



POLICY ON THE PROCESSING OF PERSONAL DATA
Contractual Counterparties
(suppliers, customers and other entities)

1. INTRODUCTION - WHO ARE WE

Rai Com S.p.A., with registered office in Via Umberto Novaro, 18, 00195 Rome, P.IVA 12865250158 (hereinafter, “**Data Controller**” or “**Rai Com**”), as the **data controller of the processing of the personal data** of all those who, for various reasons, collaborate with the entities (hereinafter, the “**Counterparties**”) that undertake, or intend to undertake, contractual relationship with it (hereinafter, “**Data Subjects**”), hereby provides the privacy policy pursuant to Art. 13 and 14 of the EU Regulation 2016/679 of 27 April 2016 (hereinafter, “**Regulation**”, or “**Applicable Legislation**”).

If this notice is made known to the Counterparties, they undertake to make it available to their own personnel.

2. HOW TO CONTACT US? - DATA CONTROLLER AND DPO

The Data Controller takes the right to privacy and the protection of the personal data of its Data Subjects into the utmost consideration. For any information in relation to this privacy policy, Data Subjects may contact the Data Controller at any time, using the following methods:

- by sending a registered letter with return receipt to the Data Controller’s registered office in via Umberto Novaro, 18, 00195 Rome;
- by sending an e-mail to privacy.raicom@rai.it

You can also contact the Data Controller’s **Data Protection Officer (DPO)**, whose contact details are listed below: dporaicom@rai.it.

3. WHAT DO WE DO? - PURPOSE OF PROCESSING

The Data Controller collects personal data relating to the Data Subjects in connection with the activities necessary for the execution of the contract signed between Rai Com and each Counterparty.

In particular, the personal data of the Data Subjects will be lawfully processed by the Data Controller for the following purposes:

- a) **Contractual obligations and execution of the contract/service provision**: exclusively for purposes related to the existing contractual relationship and its execution. The personal data collected by the Data Controller for the purposes of the possible establishment and/or execution of the contractual relationship include: name, surname, e-mail and postal address, job title, telephone number, as well as any personal information that may have been voluntarily provided to the Data Controller for the purposes of the execution of the contractual relationship. Without prejudice to what is provided elsewhere in this privacy policy, under no circumstances shall the Data Controller make the personal data of the Data Subjects accessible to third parties;
- b) **administrative-accounting purposes**: i.e. to carry out activities of an organizational, administrative, financial and accounting nature, such as internal organizational activities and activities functional to the fulfilment of contractual and pre-contractual obligations;
- c) **legal obligations**: i.e. to comply with obligations laid down by law, by an authority, by a regulation or by European legislation (e.g. to ensure safety in the workplace or to comply with the requirements of the public contracts code, where applicable, or with those of the anti-mafia code, where applicable).

4. LEGAL BASIS

Contractual obligations and performance of the contract/provision of the service (as described in para. 3(a) above): the legal basis is Art. 6(1)(b) of the Regulation, i.e. the processing is necessary for the performance of a contract to which the Data Subject is party or for the performance of pre-contractual measures taken at his or her request.

Administrative-accounting purposes (as described in para. 3(b) above): the legal basis is Art. 6(1)(b) of the Regulation, as the processing is necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request.

Legal obligations (as described in para. 3(c) above): the legal basis is Art. 6(1)(c) of the Regulation, as the processing is necessary to comply with a legal obligation to which the Data Controller is subject.

5. PROCESSING METHODS AND DATA RETENTION PERIODS

The Data Controller shall process the personal data of the Data Subject by means of manual and computerized tools, with logic strictly related to the purposes thereof and, in any event, in such a way as to guarantee the security and confidentiality of such data.

The personal data of the data subject will be kept for the time strictly necessary to carry out the primary purposes illustrated in paragraph 3 above, or in any case as long as necessary to protect the interests of both the data subject and the Data Controller and/or other companies belonging to the same corporate group as the Data Controller determined pursuant to and for the purposes of article 2359 of the Italian Civil Code (hereinafter also referred to as the “**RAI Group**”).

The data may be obtained, as the case may be, either directly from the Data Subject (Art. 13 of the Regulation), in his capacity as representative of the Counterparty, or from the entities referred to in the introduction (Art. 14 of the Regulation).

6. SCOPE OF DATA COMMUNICATION

The Data Subject's personal data may be transferred outside the European Union, and, in this case, the Data Controller shall ensure that the transfer takes place **in accordance with the Applicable Law** and, in particular, in accordance with Articles 45 (Transfer on the basis of an adequacy decision) and 46 (Transfer subject to adequate safeguards) of the Regulation.

The personal data may be disclosed to employees and/or other collaborators of the Data Controller appointed to manage relations between the Counterparties and/or Interested Parties and the Data Controller. Such persons are formally appointed by the Data Controller to process personal data exclusively for the purposes indicated in this information notice and in compliance with the provisions of Applicable Laws.

The personal data of Data Subjects may also be disclosed to third parties who may process personal data on behalf of the Data Controller in their capacity as “Data Processors” or as autonomous data controllers, such as, by way of example

- service providers of the RAI Group (such as administrative, IT, mailing services, credit recover companies, etc.), including Rai S.p.A. itself;
- consultants (such as accountants, auditing firms, lawyers, etc.);
- companies in the same group, associated companies;
- banks and financial institutions;
- Authorities and Public Bodies;
- Hardware / server infrastructure provider;
- service provider to support booking activities (tickets and overnight stays).

The Data Controller informs Data Subjects that they have the right to obtain a list of any Data Processors appointed by the Data Controller by making a request to the Data Controller in the manner indicated in paragraph 7 below.

7. RIGHTS OF THE DATA SUBJECT

The rights guaranteed by the Applicable Law may be exercised by contacting the Data Controller in the following ways:

- by sending a registered letter with return receipt to the Data Controller's registered office in Via Umberto Novaro, 18, 00195 Rome;
- by sending an e-mail to privacy.raicom@rai.it or by contacting the DPO via the e-mail address dporaicom@rai.it.

Pursuant to the Applicable Legislation, the Data Controller informs the Data Subjects that they have the right to obtain information on (i) the source of the personal data; (ii) the purposes and methods of processing; (iii) the logic applied in the event of processing carried out with the aid of electronic instruments; (iv) the identification details of the Data Controller and the Data Processors; (v) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as Data Processors or persons in charge of processing.

Furthermore, the Data Subjects have the right to obtain:

- a) **access, update, rectify** or, where interested, **supplement** the data;
- b) the **cancellation, transformation into anonymous form** or **blocking** of data processed in breach of the law, including data whose storage is not necessary in relation to the purposes for which the data were collected or subsequently processed;
- c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

Finally, the Data Subjects have:

- d) the right to **withdraw consent** at any time if the processing is based on their consent;
- e) if applicable, the right to **data portability** (the right to receive all personal data concerning them in a structured, commonly used and machine-readable format), the right to **restriction of the processing of** personal data and the **right to erasure** ("right to be forgotten");
- f) the **right to object** in whole or in part, on legitimate grounds, to the processing of personal data concerning them, even though they are relevant to the purpose of collection;
- g) if they consider that the processing of personal data carried out by the Data Controller is in breach of the Regulation, the right to lodge a **complaint with a Supervisory Authority** (in the Member State in which they have their habitual residence, in the Member State in which they work or in the Member State in which the alleged breach occurred). The Italian Supervisory Authority is the **Garante per la protezione dei dati personali**, based in Piazza Venezia n. 11, 00187 – Rome (<http://www.garanteprivacy.it>).

The Data Controller is not responsible for updating all links displayed in this Policy, so whenever a link is not working and/or updated, Data Subjects acknowledge and accept that they should always refer to the document and/or section of the websites referred to by that link.