

Business Partner Privacy Notice

We, *The Bloc Italy Srl SB* (“**We**,” “**Us**,” or “**Our**”) are committed to protecting the personal data we collect from employees, agents, temporary and contract personnel, and other related persons (“**You**”) working under or in relation to Our business partners, such as clients, suppliers, vendors or other business partners (each a “**Business Partner**” and collectively, “**Business Partners**”). With this Business Partner Privacy Notice, We, as controller for your Personal Data under the General Data Protection Regulation (“**GDPR**”) want You to understand Our practices regarding the collection, storage, use, disclosure and/or deletion (collectively “**Process**” or “**Processing**”) of any information relating to You (“**Personal Data**”) that We Process in the context of the relationship with Our Business Partners.

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1. How to Contact Us; Contact Details of the Data Protection Officer

Our contact details are as follows:

*The Bloc Italy Srl SB
Via Tommaso Agudio 2
20154 Milan (Italy)*

Please do not hesitate to contact Us if You have any questions related to this Notice. You can reach out anytime by sending an email to Italy.info@thebloc.com. You can also contact Our data protection officer (“**DPO**”) at italy.dpo@thebloc.com.

2. Description of the Data Processing / Processing Purposes

We only Process your Personal Data to the extent that it is related to the relationship with Our Business Partners. In particular, We will not subject your Personal Data to automated decision-making, including profiling. In the following table, We provide more information on the purposes for which We Process your Personal Data:

Processing purpose	Details
Business Relationship Management	Contact and communication with Business Partners, information and document exchange, managing contractual relationships with Business Partners, communication relating to the performance of services
Regulatory Compliance	Compliance with applicable legal requirements such as KYC checks, tax regulations, fraud prevention and anti-money laundering related activities; responding to and complying with authority requests
Marketing	Determine areas of interest for Business Partners, tailor marketing activities to interests, providing direct and indirect marketing communication
Legal Purposes	Establishment, exercise or defence of legal claims, cooperation with or notification of law enforcement agencies and/or regulatory authorities as required by law, engaging external advisors

3. Categories and Sources of Personal Data / Legal Bases / Requirement to provide Personal Data

We Process only such Personal Data that is necessary for the Processing purposes detailed above. Below, You will find more information about the categories of Personal Data We Process and where We have obtained your Personal Data from, what legal basis applies to which Processing activities and whether You are required to provide any Personal Data to us.

3.1 Categories and Sources of Personal Data

In the table below, We provide an overview of the categories of Personal Data that We Process as well as additional information what data are typically covered by each category:

Categories of Personal Data	Details
Business Contact Information	Your name, work address, business contact details, title, role, name of the Business Partner that is your employer, including marketing consents (if applicable)
Business Partner Data	Data that is legally required for compliance screenings and Business Partner on-boarding, such as compliance screenings, export control checks, including date of birth, nationality or place of residence, ID numbers and other relevant data related to ultimate beneficial ownership
Communication Data	Email content, business letter data, signatures (if provided)
Project Data	Data related to projects (status, client, etc.) and corresponding document (work products), project milestones, data relating to orders places, payments made, requests

Any Personal Data We Process is usually provided by You directly or has been provided from Our Business Partner as your employer.

3.2 Legal Bases

When We Process your Personal Data for the Processing purposes detailed under 2 above, We rely on the legal bases of Art. 6 (1)(c) GDPR (“**Compliance with legal obligations**”) and/or Art. 6 (1)(f) GDPR (“**Legitimate Interest**”).

In certain limited cases, such as marketing, We may rely on your consent pursuant to Art. 6 (1)(a) GDPR

3.3 Requirement to provide Personal Data

Providing your Personal Data is not required by law or contract. However, without your Personal Data, We may not be able to carry out certain Processing activities, e.g., performing the business relationship with the Business Partner.

4. Recipients

The following recipients may have access to your Personal Data:

4.1 Service providers

We may share your Personal Data with Our parent entity The CementWorks, LLC d/b/a The Bloc (“**The Bloc**”) and third-party service providers to provide IT and administrative support services, such as operational, accounting and financial administration support, provision of IT infrastructure and applications (such as cloud services and IT tools), and IT maintenance.

We will only share your Personal Data with such service providers if the respective service providers have provided sufficient guarantees that they have implemented appropriate technical and organisational measures in such a manner that Processing your Personal Data will meet the requirements of applicable data protection law and ensure the protection of your data subject rights.

4.2 Third parties

We may also disclose your Personal Data to third parties who Process your Personal Data as independent controllers, i.e., who will Process your Personal Data for their own purposes.

Advisors and authorities: This will in particular include auditors, accounting service providers, lawyers, banks, tax advisors and similar bodies to the extent that sharing your Personal Data with them is necessary for the provision of their services and/or compliance with Our legal obligations. We may also be legally obligated to provide information to certain public authorities upon request, such as law enforcement agencies, authorities that prosecute administrative offenses subject to fines and tax authorities.

Other group entities: We may also transfer your Personal Data to The Bloc to ensure efficient and effective business operations and to enable the administration of global business operations and workforce, which includes transfers to track the progress of projects with clients (relating to the overall project). We may also share your Personal Data with other group entities to enable us to provide the services requested by the Business Partner.

5. International Data Transfers

We will transfer your Personal Data to recipients outside the European Union / European Economic Area (“**EU/EEA**”).

- Some recipients of your Personal Data outside the EU/EEA, e.g., certain service providers or third parties are located in countries for which the European Commission has determined that this country ensures a level of protection equivalent to the level of data protection in the EU/EEA (adequacy decision), such as e.g., recipients

in the USA, who are certified under the EU-US Data Privacy Framework or recipients in countries such as Israel, Canada or the UK. Thus, your Personal Data are protected pursuant to Art. 45 GDPR.

- Some recipients of your Personal Data are located in a country for which the European Commission has not adopted an adequacy decision. This applies in particular to recipients in the USA who are not certified under the EU-US Data Privacy Framework. In those cases, We have entered into appropriate data transfer agreements with the recipients based on the standard contractual clauses pursuant to Art. 46 para. 2 lit. c GDPR and will implement appropriate technical and organizational security measures to protect your Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access and against all other unlawful forms of Processing. A copy of the executed standard contractual clauses can be requested via the contact details provided under **Error! Reference source not found.** above.

6. Retention

We generally retain your Personal Data for as long as required or permitted by applicable law, in particular for as long as such data might be needed to comply with statutory retention periods (in particular under tax law) or to fulfil or defend against claims that are not yet time-barred under applicable statutory law. Thereafter, We will remove your Personal Data from Our systems and records and/or take steps to properly anonymize it so that You can no longer be identified from it.

The typical retention periods for your Personal Data are 1 year.

Where Personal Data is transferred to The Bloc, it may be subject to longer retention periods where this is required for The Bloc to comply with applicable laws, in particular tax law requirements. In any case, The Bloc will ensure that your Personal Data is not processed longer than necessary to comply with such legal requirements.

7. Your Rights Under Data Protection Law

You have the rights described below in relation to the Processing of your Personal Data. To exercise your rights, You can make a request by post or email to Us. Your rights may be restricted by applicable law, in particular to the extent that your Personal Data constitutes a trade secret or business secret.

- **Right of access:** You have the right to obtain confirmation from Us at any time as to whether or not Personal Data concerning You are being Processed, and, where that is the case, to obtain access to the Personal Data relating to You that is being Processed by Us to the extent and under the conditions of Art. 15 GDPR.
- **Right to rectification:** You have the right to obtain from Us without undue delay rectification and completion of your Personal Data if it is inaccurate or incomplete, Art. 16 GDPR
- **Right to erasure:** You have the right to request erasure of Personal Data concerning You from Us under the conditions of Art. 17 GDPR.
- **Right to restriction of Processing:** You have the right to obtain from Us restriction of Processing in accordance with Art. 18 GDPR. This right applies in particular (i) if the accuracy of the Personal Data is contested between You and Us, for a period enabling Us to verify the accuracy of the Personal Data, (ii) if You request restricted Processing instead of erasure in case of an existing right to erasure, (iii) if the Personal Data are no longer necessary for the purposes pursued by Us, but You need them for the establishment, exercise or defence of legal claims, or also (iv) if the successful exercise of an objection is still disputed between You and Us.
- **Right to data portability:** You have the right to receive from Us the Personal Data concerning You that You have provided to Us in a structured, commonly used and machine-readable format in accordance with Art. 20 GDPR.
- **Right to object:** In certain cases, You have the right to object to the Processing on grounds relating to your particular situation in accordance with Art. 21 GDPR. We will abide by your request unless We have compelling legitimate grounds for the Processing which override your interests, rights and freedoms, or if We need to continue to Process the data for the establishment, exercise or defence of a legal claim.
- **Right to withdraw consent:** If We have requested your consent to the Processing of your Personal Data and You have provided such, You have the right to withdraw your consent at any time with effect for the

future, free of charge. Any withdrawal of consent does not affect the lawfulness of the Processing prior to such withdrawal.

- **Notification obligation regarding rectification or erasure:** Pursuant to Art. 19 GDPR, We shall notify all recipients to whom Personal Data have been disclosed of any request for rectification or erasure of the Personal Data or for restriction of Processing, unless this proves impossible or involves disproportionate effort. You have the right to request information about these recipients from Us.
- **Complaint to the data protection authority:** You also have the right to lodge a complaint with the competent data protection authority if You believe that We have not complied with applicable data protection laws.

8. Changes to this Privacy Policy

If we need to update this Privacy Policy, You can access the most current version of this Privacy Policy at <https://www.thebloc.com/locations/milan/>.

Last update: march 2024