










PRIVACY POLICY IN THE CONTEXT OF CONTRACTS WITH CUSTOMERS PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 (HEREINAFTER, THE ‘GDPR’) AND APPLICABLE NATIONAL PRIVACY LEGISLATION

	THE DATA CONTROLLER	Nextchem S.p.A., Via di Vannina 88/94, 00156 Rome – Italy; Tax ID, VAT 16951401005 Certified public e-mail address nextchemholding@pec.it (“Company”).
	DATA PROTECTION OFFICER (DPO)	The contact details of the DPO are available on the Company’s website.


	PERSONAL DATA PROCESSED
	<p>‘Data’ means such data pertaining to natural persons processed by the Company for the stipulation and execution of the contractual relationship with legal persons representing customers/clients (hereinafter, ‘Customers’), such as those of the legal representative that signs the contract in the name and on behalf of the Customer, as well as the employees/consultants of the Customer involved in the activities referred to in the contract. In the latter case, the source of the Data is the Customer. Data could also include any judicial data reported in public databases.</p> <p>In particular cases, related to the management of short- and/or long-term trips of employees and/or consultants of the customer to the headquarters of the Company, the personal data of their families may also be processed.</p>


	SOURCE OF DATA AND CATEGORIES OF DATA COLLECTED BY THIRD PARTIES
	Data is collected from the data subject (i.e. directly provided by you) or, during the contractual relationship, acquired from third parties (for example, a company which, by accessing public databases, checks if the supplier is included in an international restricted list).


 PURPOSES OF PROCESSING	 LEGAL BASIS OF PROCESSING	 DATA RETENTION PERIOD
Purposes related to the establishment and execution of the contractual relationship between the Customer and the Company, including: <ul style="list-style-type: none"> - Registry management - Management of purchase requests and/or orders - Contract management - Commercial tender management, sales management and monitoring - Complaints management - Management of travel and stays of employees and/or Customer employees (including any family members) at the Company’s offices (e.g. accommodation bookings, enrolment in schools, support for family reunification procedures, logistics support) 	Execution of the contract for legal representative Data. Legitimate interest for Data of Customer employees/associates/consultants involved in the activities referred to in the contract and any family members thereof.	Contractual duration and, after termination, the ordinary statutory limitation period of 10 years.
Fulfilment of administrative and accounting obligations, such as the management of accounting, treasury, planning and audit activities, as well as invoicing (for example, checking and recording of invoices), in compliance with the requirements of current legislation.	Need to fulfil a legal obligation to which the Company is subject.	Contractual duration and, after termination, for a period of 10 years.





Purposes related to the managing internal and external audits	Legitimate interest (better management of Company activities)	Until the end of the employment relationship and, after termination, for a period of 10 years.
If necessary, to ascertain, exercise or defend the rights of the Data Controller in court, including credit recovery	Legitimate interest (judicial protection)	In the case of litigation, for the duration of the litigation, until the time limits for appeals have been exhausted.
Checking, through specialised companies, whether the customer is on an international 'restricted list', as well as the requirements of integrity of the managerial staff.	Legitimate interest (protection of the company and corporate assets).	Contractual duration and, after termination, for a period of 10 years. For data relating to criminal convictions and offences: 6 months from the time the information file is received
Purposes related to the control of computer access to corporate information systems, to ensure the security of people and goods (for example: log management, management of system administrator logs)	Legitimate interest (protection of the company and corporate assets. Security)	One year from the detection of computer access 6 months for system administrator access logs
Once the retention terms indicated above have elapsed, the Data will be destroyed or made anonymous.		

	<p>PROVISION OF DATA</p> <p>The provision of data is mandatory for conclusion of the contract and/or execution thereof. Any refusal to provide Data will, therefore, not allow the establishment of a contractual relationship and/or make it impossible to fulfil the consequent obligations.</p>
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	<p>DATA RECIPIENTS</p> <p>The Data may be disclosed to third parties acting as data controllers, for example, banks and credit institutions, auditing companies, companies belonging to the same group to which the Company belongs for administrative and accounting purposes, independent professionals (law and accounting firms), insurance companies, supervisory and control authorities and bodies and in general public or private parties entitled to request the Data.</p> <p>The Data may also be communicated to European and non-European legal entities of Maire Tecnimont Group as well as to Partners for contractual and/or commercial purposes.</p> <p>The Data may be processed, on behalf of the Data Controller, by external parties appointed as data processors that perform specific activities on behalf of the Data Controller, for example, accounting, tax and insurance obligations, correspondence mailing, management of collections and payments, consultancy management, companies that prepare videos or photographs in event organisation, etc.</p>
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	<p>AUTHORISED PERSONS</p> <p>The Data may be processed by employees of the company departments responsible for the pursuit of the aforementioned purposes who have been expressly authorised to conducted Data processing and have received adequate instructions.</p>
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	<p>TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION</p> <p>The Data may be shared with legal entities belonging to the Maire group, including in countries outside the European Union.</p> <p>The Data may be transferred to other parties in countries outside the European Union by virtue of a contractual and/or commercial relationship or for specific business needs.</p> <p>Data transfers are occasional and to conclude and/or execute a contract between the Company and/or other natural or legal persons in favour of the data subject, and therefore permitted pursuant to Article 49.1 (c) of the GDPR.</p>
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	RIGHTS OF DATA SUBJECT - COMPLAINTS TO THE CONTROL AUTHORITY
	By contacting the Group Corporate Affairs, Governance and Compliance function via e-mail at privacy@groupmaire.com , data subjects may request the controller to provide access to the data concerning them, correct inaccurate data, integrate incomplete data, delete data and limit the processing in the cases indicated in art. 18 of the GDPR ¹ , where applicable; they may also oppose the processing of all or part of the data required for the pursuit of the controller's legitimate interest, at any time.
	Furthermore, if processing is based on consent or on the contract and is carried out using automated tools, the data subject shall have the right to receive the Data in a structured and commonly used format that can be read on automatic devices, and, if technically feasible, to send them to another controller without impediments. Data subjects are entitled to lodge a complaint with the competent supervisory authority.

¹ The right to limitation of the processing consists in the temporary submission of the data to the storage operation only, in the following cases provided for by art. 18 GDPR:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.