

KNORR-BREMSE
Sistemi per Autoveicoli Commerciali S.p.A.

Privacy Notice - Articles 13 and 14 of Regulation (EU) 2016/679
Full privacy notice for Suppliers

Who are we and how do we use your personal data?

Knorr-Bremse Sistemi per Autoveicoli Commerciali S.p.A., with registered office in (20862) Arcore (MB), Via Alessandro Polini, 158, (hereinafter also the "Controller"), in its capacity of controller, takes care of the confidentiality of your personal data and of ensuring they are protected against any event that might expose them to the risk of breach.

The Controller implements policies and practices that pay attention to the collection and use of personal data and to the exercise of your rights granted by the applicable regulation. The Controller updates the policies and practices adopted thereby to protect personal data whenever necessary and in any event in case of regulatory and organizational changes that may impact the processing of your personal data.

How and why does Knorr-Bremse S.A.C. S.p.A. collect and process your data?

The Controller collects and/or receives data concerning you, such as your:

- name and surname;
- VAT number and tax code;
- place and date of birth;
- physical address and email;
- landline and/or mobile phone number;
- current account number/IBAN;
- IT data (access logs, IP addresses, etc.) deriving from the activities performed for the Controller (e.g. for the management of platforms, HW and SW applications and/or infrastructures pertaining to the Controller, also for their maintenance) and/or from the use of platforms pertaining to the Controller, which suppliers are authorized to use;
- data relating to your professional and/or commercial activity.

Your personal data will be processed:

1) for the management of the contractual relationship of supply and the ensuing obligations, including statutory obligations

Purposes	Legal basis
- to manage the contractual relationship throughout all its stages, from the negotiations to contract termination, whatever its cause	Performance of contractual and pre-contractual activities
- to monitor and update the conditions of supply and/or services and duties	Performance of statutory and contractual obligations and of obligations arising from the relationship, including those deriving from:
- to record, invoice and keep accounts	- Presidential Decree no. 633/1972 as amended and supplemented - Presidential Decree no. 600/1972 as amended and supplemented
	Performance of economic-financial and social reporting obligations



Your data may be collected also from third parties including, but not only:

- other controllers;
- providers of electronic communication services;

and your data may be obtained by consulting:

- lists held by public entities or similar entities or under the control of public authorities in accordance with specific national regulations;

2) for their communication to third parties and for their dissemination

Purposes	Legal basis
communication to third parties such as: - the companies of the Group which the Controller belongs to, for administrative-accounting purposes; - public entities for the purpose of compliance with statutory obligations, and third-party subjects and companies, such as banks, credit institutes and companies strictly connected with debt collection; - legal and industrial advisors, auditors; subjects providing administrative and contractual advice; - third-party supply and technical/IT support companies.	Performance of contractual and pre-contractual activities. Performance of obligations arising from the contract. Performance of statutory obligations, including those deriving from: - Presidential Decree no. 633/1972 as amended and supplemented - Presidential Decree no. 600/1972 Performance of transparency obligations and of economic-financial and social reporting obligations.

Data communication and dissemination concern categories of data whose transmission and/or disclosure are necessary for the performance of the activities and the pursuit of the purposes of the Controller in the management of the relationship. Their processing does not require the data subject's consent if processing takes place for statutory obligations or to perform obligations deriving from the contractual relationship or where any other cause of exclusion applies (processing based on the Controller's legitimate interest, expressly established also for the correct application of current legislation and applicable regulations, or also through third parties identified as processors).

3) for IT security activities

Purposes	Legal basis
- to control and monitor services published online and on the platforms pertaining to the Controller and made available to you also by reason of the activities performed on the Controller's behalf (access to restricted area, websites, email account, administration of systems used, etc.) - to implement procedures for the identification and notification of personal data breaches	Performance of activities connected with the relationship Performance of statutory obligations (identification and notification of data breaches) Legitimate interest

How and where are your data stored and for how long?

How

Data are processed by specifically authorized internal staff, using paper supports or computer procedures. These staff members are authorized to access your personal data to the extent and limit for which such access is necessary to pursue processing operations concerning them.

The Controller regularly checks the tools used to process your data and the security measures provided therefor, which are constantly updated; the Controller makes sure, also through the subjects authorized to process your data, that only personal data whose processing is necessary are collected, processed, filed or stored or whose processing purposes have not been achieved yet; the Controller checks that data are kept ensuring their integrity and authenticity and their use for the purposes of actual processing operations.

The Controller guarantees that any data which, also pursuant to controls, appear to be in excess or not pertinent will not be used, except for their storage in accordance with the law, the deed or the document that contains them.

Where

Data are stored in paper-based, computer and electronic filing systems located within the European Economic Area, taking specific security measures.

For how long

Your personal data are stored for the time necessary to carry out the activities connected with the management of the contract you have concluded with the Controller and to meet all obligations, including statutory obligations, deriving therefrom.

In particular:

<p>identification data accounting data data relating to the professional and commercial activity</p>	<p>Duration of the contractual relationship</p> <p>This does not prejudice:</p> <ul style="list-style-type: none"> - the restriction of processing and other guarantees laid down especially for data relating to criminal convictions or offences - contract termination (for any reason) - purposes that survive contract termination (e.g. book-keeping, art. 2220 of the Italian Civil Code) - the applicable limitation periods: from five to ten years starting from termination of the relationship and otherwise from the moment in time when the rights ensuing therefrom can be enforced (art.s 2935, 2946 and 2947 of the Italian Civil Code) <p>Without prejudice to a dispute if it implies the extension of the said terms, for the time required to pursue the corresponding purpose</p>
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IT data (logs for access to systems and networks and/or IP addresses)	The period of storage depends on the presumed and/or actual risk and on the detrimental effects arising therefrom, without prejudice to the adoption of measures to make data anonymous or restrict their processing In any event, data will be kept (starting from the moment when the harmful event or data breach is discovered/detected) for the time necessary to notify the supervisory authority of the data breach identified through the procedures implemented by the Controller, and to remedy thereto
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Once all the purposes that legitimate the storage of your personal data are achieved, the Controller will erase them or make them anonymous.

What are your rights?

Your rights always ensure that you can control your data. You have rights of:

- access;
- rectification;
- erasure;
- restriction of processing;
- objection to processing;
- portability.

In essence, you may enforce the following rights at any time, at no cost and with no charges or special formalities:

- you may obtain confirmation of processing by the Controller;
- you may access your personal data and have information on the source from which your data originate (when data are not obtained from you directly), on the purposes of processing, the details of their recipients, the period for which your data will be stored or the criteria used to determine that period;
- you may update or rectify your personal data so that they are always exact and accurate;
- you may erase your personal data from any data banks and/or filing systems, including backup systems where, *inter alia*, they are no longer necessary for the purposes of processing or where this is presumed to be unlawful, provided the conditions required by law are met; and provided processing is not justified on other equally legitimate grounds;
- you may restrict processing of your personal data in specific circumstances, for example where you have contested their accuracy, for a period enabling the Controller to verify the accuracy of such personal data. You will be informed, in reasonable time, also of termination of the period of suspension or when the cause for the restriction of processing no longer applies, and thus the restriction is lifted;
- you may obtain your personal data, where their processing is based on a contract and with automated means, in electronic format in order also to send them to another controller.

The Controller will provide therefor without delay and in any case no later than one month from receipt of your request. This term may be extended to two months, where necessary, taking account of the complexity and number of requests received. In these cases, the Controller will inform you and will give you reasons for the extension, within one month from receipt of your request.



To obtain further information or to send your request, please write to the Controller at **KBSAC-Privacy@knorr-bremse.com**.

How and when can you object to the processing of your personal data?

You may object at any time to the processing of your personal data on grounds relating to your particular situation if such processing is based on legitimate interests, by sending your request to the Controller at **KBSAC-Privacy@knorr-bremse.com**.

You are entitled to obtain the erasure of your personal data where there are no overriding legitimate grounds for the processing compared to the grounds of your request.

Who can you lodge a complaint with?

Without prejudice to any other action before administrative or judicial authorities, you may lodge a complaint with the data protection supervisory authority, unless you reside or work in another Member State. In the latter case, or where the violation of personal data protection regulations takes place in another EU country, the supervisory authority established therein will be competent to receive your complaint.

You will be promptly informed of any update to this privacy notice, using appropriate methods, and the same will be done if the Controller processes your data for additional purposes to those set out herein; in the latter case, you will be notified prior to such processing and reasonably in advance to enable you to give your consent, where necessary.