



INTERNATIONAL COMMODITIES TRADING

# PRIVACY POLICY PURSUANT TO ART. 13 GDPR RELATING TO THE PROCESSING OF PERSONAL DATA OF CUSTOMERS/SUPPLIERS

The Company Impala S.r.l. (hereinafter also "the Company" or "Impala"), in its capacity as Data Controller, informs you that EU Regulation no. 2016/679 (so-called GDPR) and Legislative Decree 196/2003 as amended. regulate the protection of personal data. Impala imprints the processing of data on the principles of correctness, lawfulness, transparency and necessity, as provided for by the aforementioned legislation.

To this end, pursuant to art. 13 of the GDPR, we provide you with the following information:

#### 1. <u>IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER</u>

The Data Controller of your personal data is Impala S.r.l.:

Address: Via Marco Polo 2/A - 24062 - Costa Volpino (BG)

Tax Code/ VAT Number: 03875660981
Contact email: impalasrlmedici@pec.it

## 2. OBJECT OF THE PROCESSING

The processing we intend to carry out concerns your personal data (personal, tax and contact data), as defined by the GDPR, of which we are or will become aware by virtue of the legal relationships in place with you.

## 3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

The processing of your data has the following purposes:

- a) fulfilment of contractual and pre-contractual obligations with you;
- b) carrying out administrative and management activities, in compliance with the fulfilment of accounting, tax and any other obligation imposed by current legislation;

The purposes of the processing are based on the following lawful assumptions:

# FOR LETT. A)

Pursuant to art. 6 para. 1 lit. b) of the GDPR, the processing is lawful as it is necessary for the execution of contractual measures adopted at the request of the data subject

### FOR LETTER B)

Pursuant to art. 6 par. 1 letter c) of the GDPR, the processing is lawful for the fulfilment of the legal obligations to which the Data Controller is subject

# 4. METHODS OF PROCESSING

The processing of data may consist of their collection, recording, organization, structuring, storage, adaptation, modification, extraction, consultation, use, communication, comparison or interconnection, limitation, cancellation and destruction, in accordance with the provisions of art. 4 no. 2) of the GDPR. It can be carried out both with the use of paper support and with the aid of electronic, computer and telematic tools, according to methods and with tools suitable for guaranteeing the security and confidentiality of the data themselves. In particular, all appropriate technical and organisational data protection measures will be taken in order to comply with legal requirements and to protect the rights of data subjects.

Starting from their receipt and/or updating, the data will be stored for a period appropriate to the purposes of the processing.







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## 5. COMMUNICATION AND TRANSFER OF DATA

Your data, subject to processing, will not be disseminated; instead, for the purposes referred to in point 3, they may be communicated to third parties, including commercial partners, consultants and freelancers, banks and credit institutions, insurance companies, financial companies, leasing companies, services, credit management and recovery companies, auditors, public bodies, auditing or supervisory bodies, to comply with obligations deriving from the law, regulations, EU legislation or for aspects concerning the management and execution of the legal relationship with you that has existed or has existed.

Your data will be processed by the following subjects:

- Employees and collaborators of Impala who operate as persons authorized to process data according to the tasks performed and adequately trained.
- Data processors pursuant to art. 28 GDPR.

The list of Data Processors is available at the Company's registered office.

For all the purposes indicated in this policy, your data may also be communicated abroad, inside and outside the European Union, in compliance with the rights and guarantees provided for by current legislation.

### 6. RIGHTS OF THE DATA SUBJECT

Where the conditions are met, all the rights referred to in art. 15 ff. of the GDPR, and specifically: a) the right of access to personal data (art. 15 GDPR); b) their rectification in the event of inaccuracy (Art. 16 GDPR); c) the deletion of data (art. 17 GDPR); d) the limitation of processing (art. 18 GDPR); e) the right to data portability, i.e. to receive the personal data provided in a structured, commonly used and machine-readable format and to obtain their transfer to another Data Controller without hindrance (Article 20 of the GDPR); f) the objection to the processing (art. 21 GDPR); In the event of a violation of these provisions, the data subject has the right to lodge a complaint with the competent

Supervisory Authority (Article 77 of the GDPR).

You can exercise your rights by writing an email to <a href="ess@impala-srl.com">esg@impala-srl.com</a>.

