

	PERSONAL DATA PROCESSING INFORMATION	Pagina 1 di 3
		PG-003/29 Rev.1 Ed. 1 28/09/2026

With this information notice UNIRELAB S.r.l. Unipersonale, Via XX Settembre, 20 - 00187 Rome ("Data Controller") communicates, pursuant to Articles 13 and 14 of EU Regulation No. 2016/679 ("GDPR"), its policies on the processing of personal data, for institutional purposes, related to the provision of goods and services.

1) Data Controller

The Data Controller of the personal data of the Data Subject, pursuant to Articles 4 and 24 of EU Regulation 2016/679, is UNIRELAB S.r.l. Unipersonale, Via XX Settembre, 20 - 00187 Rome, in the person of its legal representative pro tempore.

The Interested Party is in turn considered autonomous data controller of data of third parties, including its employees/collaborators, that it should transmit to the Data Controller. In this regard, the Interested Party warrants as of now that their transmission will take place subject to the acquisition of the third party's consent to the processing of its personal data and/or other suitable legal basis, and assumes all legal obligations and responsibilities.

2) Data Protection Officer

The Data Protection Officer (DPO), in accordance with Article 37 EU Regulation 2016/679, is Lawyer Mario Valentini, right DM N.6827 of 23/05/2018. The Data Subject may contact the DPO directly to exercise his or her rights, as well as to receive any information related to the processing of his or her personal data and/or this policy, at the following addresses:

- Registered mail with return receipt addressed to: **UNIRELAB S.r.l. Unipersonale Via XX Settembre, 20 00187 – ROME - ITALY**
- Email addressed to: **dpo@unirelab.it**

3) Type of data processed and purpose of processing

The data subject to the processing referred to in this notice are as follows:

- "common" data such as first name, last name, tax code, addresses and contact details, personal image;
- "labor" data, related to the pre-contractual and/or contractual relationship with the Data Controller, such as administrative, accounting, insurance and tax data;
- "judicial" data, such as those relating to criminal convictions and offenses or related security measures, where such processing is necessary in accordance with the provisions of the Procurement Code (Legislative Decree No. 50/2016) and Presidential Decree No. 445/2000.

Personal data may refer to suppliers natural persons or sole proprietorships, or to a "point of contact", a natural person acting on behalf of suppliers legal persons, or their employee, duly instructed in order to execute the existing contractual relationship between the Holder and the supplier legal person. The latter will submit the Notice to the natural persons within its business organization who are in charge of executing the business relationship with the Controller.

The collection and processing of personal data listed above is carried out:

- a) for the management of all aspects related to the request for laboratory analysis services and the establishment of a contractual relationship, as well as the subsequent management, execution and termination of the same, such as, but not limited to, administrative, accounting, insurance and tax data;
- b) to fulfill any obligation imposed by law or arising from the contractual relationship, and orders or measures of public bodies and competent authorities and for the transmission to them of data in accordance with legal obligations or specific requests addressed to the Data Controller;
- c) for the defense of the rights of the Data Subject, the Data Controller and its successors in title.

The personal data collected will be processed in accordance with the principles of fairness, lawfulness, transparency and protection of the confidentiality and rights of the Data Subject.

The communication of personal data is a contractual obligation and is, therefore, necessary for the purpose of the request for the performance of laboratory analysis services, as well as, possibly, for the purpose of the conclusion, management and execution of the relevant contract.

Refusal to provide the requested data will make it impossible to process the request from the Interested Party and to provide for the conclusion, management and execution of the contract, as well as the fulfillment of the regulatory obligations incumbent on the Data Controller.

4) Legal basis for processing

For the purposes referred to in Art. 3, lett. a) above, the legal basis for data processing is the need to execute a contract to which the Data Subject is a party or the execution of pre-contractual measures taken at the request of the same (Art. 6 par. 1 lett. b GDPR), as well as the need to execute a task of public interest or related to the exercise of public powers vested in the Data Controller.

	PERSONAL DATA PROCESSING INFORMATION	Pagina 2 di 3
		PG-003/29 Rev.1 Ed. 1 28/09/2026

For the purposes referred to in Art. 3(b) above, the legal basis for data processing is the need to fulfill a legal obligation to which the Data Controller is subject (Art. 6 par. 1 lett. c GDPR).

For the purpose referred to in Art. 3(c) above, the legal basis for data processing is the pursuit of a legitimate interest of the Data Controller, in particular consisting of the exercise of the right of defense (Art. 6 par. 1 lett. f GDPR).

5) Method of processing and data retention period

The Data Subject's data will be processed in a manner that ensures adequate security, integrity, confidentiality, completeness, availability and prevention, through appropriate technical and organizational measures, from unauthorized or unlawful processing and accidental loss from destruction or damage, in accordance with the provisions of EU Regulation No. 2016/679. All activities involving the processing of the Data Subject's personal data are carried out through traditional and electronic communication tools.

In compliance with the principles of lawfulness, purpose limitation and data minimization, in accordance with Article 5 Regulation (EU) 2016/679, your personal data will be kept for the duration of the activities aimed at the realization of the institutional tasks of the Company; personal data may be kept for longer periods to be processed exclusively for archiving purposes in the public interest, scientific or historical research or statistical purposes, in accordance with Article 89(1) of Regulation 2016/679/EU.

Regardless of the data subject's determination to their removal, personal data will in any case be retained in accordance with the terms provided for by the current legislation and/or national regulations, for the exclusive purpose of ensuring the specific fulfillments, proper to the activities within the competence of the *Data Controller*.

This is without prejudice to cases in which matters pertaining to the Holder's activities should be brought before the courts, in which case the Data Subject's personal data, only those necessary for such purposes, will be processed for the time essential to their pursuit. Data that are no longer necessary or for whose processing there is no longer a legal prerequisite, or for which the storage period has expired, are anonymized or securely destroyed.

6) Recipients of data communication

The personal data of the Data Subject may be disclosed, in accordance with the provisions of the GDPR, to the following entities:

- competent offices and internal staff of the Data Controller, who act as persons authorized to the Processing pursuant to Article 29 GDPR to whom the provision of the Data Subject's personal data is necessary or otherwise functional for the performance of obligations arising from the execution and management of the employment relationship
- subjects external to the Data Controller, appointed as Data Processors, to whom the provision of the personal data of the Data Subject is necessary or in any case functional for the management of the requests for the performance of services received and the fulfillments from the execution and management of the pre-contractual and/or contractual relationship, such as administrative, insurance, accounting, tax and legal fulfillments (e.g. consultants for the management of billing activities; consultants for the drafting of contracts; banks for the payment of fees; public administrations - such as the Inland Revenue Agency, etc.), as well as control and administrative bodies to whom the data are communicated in the context of legal, administrative and accounting communications, acting as autonomous data controllers or possible data processors;
- parties to whom the Data Controller is obliged to communicate the data if there is a legal obligation, such as the Judicial Authority, Administrative Authorities and Law Enforcement, acting as autonomous data controllers;

7) Rights of the data subject

We inform you that you may exercise your rights under Reg. (EU) 2016/679, described analytically below:

- Right of access *ex art. 15*

You have the right to obtain, from the Data Controller, confirmation of the existence or otherwise of the processing of personal data relating to your data, to know its content and origin, to verify its accuracy and, if so, to obtain access to the said data. In any case, you have the right to receive a copy of the personal data being processed.

- Right of rectification *ex art. 16*

You have the right to obtain, from the Data Controller, the integration, updating as well as rectification of your personal data without undue delay.

- Right to cancellation *ex Art. 17*

You have the right to obtain, from the Data Controller, the deletion of personal data concerning you, without undue delay, in cases in which one of the hypotheses provided for in Article 17 (personal data no longer necessary in relation to the purposes for which they were collected or processed, revocation of consent and no other legal basis for processing, personal data processed unlawfully, exercise of the right to object, etc.).

- Right to limitation of processing *ex art. 18*

You have the right to obtain, from the Data Controller, the limitation of the processing of personal data in the cases expressly provided for in the Regulations, i.e. when: you dispute the accuracy of the data, the processing is unlawful and you request that its use be merely limited, the data are necessary for the establishment, exercise or defense of a right in a court of law, or you have opposed the processing for legitimate reasons.

	PERSONAL DATA PROCESSING INFORMATION	Pagina 3 di 3
		PG-003/29 Rev.1 Ed. 1 28/09/2026

If the processing is restricted, personal data will be processed only with your explicit consent. The Controller is required to inform you before the restriction is lifted.

- Right to data portability *ex art. 20*

Where processing is carried out by automated means, you are guaranteed the right to the portability of personal data concerning you, where the processing is based on consent or a contract, as well as the direct transmission of such data to another data controller, where technically feasible.

- Right of objection *ex art. 21*

You have the right to object at any time, for reasons related to your particular situation, to the processing of personal data concerning you. A balancing between your interests and the compelling legitimate grounds for processing (including, for example, establishment, exercise and defense of a right in court, etc.) will, however, be carried out by the Data Controller.

Requests for the exercise of the above rights should be addressed directly to:

- **UNIRELAB S.r.l. Unipersonale Via XX Settembre, 20 00187 – ROME - ITALY**
- **dpo@unirelab.it**

We also inform you that you may file a reasoned complaint with the Data Protection Authority (Art. 57, par. 1, lett. f, Reg. 679/2016) pursuant to the provisions of Chapter I, Title I, Part III of Legislative Decree 101/2018:

- via e-mail, at: garante@gdp.it / urp@gdp.it
- by fax: 06 696773785

- or by mail, to the Guarantor for the Protection of Personal Data, located in Rome (Italy), Piazza di Monte Citorio n. 121, cap 00186 or alternatively by recourse to the Judicial Authority pursuant to Article 140-bis of Legislative Decree 101/2018.

**Unirelab S.r.l. Unipersonale
Il Titolare del Trattamento
(Data Controller)**

Luca Branciani



[Location], [Date]

The Interested Party
