MEDITERRA DATACENTERS S.R.L.
SUPPLIER PRIVACY NOTICE

in accordance with Art. 13 GDPR of the EU Regulation 2016/679 ("**GDPR**")

With this notice, the data controller wishes to provide you with details regarding the processing of your personal data for the purposes of establishing and managing the supply contract.

Data Controller

Mediterra DataCenters S.r.l., with registered office at Piazza V Giornate 10, 2019, Milan, represented by its legal representative, is the data controller of your personal data (the "**Controller**" or "**Mediterra**").

The Controller can be contacted at the following email address: privacy@mediterradatacenters.com. The Data Protection Officer (DPO), appointed by the Data Controller pursuant to Article 37 of the GDPR, can be contacted at the following email address: dpo.mediterra@sgsolution.eu.

Categories of personal data processed

Pursuant to the GDPR, personal data means: "*any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*" (the "**Personal Data**").

For the purposes of drafting the contracts of which you are a part and managing any activity related to the legal relationship established with you, Mediterra collects and processes the following types of Personal Data:

- personal and identification data (*e.g.*: name, surname, date and place of birth, tax code and/or VAT number);
- contact details (*e.g.*: residential address, phone number, and email address);
- professional title;
- bank details of the organization for which the suppliers work;
- in general, any other information necessary for the conclusion and execution of the contract.

The Controller undertakes to ensure that the information collected and used is appropriate for the purposes described and that this does not result in an invasion of your personal sphere.

Purpose of processing and legal basis for processing

The Controller collects and processes Your Personal Data only to the extent strictly necessary to achieve the following purposes.

a) **Fulfill pre-contractual requirements** (e.g., offer or order instructions, credit checks).

With regard to this purpose, the legal basis for processing is Art. 6, par. 1, lit. b), GDPR, namely the necessity to execute a contract to which the data subject is a party or pre-contractual measures taken at the request of the same.

b) **Fulfillment of contractual obligations** (e.g., supply of goods and/or services, including the management of delivery obligations and related logistics and transport) **and legal obligations** (e.g., accounting, tax formalities, administrative and accounting management).

Regarding this purpose, the legal basis for processing is Article 6, paragraph 1, letter b), GDPR, namely the necessity to execute a contract to which the data subject is a party, or pre-contractual measures adopted at their request, as well as Article 6, paragraph 1, letter c), GDPR, namely the necessity to comply with a legal obligation to which the Data Controller is subject.

c) **Supplier management for aspects other than those under a) and b)**: internal organization of activities related to the active and passive supply of products and/or services such as, for example, management of assignments and risk control (frauds, insolvencies, etc.), management of disputes and credit transfers, management of financial and insurance services, management of electronic payment instruments, management of telephone directories, statistical processing).

With regard to this purpose, the legal basis for processing is Article 6, paragraph 1, letter f), GDPR, namely the legitimate interest of the Data Controller.

Methods of processing

Personal Data are processed with the necessary security and confidentiality to ensure compliance with the current regulations. The processing methods include: the collection of data at the company, the collection and registration of such data for specific, explicit purposes, and the use of data in further processing operations only if compatible with the purposes for which such data were collected. Furthermore, processing may occur with the aid of electronic tools.

Mandatory or optional nature of data provision and consequences of a possible refusal to respond:

The provision of your Personal Data is a necessary requirement for the conclusion and execution of the contract. Failure to provide the requested Personal Data will make it impossible for the Data Controller to proceed with pre-contractual and contractual requests.

Data communication to third parties

The data is processed within the Data Controller's organization by individuals (employees and collaborators) who are authorized and appointed to process the data under the responsibility of the Controller for the purposes mentioned above.

For the pursuit of the purposes listed above, the Controller may disclose your Personal Data to the following categories of recipients, who will process your Personal Data as data processors or independent data controllers.

By way of example and not exhaustively, the entities to whom Personal Data may be disclosed are:

(i) group entities: the Controller, when necessary for the provision of the requested services, may share your Personal Data with the affiliated companies and branches of the Mediterra group;

(ii) suppliers and subcontractors: your Personal Data may be transferred to the suppliers and subcontractors of Mediterra only to the extent necessary for the provision of the requested services;

(iii) in exceptional situations, Mediterra may be obliged to disclose Your Personal Data to competent governmental authorities or other authorized entities, in compliance with legal obligations, or if it is necessary to protect the vital interests of Mediterra's employees, customers, or the public.

Data transfer

Your Data is not transferred to countries outside the European Economic Area. Should such transfers take place; in order to protect the data, the Data Controller will adopt the appropriate safeguards provided for under the GDPR, including adequacy decisions and standard contractual clauses approved by the European Commission.

Retention times

Your Personal Data is retained by the Controller for the time necessary to achieve the purposes indicated above.

In particular, your Data will be processed for the entire duration of the contractual relationship and will be stored for an additional period of 10 years following the termination of the same relationship solely for purposes related to the fulfillment of legal obligations or the defense of Mediterra's rights. Subsequently, once the reasons for processing cease to exist, the Personal Data will be deleted, destroyed, or simply kept in anonymous form.

Data subject rights

During the period in which the Data Controller is in possession or processes the Personal Data, you, as the data subject, can exercise the following rights at any time:

- right of access to data;
- right to rectification of data;
- right to erasure of data;
- right to restriction of processing;
- right to object to processing;
- right to data portability;
- right to withdraw consent at any time;
- right not to be subject to an automated decision that has legal effects concerning your person.

Furthermore, you have the right to file a complaint with the Supervisory Authority (Italian Data Protection Authority, Piazza Venezia 11, 00187 - Rome, Italy, Telephone +39 06696771, E-mail: protocollo@gpdp.it, www.garanteprivacy.it).

You can exercise your rights by contacting the Data Controller or the DPO at the contact details provided above.

Upd 20 May 2026

mailto:protocollo@gpdp.ithttp://www.garanteprivacy.it/