



## **Information on processing of personal data of customers and suppliers in compliance with Article 13 of the EU Regulation 2016/679 (GDPR)**

With this document (“**Information**”), the Data Controller, as defined below, intends to communicate the purposes and methods regarding the processing of personal data provided by you, or otherwise acquired as part of our activities, in compliance with Article 13 of the Regulation (EU) 2016/679, (“**GDPR**”).

### **DATA CONTROLLER**

The Data Controller, pursuant to Art. 4 - GDPR, is **O-I Italy S.p.A. ('O-I')**, with registered office in Origgio, via 1° Maggio n. 18, tax code n. 00059020057, VAT no. I1991790152, certified e-mail (pec): [o-i.italy@legalmail.it](mailto:o-i.italy@legalmail.it)

### **PERSONAL DATA PROCESSED**

The Controller will process only the personal data strictly necessary to achieve the Purposes, as defined below. O-I may, in particular, process personal and identification data (e.g. first name, last name, tax code or other identification number), contact data (e.g. residential address, telephone number, e-mail address and certified e-mail address), in general any other data and information necessary for the conclusion and execution of the contract (e.g. VAT number, IBAN).

### **FINALITÀ DEL TRATTAMENTO**

Personal data will be processed in the context of O-I's activities for the following purposes (“**Purposes**”):

- 1) management of pre-contractual requirements;
- 2) management and execution of the contractual relationship with consequent fulfilment of the related legal obligations;
- 3) administrative management, such as invoicing and order management;
- 4) exercise of the Data Controller's rights, such as the right of defence in court, or in the event of any judicial and extrajudicial disputes;
- 5) management of collections, payments and communications to and from credit, financial and insurance institutions;
- 6) filing of documents as required by current legislation;
- 7) processing of statistics, management control, industrial accounting.

Data subjects (“**Data Subject(s)**”) are natural persons such as directors, employees and collaborators working on behalf of the supplier or customer company, as well as consultants and freelancers.

### **LEGAL BASIS OF THE PROCESSING AND NATURE OF THE PROVISION OF PERSONAL DATA**

The provision of the data is optional, however, not providing the data and/or expressly refusing to process the data will make it impossible for the Data Controller to continue the contractual relationship between the parties. The legal basis for the processing of personal data is represented by:

- compliance with contractual and pre-contractual obligations as per Art. 6 GDPR par. 1 b), for the Purposes referred to in point 1) 2) 3) 5) 7) above-mentioned;
- pursuing a legitimate interest of the Data Controller as per Art. 6 GDPR par. 1 c), for the Purposes referred to in point 4) above-mentioned;
- compliance with legal obligations by the Data Controller as per art. 6 GDPR par. 1 f) for the Purposes referred to in point 6) above-mentioned.

The Purposes are part of the legal/economic execution of the contractual relationship, therefore, the consent of the data subject is not required for the processing of the data.

### **MODALITIES OF TREATMENT**

The data will be processed in accordance with the GDPR, the Italian Privacy Code and the provisions of the Data Protection Authorities. The processing will be based on the principles of correctness, lawfulness, transparency, and protection of the confidentiality and rights of the data subject.

The data will be processed using automated and manual, digital and printed tools, with logic strictly related to the purposes of processing and, in any case, using methods and procedures that guarantee the security and confidentiality of the data.

The processing may be carried out by third parties, duly appointed for this purpose, who provide specific processing, administrative or instrumental services necessary for the achievement of the above purposes.



## RETENTION PERIOD

The Data Controller will only use your personal data for as long as is necessary for the management and execution of the obligations assumed, as well as for the fulfilment of the legal obligations laid down by law, respecting the principles of storage limitation and minimization.

Personal data will be kept for a maximum period of 10 years from the end of the contractual relationship, in compliance with the statute of limitations provided for by the Italian civil code. The deletion of personal data from the archives may be suspended if expressly requested in accordance with the law or if deemed appropriate to prevent complaints or possible legal action.

## RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA

For the pursuit of the purposes described in this information notice, your personal data will be disclosed to employees, assimilated personnel and collaborators of the Controller, who will act as persons authorized to process personal data.

In addition, your personal data will be processed by third parties belonging to the following categories:

- 1) O-I Group companies;
- 2) parties which, for different reasons, the Data Controller uses for the performance of the contract;
- 3) companies managing the Data Controller's computer system;
- 4) parties that manage administrative and tax fulfilments for the Data Controller;
- 5) companies and consultants providing legal services;
- 6) authorities and supervisory and control bodies, and in general public or private entities with public functions.

Subjects belonging to the above categories act, in some cases, in total autonomy as distinct Data Controllers, in other cases, as Data Controllers specifically appointed by the Data Controller in compliance with Article 28 of the GDPR.

A complete and up-to-date list of the parties to whom your personal data may be disclosed can be obtained from the Data Controller's registered office.

## TRANSFER OF DATA TO THIRD PARTIES

In the context and for the purposes of the processing, in particular with regard to the hosting of data and IT support, some personal data may be transferred to other companies of the O-I Group or third parties, in countries both within and outside the European Union. This specifically includes countries whose level of protection of your personal data may differ from the one provided within the European Union. Should this be the case, any transfer of data to countries outside the European Union will, in any event, take place in accordance with appropriate and adequate safeguards for the purposes of such transfer, such as standard contractual data protection clauses, pursuant to applicable law and, in particular, Articles 44, 45 and 46 of the GDPR. We may authorize and instruct third parties to process data on our behalf. In this case, the necessary technical and organizational measures will be taken to ensure protection in accordance with Article 28 of EU Reg. 679/2016. Your personal data are not subject to dissemination.

## RIGHT OF DATA SUBJECT

The data subject may assert his/her rights as expressed in Art. 15 et seq. GDPR, by contacting the Data Controller at the contacts indicated above. Pursuant to the current data protection legislation, the Data Subject has the right to request access of his/her personal data (Art. 15 GDPR), rectification of his/her personal data (Art. 16 GDPR), deletion of his/her personal data (Art. 17 GDPR), restriction of the purpose of the processing of his/her personal data (Art. 18 GDPR), portability of his/her personal data and request to object to the processing of his/her personal data (Art. 20 and 21 GDPR). Please keep in mind that the above rights may be restricted by national data protection legislation.

For the purpose of exercising the rights referred to in the preceding paragraph, as well as for any clarifications, Interested Parties may contact the Company at the following email address [privacy.it@o-i.com](mailto:privacy.it@o-i.com).

In the event that it is believed that the processing of personal data carried out by the Data Controller is in violation of the provisions of the GDPR, the Data Subject has the right to lodge a complaint with the Data Protection Authority, following the procedures and directions published on its official website ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

THE DATA CONTROLLER