

EU Regulation GDPR 679/16 - Privacy and Data Processing Information

Supplier Registry Enrollment

This Privacy Notice aims to provide a comprehensive overview of the specific types of personal data and the associated processing procedures involved in the enrollment process in ITA CHICAGO's Supplier Registry.

Sources and Data Categories

In the enrollment procedure, ITA CHICAGO manages personal data submitted by applicants, which includes companies from various commercial sectors and services, as well as independent professionals. Additionally, ITA processes data obtained from public sources, such as business registries, and from authorized third parties when necessary for enrollment. The processed data primarily encompasses company information and, if provided in the Supplier Registry enrollment forms, personal data of managers and/or other personnel. Companies or professionals applying for enrollment in the Supplier Registry are subject to the information obligations outlined in Article 13 of the GDPR and the relevant US legislation concerning their employees.

Specific Relevant Data

Throughout the enrollment process, specific data, including the registration/modification of commercial licenses, certificates of membership in professional bodies, tax and insurance compliance certifications, as well as essential company information, are collected and processed.

Categories of Personal Data Collected

Throughout the enrollment process in ITA CHICAGO's Supplier Registry, specific data are collected and processed, including:

- personal and contact details of the operator (or the individuals representing it).
- documents validating the operator's compliance with social security and insurance prescriptions.
- documents attesting to the operator's presence in local business Registries.
- documents attesting the operator's presence in Registers for specific corporation.
- documents verifying the applicant's civil liability insurance for its activities.
- documents demonstrating the operator's experience in services or supplies.
- documents attesting the satisfaction of the economic operator's previous clients.

Purpose and Legal Basis of Personal Data Processing

The processing of personal data is conducted in strict adherence to the General Data Protection Regulation (GDPR) and other applicable regulations, along with the prevailing privacy legislation in the USA. In particular, the processing is carried out for/based on:

1. Fulfillment of contractual obligations (GDPR Art. 6 para. 1 letter b):
 - pre-contractual measures or initiation of the contract.
 - preparation of offers, order management, and provision of services.
 - delivery of goods and invoicing.
 - management of customer and supplier data.
2. Legal provisions (GDPR Art. 6 para. 1 letter c):
 - Personal data may be processed to comply with legal obligations, such as mandatory retention periods defined by laws and tax regulations, and to provide aggregated (anonymized) data for statistical purposes.
3. Balancing of interests (GDPR Art. 6 para. 1 letter f):
 - We process data to protect our or third parties' legitimate interests when necessary.
4. Your consent (GDPR Art. 6 para. 1 letter a, Art. 9 para. 2a in conjunction with Art. 7):
 - processing based on consent is legitimate only if you have provided explicit consent for specific purposes, and the given consent can be revoked at any time with future effect without affecting the legality of the processing carried out before the revocation.

Consent to Data Processing

To enroll in the Supplier Registry and establish, manage, or conclude a commercial relationship with ITA CHICAGO, it is imperative to provide all the requested data. Failure to provide this data may lead to refusal, non-execution, or termination of the enrollment in the Supplier Registry. The company or personal data you provide are processed based on your request, implying consent for their processing specifically for the purposes of enrollment in ITA CHICAGO's Supplier Registry.

Transmission of Data to Third Parties and Publication

As a general practice, the personal data collected is not shared with third parties. However, in adherence to Transparency and Anti-Corruption Regulations, certain information may be

published on ITA's website. On the public section of ITA CHICAGO's web site, only the following data of the companies registered in the Supplier Registry will be visible:

- progressive registration number in the Supplier Registry.
- company name.
- general contact details: address, phone, fax, email, website.
- economic sector and area of activity.

In specific situations, the data provided for enrollment in the Supplier Registry may be disclosed to designated recipients by legal obligations (e.g., judicial authorities, state agencies in Italy, and in the country where ITA CHICAGO is located).

Duration of Data Retention

The data is retained for the duration necessary to fulfill pre-contractual and legal obligations. Annual renewal registration implies the subsequent extension of the retention and processing period of personal data.

Rights of the Data Subjects according to the GDPR

We emphasize that you have the right to exercise, at any time, the rights outlined in Article 15 and subsequent articles of the EU Regulation 2016/679, specifically:

- access (Art. 15 GDPR)
- rectification (Art. 16 GDPR)
- deletion (Art. 17 GDPR)
- restriction of processing (Art. 18 GDPR)
- opposition to processing (Art. 21 GDPR).

Additionally, you have the option to file a complaint with the competent data protection supervisory authority in Italy or in the USA. For additional information, you can contact:

- ITA CHICAGO at: chicago@ice.it
- the Data Controller: ICE Agenzia, Via Liszt 21, 00144 Rome, Italy;
- the Data Protection Officer at: privacy@ice.it.