

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 – GDPR

ALL-FOOD S.R.L.

Version: 001

Date: 21/08/2026

1. DATA CONTROLLER

Pursuant to Articles 4 and 13 of Regulation (EU) 2016/679 ("GDPR"), the Data Controller is:

ALL-FOOD S.R.L.

VAT No./Tax Code: **01587130525**

Registered office: **Piazza Arnolfo di Cambio, 25 – 53034 Colle di Val d'Elsa (SI), Italy**

Certified email (PEC): **all-food@pec.it**

E-mail: **office@all-food.it**

2. CATEGORIES OF PERSONAL DATA PROCESSED

In the context of commercial and professional relationships, All-Food S.r.l. may process personal data relating to its customers, suppliers, prospective customers, prospective suppliers and their respective contact persons.

In particular, the following data may be processed:

- first and last name;
- name of the company or organization the individual belongs to;
- role, position or job title;
- business e-mail address;
- business telephone number;
- business address;
- data relating to the commercial or contractual relationship;
- data contained in communications exchanged;

any additional personal data contained in documentation and communications transmitted in connection with the professional relationship.

All-Food S.r.l. does not request, for ordinary commercial purposes, any data belonging to special categories of personal data pursuant to Article 9 GDPR.

Should such data be incidentally acquired, they will be processed exclusively within the limits permitted by applicable legislation.

3. SOURCE OF THE DATA

Personal data may be collected:

- directly from the data subject;
- from the company or organization for which the data subject works;
- in the course of commercial and professional communications;
- through e-mail, telephone, website, contact forms and other communication tools;

through publicly accessible sources, where permitted by applicable legislation.

Where personal data are not collected directly from the data subject, All-Food S.r.l. shall provide the information required under Article 14 GDPR in the cases and according to the procedures provided for by applicable legislation.

4. PURPOSES OF PROCESSING AND RELATED LEGAL BASES

Personal data are processed for the following purposes:

A. Pre-contractual activities

Data may be processed for:

- responding to commercial enquiries;
- preparing and sending quotations;
- acquiring and exchanging information concerning products and services;
- carrying out preliminary assessments prior to entering into a contract;

managing purchase or supply requests.

Legal basis: Article 6(1)(b) GDPR, where processing is necessary for the performance of pre-contractual measures taken at the request of the data subject.

B. Management and performance of contractual relationships

Data may be processed for:

- entering into and managing contracts;
- order management;
- supply management;
- management of operational communications;
- management of contractual documentation;

assistance and management of the commercial relationship.

Legal basis: Article 6(1)(b) GDPR.

C. Compliance with legal obligations

Data may be processed to comply with obligations established by applicable legislation, including, by way of example:

- administrative obligations;
- accounting obligations;
- tax obligations;
- civil-law obligations;
- document retention obligations;

requests from competent public authorities.

Legal basis: Article 6(1)(c) GDPR.

D. Protection of the Controller's rights

Data may be processed for:

- establishing, exercising or defending a right;
- managing disputes and claims;
- preventing and combating fraudulent activities;
- recovering outstanding debts;

managing judicial or extrajudicial disputes.

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

The legitimate interest pursued consists of protecting the assets, rights and legitimate interests of All-Food S.r.l., as well as ensuring the proper management of commercial and contractual relationships.

5. NATURE OF THE PROVISION OF DATA

The provision of personal data necessary for the management of a pre-contractual or contractual relationship is, depending on the circumstances, necessary to enable All-Food S.r.l. to respond to the request, establish the relationship or fulfil the obligations arising from the contract.

Failure to provide the necessary data may result in the total or partial impossibility of establishing or managing the commercial or contractual relationship.

The provision of any data that are not necessary for such purposes remains optional.

6. PROCESSING METHODS

Personal data are processed in compliance with the principles of lawfulness, fairness, transparency, data minimization, accuracy, storage limitation, integrity and confidentiality established by the GDPR.

Data may be processed through:

- IT systems;
- electronic systems;
- cloud platforms;
- CRM systems;
- e-mail;
- paper records;

other tools suitable for managing the company's activities.

Processing is carried out through appropriate technical and organizational measures designed to ensure a level of security proportionate to the risk.

7. AUTHORIZED PERSONS AND DATA RECIPIENTS

Personal data may be processed by personnel of All-Food S.r.l. authorized to process such data and appropriately instructed in accordance with applicable legislation.

Data may also be disclosed, to the extent strictly necessary for the respective purposes, to external parties carrying out activities connected with or instrumental to the Company's activities.

By way of example:

- accountants and tax advisors;
- employment consultants;
- IT consultants;
- IT and cloud service providers;
- banks and financial institutions;
- debt collection companies;
- law firms;
- professional consultants;
- administrative service providers;

- communication service providers;

competent public and administrative authorities.

Where necessary, parties processing personal data on behalf of All-Food S.r.l. are formally appointed as **Data Processors pursuant to Article 28 GDPR**.

An updated list of Data Processors may be requested from the Data Controller.

Personal data are **not disseminated**, meaning that they are not made available to unspecified or indeterminate recipients.

8. TRANSFER OF DATA TO THIRD COUNTRIES

For the management, storage and organization of company documentation, All-Food S.r.l. uses cloud services and IT tools provided by third parties, including Google Workspace, provided by Google Ireland Limited.

Within the configuration adopted by All-Food S.r.l., the geographical region for the storage of data "at rest" has been set to Europe (Data Region: Europe).

This setting is intended to ensure that data covered by the relevant localization policy are stored, when "at rest", within the European geographical region provided for by the service. Google Workspace provides specific data-region management functionalities for certain plans and services.

Should the provision of services used by All-Food S.r.l. require the transfer of personal data to a third country pursuant to Chapter V of the GDPR, such transfer shall be carried out on the basis of one of the mechanisms provided for by applicable legislation, including:

- an adequacy decision adopted by the European Commission pursuant to Article 45 GDPR;
- Standard Contractual Clauses (SCCs) adopted by the European Commission pursuant to Article 46 GDPR;

another valid transfer mechanism provided for under Articles 46 et seq. GDPR, where applicable.

Google Workspace provides a Cloud Data Processing Addendum (CDPA) governing, among other things, data protection and international transfers and incorporating the contractual safeguards required under European legislation, including the Standard Contractual Clauses, where applicable.

With regard to any transfers to the United States of America, where applicable, the adequacy decision relating to the EU-U.S. Data Privacy Framework may apply, provided that the recipient is covered by the relevant certification and the conditions established by applicable legislation are met.

All-Food S.r.l. therefore adopts, for the cloud services it uses, measures and configurations aimed at reducing the risk of unnecessary international transfers and verifies, to the extent within its responsibility, the contractual conditions, privacy safeguards and processing arrangements applicable to its suppliers.

International data transfers are governed by Articles 44 et seq. of Regulation (EU) 2016/679.

9. DATA RETENTION PERIOD

Personal data are retained for the period necessary to achieve the purposes for which they were collected and, thereafter, for the period necessary to comply with legal obligations and protect the rights of the Data Controller.

In particular:

Data relating to contractual, administrative and accounting relationships

Data are retained for the period required by applicable civil, tax and administrative legislation and, indicatively, for a period of **10 years**, unless:

- longer retention periods are required by law;
- there are ongoing or foreseeable disputes;
- investigations are being conducted by competent authorities;

it is necessary to establish, exercise or defend a right.

Data relating to pre-contractual relationships

Where no contractual relationship is established, data are retained for the period necessary to manage the request and, subsequently, for the period necessary to document the activities carried out and protect the rights of the Data Controller.

10. AUTOMATED DECISION-MAKING AND PROFILING

All-Food S.r.l. does not carry out processing based on automated decision-making, including profiling, which produces legal effects concerning the data subject or similarly significantly affects them, within the meaning of Article 22 GDPR.

11. DATA SUBJECTS' RIGHTS

The data subject may exercise, in the cases provided for by applicable legislation, the rights recognized under Articles 15–22 GDPR and, in particular:

- obtain confirmation as to whether or not personal data concerning them are being processed;
- obtain access to their personal data;
- obtain information concerning the purposes of processing, categories of data, recipients and retention period;
- obtain the rectification of inaccurate data;
- obtain the completion of incomplete data;
- obtain the erasure of data in the cases provided for by Article 17 GDPR;
- obtain restriction of processing in the cases provided for by Article 18 GDPR;
- object to processing in the cases provided for by Article 21 GDPR;
- receive their personal data in a structured, commonly used and machine-readable format and transmit them to another controller, in the cases provided for by Article 20 GDPR;

withdraw any consent previously given, without affecting the lawfulness of processing carried out prior to its withdrawal.

The above rights may be exercised within the limits and under the conditions established by applicable legislation.

12. HOW TO EXERCISE DATA SUBJECT RIGHTS

To exercise their rights, the data subject may contact the Data Controller:

ALL-FOOD S.R.L.

Piazza Arnolfo di Cambio, 25

53034 Colle di Val d'Elsa (SI), Italy

E-mail: office@all-food.it

PEC: all-food@pec.it

Where necessary, the request must enable the Data Controller to verify the identity of the requester.

All-Food S.r.l. will respond to the request within the time limits established by applicable legislation.

13. RIGHT TO LODGE A COMPLAINT

If the data subject believes that the processing of their personal data is carried out in violation of the GDPR or applicable legislation, they have the right to lodge a complaint with the competent supervisory authority pursuant to Article 77 GDPR.

For Italy, the supervisory authority is:

Garante per la protezione dei dati personali

The data subject also retains the right to seek judicial remedy in the cases provided for by Article 79 GDPR.

14. UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice may be amended or updated as a result of:

- changes in legislation;
- organizational changes;
- introduction of new processing activities;
- changes to the services used;

changes to data processing methods.

The updated version will be made available through the channels deemed appropriate by the Data Controller.

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