

**INFORMATION ON THE PROCESSING OF PERSONAL DATA OF SCHENKER ITALIANA  
S.P.A.'S POTENTIAL SUPPLIERS AND SUPPLIERS  
Pursuant to Article 13 of Regulation (EU) 2016/679 (the "GDPR")**

**1. Data controller: Schenker Italiana S.p.A.**

For the purposes set forth in this information notice (hereinafter the "**Information Notice**"), the data controller is the company Schenker Italiana S.p.A., with registered office in Peschiera Borromeo (MI), via F.lli Bandiera 29, Tax Code and VAT number 00916900152 (hereinafter the "**Company**", or the "**Data Controller**").

For any clarification on how personal data is processed by the Company, you may contact the Company at any time:

- by e-mail to: [privacy.it@dbschenker.com](mailto:privacy.it@dbschenker.com)
- by address: Schenker Italiana S.p.A. - Privacy Officer - via F.lli Bandiera 29 - 20068 Peschiera Borromeo (MI).

**2. Data Protection Officer: LCA Servizi S.r.l.**

The Company appointed LCA Servizi S.r.l. - a company with registered office in Milan, Via della Moscova 18, Tax Code and VAT Number 09299280967 - as Data Protection Officer pursuant to Articles 37 and the following of the GDPR (hereinafter the "**DPO**").

The DPO may be contacted at any time by email at [dpo@lcalex.it](mailto:dpo@lcalex.it).

**3. Data collected**

In the context of business development activities aimed at acquiring potential suppliers, concluding and executing the related contractual relationships with suppliers, as well as managing the data of any employees and collaborators of the data subject who may be communicated to the Data Controller for the execution of the contract (hereafter, potential suppliers and suppliers are referred to as "**Data Subjects**"), the Company may collect and process the following Data Subjects' personal data:

- (i) Data Subject's first name and surname or the Data Subject's company contact person who is contact with the Data Controller, place and date of birth, identification document (and any additional data contained therein) - if the Data Subject is a foreign natural person, data in the residence permit and passport (the "**Anagraphic Data**") are also processed;
- (ii) company address, company e-mail and certified email, company telephone number (the "**Contact Data**");
- (iii) IBAN, SDI code and bank data (the "**Bank Data**"); and
- (iv) INPS position, INAIL position and professional insurance (the "**Social Security and Insurance Data**").

together, hereinafter referred to as the "**Data**".

The Data Subject (if not an individual) undertakes to provide this Information Notice to its employees and contractors whose Data are processed by the Data Controller as part of its contractual relationship with the Data Controller.

**4. Legal basis and purpose of processing**

Data shall be processed:

- (i) to establish contact and assess the opportunity to develop commercial and, in general, business relations, and then to proceed with the initiation of the onboarding process of the Data Controller, as well as with the repetition of the onboarding process in order to determine over time the permanence of the legal requirements to be able to operate as a supplier of the Data Controller. The legal basis for the processing is the performance of the contract (with reference to carrying out the onboarding process to re-certify the presence of the legal requirements) or pre-contractual measures;
- (ii) for the management and execution of the contractual relationship with the Data Subject. The legal basis for the processing is the performance of the contract or pre-contractual measures;

- (iii) to enable the Data Controller to fulfill its legal obligations. The legal basis for the processing is a legal obligation; and
- (iv) to enable the Data Controller to defend itself in court in the event of disputes arising with the Data Subject. The legal basis for the processing is the Data Controller's legitimate interest in defending itself in court; a legitimate interest that does not cause prejudice to the Data Subjects' rights as it is necessary to guarantee the Data Controller the exercise of a constitutionally guaranteed right.

The processing of Data for the indicated purpose is compulsory and necessary for the proper execution of the above activities. Any refusal - partial or total - to provide Data for these purposes will make it impossible for the Data Controller to execute the contract relationship.

#### **5. Data notification and Data recipients**

Data shall be processed by the Data Controller and subjects designated by the Data Controller (e.g., persons in charge of IT systems management, of legal affairs, of the administrative department) may be notified to third parties only if that is necessary for the performance of the activities referred to in Paragraph 4.

Third party recipients of the Data, autonomous data controllers or data processors, are persons who perform, on behalf and in favor of the Data Controller, tasks of a technical nature (e.g., IT service providers, banks and credit institutions, insurance companies, etc.), of organizational kind or professional assistance/advice and service supply (in particular with regard to accounting and legal services).

The full list of data processors is kept at the Data Controller's registered office and may be consulted on request to be sent to the addresses specified in Paragraph 9 of this Information Notice.

The Data will not be publicly disclosed.

#### **6. Place of Data processing**

The Data shall be processed at the Company's offices and the Data shall be stored in servers and/or archives located within the European Union, or outside the European Union but exclusively in case of Data transfer to affiliates and subsidiaries companies of the DB Schenker Group for purposes related to the performance of the contractual relationship with the Data Subject. Such transfer will take place only and solely in countries that guarantee personal data protection as guaranteed by the EU law or, in any case, subject to the adoption of the measures required to ensure a standard of Data protection similar to the one guaranteed within the European Union (signing of so-called Standard Clauses as set out by the European Commission, or so-called binding corporate rules).

#### **7. Data retention period**

Data will be processed both on paper and by electronic, digital or automated media, through systems ensuring their protection, security and confidentiality.

In addition, the Data Controller has adopted specific and adequate logical, legal organizational and technical security measures to prevent Data loss, illegal or unauthorized access.

Data are processed only for the time strictly required to achieve the purposes for which they were collected. In particular - for the purpose specified in Paragraph 4, point (i) - the Data will be retained for 24 months after collection and, if the onboarding process is not initiated, will be subsequently deleted. In the event that the onboarding process is initiated but fails (so-called "reject"), the Data may be retained for a maximum period of 5 years from the time of the "reject," as this coincides with the statute of limitations for non-contractual liability. In the event that the onboarding process is successful, and the Data Subject subscribes to a contract with the Data Controller, the Data will be processed for a longer period. In particular - for the purposes set out in Paragraph 4, points (ii), (iii) and (vi) - the Data will be retained for the duration of the contractual relationship and for the statute of limitations period provided by the applicable legal provisions.

## **8. Rights of the Data Subject**

Data Subjects are holders of the rights granted by the GDPR. In particular, pursuant to Articles 12-23 of the GDPR, the Data Subjects are entitled to request and obtain, at any time, access to their personal data, information about the data processing, personal data rectification and/or update, erasure and restriction of processing. They are also entitled to object to processing and to request data portability (*i.e.* to receive their personal data in a structured, machine-readable, commonly used format). Finally, the Data Subjects are entitled to revoke their consent at any time (in any case shall not affect the lawfulness of the data processing made on the basis of consent given before its revocation) and to file any complaint to the supervisory authority (in Italy: the Garante per la Protezione dei Dati Personali).

## **9. Contact data**

The aforementioned rights may be exercised at any time, upon request to be sent to the Data Controller:

- by e-mail to: [privacy.it@dbschenker.com](mailto:privacy.it@dbschenker.com)
- by address: Schenker Italiana S.p.A. - Privacy Officer - via F.lli Bandiera 29 - 20068 Peschiera Borromeo (MI).

For further information or clarification of the rights referred to above, you may contact the Data Controller at the same addresses.