

**INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA RELATED TO CONTRACTS WITH SUPPLIERS
IN ACCORDANCE WITH EU REGULATION 2016/679 ("GDPR")**

DATA CONTROLLER: Esselunga S.p.A. ("Esselunga" or "Company")

Address: Via Giambologna n. 1, 20096, Limoto di Pioltello (MI) - e-mail: privacy@esselunga.it

DATA PROTECTION OFFICER ("DPO")

Address: DPO c/o Esselunga S.p.A., Via Giambologna n. 1, 20096, Limoto di Pioltello (MI) – e-mail: dpo@esselunga.it

What are the personal data we process and where we collect them

The term "Data" includes data on natural persons processed by the Company to agree and execute contractual relationships with Company suppliers, such as data relating to legal representatives signing contracts on behalf of suppliers, in addition to supplier employees/consultants involved in contract activities. In the latter case the supplier will be the source of the data.

How We Use Your Personal Data e what condition makes the treatment lawful	Data retention period
Purposes relating to establishing and executing the contractual relationship between the Supplier and the Company. We process the data for the execution of the contract of which the Supplier is a part, even with employees / consultants.	Duration of the contract and after completion, for 10 years.
To fulfill administration/accounting requirements, such as accounts and treasury management, invoicing (e.g. logging and checking invoices) in accordance with legislation. We process the data for the requirement to meet the Company's legal obligations.	For the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies.
If necessary to ascertain, exercise and/or safeguard Company rights in any legal proceedings. We process the data for legitimate interest.	For the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies.

Once the aforementioned retention period has lapsed the data will be destroyed or made anonymous compatibly with technical erasure and backup procedures.

Data Provision

Data must be provided to agree and/or execute the contract. Refusing to provide the Data means it will not be possible to establish the contractual relationship and/or fulfil the resulting contractual obligations.

Data Recipients

The Data may be communicated to parties operating as data controllers, such as supervisory bodies and authorities, and private or public organisations in general authorised to request data, companies belonging to the Esselunga SpA Group (Esserbella Profumerie and Bar Atlantic) for administrative accounting purposes.

The Data may also be processed, on behalf of Esselunga, by external parties designated as data processors, who perform on behalf of the owner specific activities, by way of example, companies that perform accounting and tax obligations, companies that carry out insurance activities, mail delivery company, company for the management of receipts and payments, company of the Esselunga SpA Group (Esserbella Profumerie and Atlantic Bar) for intragroup services.

Parties Authorised To Process Data

Data may be processed by employees in company departments who are responsible for carrying out the activities outlined above and have been authorised to process the Data and have received suitable operating instructions.

Data Subjects' Rights - Complaint To The Supervisory Body

By contacting the Company via e-mail sent to privacy@esselunga.it, data subjects can ask the Company for access to personal data, or the correction or deletion of personal data, and also have the right to restrict processing¹ of the data in the cases set out in article 18 of the GDPR, and object to processing in the case of legitimate interests of the controller. Furthermore, in the case where processing is based on consent or a contract and carried out with automated tools, data subjects have the right to receive the personal data in a structured, commonly used and machine-readable format, and to transmit the data to another data controller without obstruction.

Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or work, or the member state where the alleged breach took place.

¹ What is the right of restriction?

It is the temporary processing of data which consists of data conservation only, in the following cases:

- The data subject contests the accuracy of his/her personal data, for the time necessary for the controller to verify the accuracy;
- The processing is unlawful because the data subject is against his/her data erasure and requests the restriction of their use;
- The data controller no longer needs the personal data but data subject needs his/her data for court proceedings purposes;
- The data subject objects to the processing pursuant to art. 21.1 pending the verification whether the legitimate grounds of the controller override his/her legitimate grounds.