage the dispute.



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### Scope of Communication

The data are processed by authorized internal personnel for specific tasks and are disclosed to external parties in accordance with the following rules.

Purpose	Categories of External Recipients
A.	External consultants
B.	Credit institutions, external consultants, entities to whom disclosure is mandatory by law, and commercial partners (customers/suppliers).
C.	Law firms; judicial authorities.

Since the data are also processed using IT tools, they may also be accessible to individuals providing support or maintenance for such systems.

### Transfer of data to a third country or an international organization

*The Data Controller does not transfer personal data outside the European Economic Area.*

### Rights of Data Subjects

The individual to whom the personal data relates is granted the following rights:

**Access:** You have the right to know if your personal data is being processed and, if so, to access it and request a copy.

**Rectification:** You can request the updating, correction (if inaccurate), or completion of your personal data.

**Erasure:** You may obtain the deletion of your personal data under certain conditions (for more information, contact the Controller).

**Restriction:** You can request that your data be marked to limit its future processing under certain conditions (for more information, contact the Controller).

**Objection:** You have the right to object to the processing of your personal data for reasons related to your particular situation, where the processing is based on legitimate interest or necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

**Portability:** You can receive your personal data provided to the Controller in a structured format and request that it be transmitted to another data controller, if the processing is based on consent or a contract and carried out by automated means.

**Withdrawal of Consent:** You may withdraw your consent for the purposes for which it was given, without affecting the lawfulness of processing carried out up to that point.

The rights that can be effectively exercised in relation to the processing activities carried out are:

Purpose	Exercisable rights						
	Access	Rectification	Erasure	Restriction	Objection	Portability	Withdrawal of consent
A.	X	X	X	X	X		
B.	X	X	X	X	X	X	
C.	X	X	X	X	X		

To exercise the aforementioned rights, you can use the form available at the following link:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and send it to the following address: amministrazione@kastel.it. The data subject may also request further details regarding the information provided above (e.g., balancing test of legitimate interest or the list of data processors) at the same contact.

It is also possible to lodge a complaint with a Supervisory Authority: for Italy, the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)).