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LUCE 5

Customers, suppliers and other external contacts

Privacy notice (Articles 13 and 14 GDPR)

Privacy notice for contact persons and staff of customers, prospective customers and suppliers, for customers and suppliers who are natural persons and for visitors to the premises of Luce5 S.r.l.

1 Who this notice is for

This notice, provided under Articles 13 and 14 of Regulation (EU) 2016/679 (the «GDPR»), concerns:

- contact persons and staff of customers, prospective customers, suppliers and subcontractors: owners, management, purchasing, administration, technical departments, designers, technicians and construction site workers;
- customers and suppliers who are natural persons, including sole traders and professionals;
- visitors to the premises.

2 Controller

The controller is **Luce5 S.r.l.**, Via Fratelli Alinari 9/11, 52025 Montevarchi (AR), Italy, VAT number 01910850518. For questions about the processing of personal data and to exercise your rights, write to Privacy, privacy@luce5.it, or by post to the registered office (contact details at the end).

3 Personal data processed and their sources

Luce5 processes only the data needed for the relationship:

- contact and work data: name, surname, company, job title, email, telephone;
- contractual and administrative data: quotation requests, offers, orders, contracts, non-disclosure agreements, transport documents, invoices and payments; for natural persons and sole traders also tax code, VAT number, addresses and bank details;
- correspondence, including email messages exchanged with Luce5 and the related technical data (sender, recipient, date and time);
- for suppliers' technicians who work on Luce5's systems: user accounts, authorisations and records of accesses;
- for subcontractors' staff working on construction sites: the documents required for access (name, qualification, safety training certificates, identification badge);
- for visitors: name, surname, company, person visited, entry and exit times and, for visits to restricted areas, the signed non-disclosure agreement.

As a rule, Luce5 does not process special categories of data (for example health data) or data relating to criminal offences of these persons.

Sources. The data of contact persons and staff of customers, suppliers and subcontractors are provided to Luce5 by the customer, supplier or subcontractor or by the person concerned, for example with a business card, at a trade fair or in correspondence; the data of prospective customers may also come from public professional sources, such as company websites. Other data are provided by the person concerned or, in the event of a dispute, by counterparties, lawyers and authorities.

4 Purposes, legal basis and retention

For each purpose, the table states the legal basis (Article 6(1) GDPR) and how long the data are kept. The legal bases are indicated as follows:

- **contract**: performance of a contract to which the person is party or pre-contractual steps taken at their request (point (b)), as for customers and suppliers who are natural persons; for contact persons and staff of a company, who are not party to the contract, the basis is instead Luce5's legitimate interest in managing the relationship with the customer or supplier (point (f));
- **legal obligation**: compliance with an obligation laid down by law (point (c));
- **legitimate interest**: an interest of Luce5 stated in the table (point (f)); you may object (section 8).

Purpose	Legal basis	Retention
Relations with customers and suppliers: requests for information and quotations, including those collected at trade fairs and events; offers and negotiations; contracts and non-disclosure agreements; design, production, deliveries, installation and support; selection and qualification of suppliers, including the check of the guarantees of those who process data on behalf of Luce5; subcontracting; photographic documentation of the work	Contract. Legitimate interest in developing business contacts, choosing suppliers and documenting the work. Legal obligation for the check of suppliers who process data on behalf of Luce5 (Article 28 GDPR)	Contracts, non-disclosure agreements, project and qualification documents: 10 years from the end of the relationship or project; for non-disclosure agreements, from the end of the obligation, if it lasts longer. Offers not accepted and contacts not followed up: 48 months from the last contact, after which the personal data are deleted and the offer is kept without them. Photographs of the work: as long as they are needed for maintenance and support
Customers' construction sites and shops: documents for access to customers' construction sites and shops, including those of subcontractors' staff; safety obligations on construction sites	Legal obligation for safety on construction sites (Italian Legislative Decree 81/2008). Legitimate interest in complying with customers' access and safety rules	Lists and documents for access: until the end of the site. Construction site safety documents: 10 years from the end of the works
Administration and funding: master data, invoicing, payments and collections, relations with banks, accounting; applications and reporting for calls for funding and grants	Legal obligation (Article 2220 of the Italian Civil Code and tax rules). Contract. Legitimate interest in obtaining funding and reporting on it	Master data, invoices and other accounting and tax documents: 10 years from the last entry, longer if tax assessments are in progress. Documents of calls for funding and grants: until the end of the checks provided for by the call
Complaints, disputes and debts: complaints and claims, including under warranty; legal advice and disputes; debt collection	Contract. Legal obligation for procedural requirements. Legitimate interest in protecting Luce5's rights and collecting debts	10 years from the closure of the matter or the settlement of the dispute

Purpose	Legal basis	Retention
Visitors to the premises: registration of entry and exit at reception, in a paper register, for the safety of people and premises and to know who is present in an emergency; non-disclosure agreements for visits to restricted areas	Legitimate interest in the safety of people and premises. Contract or legitimate interest in protecting know-how, for non-disclosure agreements	Registrations: 12 months. Non-disclosure agreements: 10 years from the end of the confidentiality obligation
Security and data protection: access by suppliers' technicians to Luce5's systems, remote or on site; security logs, including those of system administrators' accesses; operation and security of email; replies to requests from data subjects; handling of incidents and personal data breaches; checks on the use of company tools, which may also involve correspondence with external contacts	Legal obligation (Articles 12 to 22 and 32 to 34 GDPR; measure of the Italian Data Protection Authority on system administrators). Legitimate interest in protecting systems, data and company assets and in operating the services	Technicians' access requests: up to 6 months after the contract expires. Logs: for as long as necessary, according to the settings of each system; those of system administrators' accesses at least 6 months, where the systems allow it. Files on requests, incidents and checks: 5 years from closure

When the period expires, the data are deleted or anonymised. A period is extended only for the data needed for a dispute, a request from an authority, the investigation of an incident or a request for restriction from the person concerned. Correspondence documenting a matter, including email messages, is saved in the matter's folder and follows its period; contact persons' details are updated when the contact person changes. Backup copies follow their own rotation: a deleted item remains in them until the copy expires.

For these purposes Luce5 uses its own IT systems and services and may use the artificial intelligence tools it has authorised, within the limits of the non-disclosure agreements and contracts with customers.

Marketing communications. Luce5 sends marketing communications and event invitations by email only to those who subscribe to the newsletter, with the website form or with the customer data form. The basis is consent (Article 6(1)(a) GDPR; Article 130 of the Italian Personal Data Protection Code), which can be withdrawn at any time with the link in every message or with the unsubscribe form on the website. Details are in the newsletter section of the website privacy notice (P008I).

Video surveillance. The areas of the premises covered by the cameras are marked by signs. The rules are set out in the video surveillance notice (P001I), available at reception and on request from privacy@luce5.it.

5 Obligation to provide the data

The data requested are necessary to conclude and perform contracts, to comply with legal obligations and, for visitors, to enter the premises: without them Luce5 cannot start or continue the relationship or allow access. Apart from the newsletter subscription, which is optional, the processing described in this notice does not require consent.

6 Recipients

Within Luce5 the data are accessible only to authorised persons, for their duties. The following may receive the data, each only the data they need:

- suppliers who process the data on behalf of Luce5 as processors (Article 28 GDPR): support for the IT systems and the management software, email, collaboration and storage services, including cloud services, backup and IT security, authorised artificial intelligence tools;
- Luce5's advisers (accountant, statutory audit firm, notary, law firms), as processors or as independent controllers depending on the engagement;

- parties that process the data as independent controllers: banks, the tax authorities (electronic invoicing), debt collection agencies, couriers and forwarders, subcontractors and installers, commissioning customers, shopping centre managers and construction site safety coordinators, bodies providing funding;
- public authorities, judicial authorities, law enforcement agencies and the Italian Data Protection Authority, in the cases provided for by law.

The data are not disseminated.

7 Transfers outside the European Economic Area

As a rule, the data are processed in the European Economic Area. Some cloud services (collaboration and video conferencing, artificial intelligence tools) may involve processing of data outside the European Economic Area: in these cases the transfer takes place only on the basis of an adequacy decision of the European Commission or of the standard contractual clauses adopted by the Commission (Articles 45 and 46 GDPR). For projects and construction sites outside the European Union the necessary data are disclosed to the parties in the country of destination with the same safeguards or, where they apply, under the derogations of Article 49 GDPR, for example because they are needed to perform a contract. A copy of the safeguards can be requested from privacy@luce5.it.

8 Rights and complaints

Right to object. Every person may object at any time, on grounds relating to their particular situation, to the processing based on Luce5's legitimate interests listed in the table in section 4 (Article 21 GDPR). Luce5 then stops processing their data, unless it demonstrates compelling legitimate grounds that override their interests, rights and freedoms, or the data are needed for the establishment, exercise or defence of legal claims.

Other rights. Every person may ask Luce5 for access to their data and a copy, rectification, erasure (except for data that Luce5 must keep by law or to defend a right), restriction of processing and, for data provided under a contract and processed by automated means, portability (Articles 15 to 20 GDPR). If they have given consent, as for the newsletter, they may withdraw it at any time, without affecting earlier processing.

Requests and objections are sent to privacy@luce5.it or by post to the registered office and are free of charge. Luce5 replies within one month, extendable by two months in complex cases (Article 12 GDPR). Anyone who considers that the processing infringes the GDPR may lodge a complaint with a supervisory authority, in particular in the EU Member State of their habitual residence, place of work or place of the alleged infringement (Article 77 GDPR); in Italy this is the Garante per la protezione dei dati personali (www.garanteprivacy.it). They may also apply to the courts (Article 79 GDPR).

Luce5 does not take decisions based solely on automated processing, including profiling.

9 Where to find this notice

The notice, in Italian and English, is published on the Luce5 website and can be requested from privacy@luce5.it; for visitors it is also available at reception. Luce5 asks companies that provide it with the data of their staff to make this notice known to the persons concerned. Luce5 updates it when the processing changes; the date of the latest version is shown at the top.

Contacts

Personal data protection matters:

Office	Privacy
Email	privacy@luce5.it

Version history

Date	Author	Description
28/10/2026	IT Management	First issue: single notice for customers, suppliers and visitors, with purposes, legal bases and retention in one table
30/10/2026	IT Management	Revision 1: wording on the source of the data and on the legal basis for contact persons revised