

		Document:	Privacy Notice on the Processing of Personal Data of Suppliers and Supplier Representatives		
		Code:	PRV-CLI-01		
Status:	PUBBLIC	Revision:	01.00	Date:	01/07/2026
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Privacy Notice on the Processing of Personal Data of Suppliers and Supplier Representatives

Rev. 01.00

Pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR")

1. Data Controller

The Data Controller is:

IPSES S.r.l.

Registered Office: Piazzale Giulio Cesare 9, 20145 Milan, Italy.

For any request concerning the processing of personal data or to exercise the rights granted under Regulation (EU) 2016/679, you may contact the Data Controller using the dedicated contact details below.

E-mail: privacy@ipses.com

2. Purposes and Legal Bases of Processing

Personal data are processed for the following purposes.

a) Assessment and management of supplier relationships

- management of requests for quotations and negotiations;
- supplier qualification and selection;
- management of orders and contracts;
- management of activities related to the supply of goods and services.

Legal basis: performance of pre-contractual measures taken at the request of the data subject and performance of a contract (Art. 6(1)(b) GDPR).

b) Administrative, accounting and tax management

- recording of supplies and services;
- management of invoicing and payments;

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Registered office: Piazzale Giulio Cesare, 9 - 20145 Milan ITALY | VAT code: 03999740966
 Research and development office: Viale Carlo Forlanini, 44/A - 20024 Garbagnate Milanese (MI) ITALY
 Tel. (+39) 02 39449519 | Fax (+39) 02 700403170 | e-mail: info@ipses.com | <https://www.ipses.com>

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- fulfillment of administrative, accounting and tax obligations;
- compliance with applicable legal and regulatory requirements.

Legal basis: compliance with a legal obligation (Art. 6(1)(c) GDPR).

c) Supplier management and monitoring

- performance evaluation;
- verification of required qualifications and requirements;
- management of supplier qualification and monitoring activities.

Legal basis: legitimate interest of the Data Controller in the proper management of commercial and contractual relationships (Art. 6(1)(f) GDPR).

d) Protection of the Controller's rights

- management of disputes and claims;
- establishment, exercise or defense of legal rights in judicial or extra-judicial proceedings.

Legal basis: legitimate interest of the Data Controller (Art. 6(1)(f) GDPR).

3. Categories of Personal Data Processed

The Data Controller may process:

- identification data;
- contact details;
- professional and business-related data;
- tax and administrative data;
- bank account details and data required for payment processing;
- additional information necessary for the management of the commercial and contractual relationship.

IPSES S.r.l. does not ordinarily process special categories of personal data pursuant to Article 9 GDPR or personal data relating to criminal convictions and offences pursuant to Article 10 GDPR within the scope of the activities covered by this Privacy Notice.

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4. Provision of Personal Data

The provision of the requested personal data is necessary for the assessment, establishment and management of the contractual relationship.

Failure to provide such data may make it impossible to establish or continue the commercial relationship.

5. Methods of Processing

Personal data are processed using paper-based, electronic and telematic means, in compliance with the principles of lawfulness, fairness, transparency, data minimization and confidentiality.

IPSES S.r.l. implements appropriate technical and organizational measures to ensure the security, integrity, availability and confidentiality of personal data.

6. Recipients of Personal Data

Personal data may be disclosed to parties acting either as independent Data Controllers or Data Processors, including:

- tax, accounting and legal consultants;
- banking institutions and parties involved in payment management;
- companies providing administrative and IT services;
- public authorities and supervisory bodies;
- other parties where disclosure is required or permitted by applicable laws and regulations.

An updated list of Data Processors is available from the Data Controller upon request.

7. Transfers of Personal Data to Third Countries

The use of IT services and collaborative platforms may involve the processing of personal data by service providers operating outside the European Economic Area (EEA).

In such cases, transfers are carried out in compliance with Articles 44 et seq. of the GDPR and through the implementation of the safeguards required by applicable data protection legislation.

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8. Data Retention Period

Personal data will be retained:

- for the duration of the contractual relationship;
- for the period required by applicable administrative, accounting and tax obligations;
- for the time necessary to protect the rights of the Data Controller.

In particular:

- contractual, administrative, tax and accounting documentation: for the period required by applicable laws and, in any case, for no less than 10 years;
- pre-contractual documentation: for the time necessary to manage negotiations and, in any case, no longer than 24 months from their conclusion, unless retention is required for the protection of the Controller's rights.

9. Data Subject Rights

Data subjects may exercise at any time the rights granted under Articles 15-22 of the GDPR, including:

- right of access to personal data;
- right to rectification of inaccurate data;
- right to erasure where applicable;
- right to restriction of processing;
- right to data portability;
- right to object to processing where permitted by law;
- right not to be subject to automated decision-making.

Requests may be submitted to the Data Controller using the contact details provided in this Privacy Notice.

10. Right to Lodge a Complaint with a Supervisory Authority

Data subjects have the right to lodge a complaint with the competent Data Protection Supervisory Authority pursuant to Article 77 GDPR if they believe that the processing of their personal data infringes applicable data protection legislation.

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11. Automated Decision-Making

IPSES S.r.l. does not carry out automated decision-making processes, including profiling, that produce legal effects concerning data subjects or similarly significantly affect them, pursuant to Article 22 GDPR.