

## INFORMATIVE NOTICE REGARDING THE PROCESSING OF DATA COLLECTED FROM SUPPLIERS

---

ICCROM, in adherence to its mission and institutional values, undertakes to protect personal data of natural persons regardless of their nationality or residence, respecting every human being's identity, dignity and fundamental freedoms in accordance with standards adopted regarding the processing and circulation of personal data. In pursuit of this undertaking, ICCROM will comply with accountability standards and implement consistent and appropriate safety measures and suitable policies.

Terms:

<b>Personal Data</b>	means any information relating to an identified or identifiable natural person ("Data Subject"); 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.
<b>Processing</b>	means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### Who we are and contact details

The Data Controller is ICCROM (International Centre for the Study of the Preservation and Restoration of Cultural Property), based in Rome, via di San Michele n. 13, Tel.: (+39) 06 585531; Fax: (+39) 06 58553349. The Data Controller may be reached at the following e-mail: [data-protection@iccrom.org](mailto:data-protection@iccrom.org).

### Scope of the present informative notice and to whom it is addressed

This informative notice covers personal data related to procurement and is addressed to suppliers with whom ICCROM establishes sales contracts or any assistance service.

### Data categories and Processing – Scope and legal basis of processing

The concerned personal data processed are personal identification data: name, surname, tax code, residence, mobile number, e-mail, Internet address, bank routing information, etc.

The personal data provided will be processed for the following purposes:

- To conclude and execute sales and post-sales contracts for products, additional services and technical assistance;
- To carry out all activities instrumental to the management of customer relations;
- To pursue legitimate interests of the Data Controller, such as the right of defence in court.

Processing of personal data is performed in execution of public interest duties and for the Data Controller's institutional purposes, provided that they do not prevail over the Data Subject's fundamental rights and freedoms. The personal data provided are necessary to supply the services and all the activities related to the execution of the contract, as well as to comply with the applicable laws; failure to provide these data, or to provide them partially or incorrectly, could make it impossible to fulfil the contractual obligations and the law.

## Automated decisions

ICCROM will never adopt a decision which may relate to the Person Concerned based solely on automated processing. Any decision associated with personal data processing will be taken by a natural person.

## Personal data sharing

Personal data shall be disclosed solely to recipients duly authorized by ICCROM. Personal data may/could be shared with recipients acting as processor(s) or as independent controller(s).

Personal data could be shared with (but not be limited to): a) entities providing information technology or telecommunication services (including, but not limited to, services such as e-mail, newsletters, website); b) entities providing security; or c) authorities charged by law or by decision of public bodies/entities to verify the fulfilment of obligation(s), when institutional purposes or public interest or public security are to be protected.

Data could even be shared with partners collaborating with the Organization on events, training courses, fellowships and scholarships, if deemed necessary to fulfil the aims of the collaboration.

## Data retention period

Personal data will be processed by ICCROM solely for purposes declared in this Statement. The data may be stored for a longer period(s) solely for archiving purposes, in accordance with the Organization's records retention schedule.

## Rights of Data Subjects

<b>Right of access</b>	Data Subjects have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning them are being processed, to access such personal data and to obtain the following information: a) the purposes of the processing operation; b) the personal data categories concerned; c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular those in third countries or international organizations; d) the expected period of personal data storage or applicable criteria for determining such period; e) the existence of the right to request from the Data Controller rectification or erasure of personal data or restriction of processing of personal data concerning or to object to such processing; f) data source, if personal data are not being provided by Data Subjects themselves; g) existence of automated decision making process, including profiling and, in such cases, relevant information concerning applied logic, as well as importance and consequences for Data Subjects arising from the processing.
<b>Right to rectification</b>	Data Subjects have the right to amend inaccurate Personal Data. Taking into account the purposes of the processing, Data Subjects are entitled to have incomplete personal data completed, including by means of providing a supplementary statement.
<b>Right to erasure</b>	Data Subjects have the right to request erasure of personal data to be obtained without unjustified delay and the Data Controller will be bound to erase Personal Data for any of the following reasons: a) Personal Data are no longer necessary to the purposes for which they were collected or processed; b) consent on which Data Processing is based has been withdrawn and there is no other legal basis for Processing; c) Data Subject has denied the right of Processing and there is no other prevailing legitimate reason for Personal Data Processing; d) Personal Data have been unlawfully processed. In some cases, the Data Controller will have the right not to erase Personal Data should the Processing be mandatory to fulfil legal obligations, for public interest reasons, for filing purposes in the public interest or for statistical use or establishment, exercise or defence of legal claims.
<b>Right to limit processing</b>	Data Subjects have the right to restrict processing in the following cases: a) the Data Subject contests the accuracy of the personal data (restriction will last for the time necessary for the Data Controller to assess accuracy of the 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 Data Controller

	no longer needs the personal data for processing but they are required by the Data Subject for establishment, exercise or defence of legal claims; d) the Data Subject objects to the data processing and is awaiting verification whether the Data Controller's legitimate grounds override those of the Data Subject. Should a processing restriction apply, personal data will only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.
<b>Right to data portability</b>	Data Subjects have the right to request and obtain any personal data they have provided to the Data Controller in a structured, commonly used and legible format or to ask for the data to be transmitted to another Data Controller, where technically feasible. In such case, the Data Subject shall be bound to give specific authorization in written form regarding the new Data Controller to whom the personal data is to be transferred.
<b>Right to object</b>	Data Subjects have the right to object, in any situation, for reasons related to their personal situations, to the processing of personal data related to them, included profiling. The Data Controller will refrain from further processing operations on the data in question, unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedom of the data subject, or for the establishment, exercise or defence of a legal claim.

Requests for the exercise of these rights must be submitted to the contacts indicated in this informative notice.

**Data Controller**

ICCROM