

CUSTOMER AND SUPPLIER

PRIVACY NOTICE

With this notice, the Controller intends to communicate to customers and suppliers on the processing of their Personal data.

The O-I entity, as defined in Annex 1, is the data controller (the “Company” or “Controller”) and collects and processes Personal data that the customers and suppliers are providing, or that are otherwise acquired as part of the Company’s business relationships.

Personal data are collected and processed in full compliance with Applicable laws, ensuring that the rights and freedoms of Data subjects are protected.

KEY DEFINITIONS	
Applicable laws	The data protection laws applicable in the country where the Controller operates, including Regulation (EU) 2016/679 (the “EU GDPR”).
Data subject(s)	Individuals acting on behalf of a supplier or customer, including directors, employees, collaborators, consultants and agents.
Personal data	Any information relating to an identified or identifiable individual. An individual may be identified directly, for example by their name, or indirectly through information that, alone or in combination with other information, could reveal their identity, such as a certified email address or job title.

TYPE OF PERSONAL DATA PROCESSED

The Controller may collect the following categories of Personal data:

CATEGORY	PERSONAL DATA
Identification data	First name, last name
Professional information	Job title, role
Contact details	Phone number, certified email address
Data necessary for the conclusion and execution of the contract	VAT number, IBAN

PURPOSES AND LEGAL BASIS OF THE PROCESSING

The Company, through its activities, will process Personal data for the following purposes:

- Management of pre-contractual requirements
- Management and execution of the contractual relationship with consequent fulfilment of the related obligations
- Administrative management, such as invoicing and order management
- Exercise of the Data Controller's rights, such as the right of defence in court, or in the event of any judicial and extrajudicial disputes
- Management of collections, payments and communications to and from credit, financial and insurance institutions

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- Filing of documents as required by current legislation
- Processing of statistics, management control, industrial accounting

While the provision of the data is optional, not providing them and/or expressly refusing to process the data may make it impossible for the Company to continue the contractual relationship between the parties.

The Personal data processing is based on:

LEGAL BASIS	APPLICATION
Contract necessity	To comply with pre-contractual and contractual obligations as per Art.6 (b) EU GDPR
Legal obligation	To comply with laws and regulations as per Art.6 (c) EU GDPR
Legitimate interest	For business needs that do not override Data subjects' rights as per Art.6 (f) EU GDPR

As the purposes mentioned hereabove are included in the legal and economic execution of the contractual relationship, the consent of the Data subject is not required for the processing of the data.

METHODS OF PROCESSING AND DATA RETENTION LIMITS

The data will be collected and processed lawfully, fairly, and adequately to what is necessary to the purposes hereabove, using secure technical and organisational measures to protect the confidentiality and rights of the Data subject against unauthorized access, loss or misuse.

The Controller will only use Personal data for as long as is necessary for the management and execution of the contractual obligations, as well as for the compliance with Applicable laws, respecting the principles of storage limitation and minimization.

DISCLOSURE – COMMUNICATION OF THE PERSONAL DATA

For the pursuit of the purposes described in this notice, Personal data will be disclosed to employees, assimilated personnel and collaborators of the Controller, who will act as persons authorized to process Personal data.

In addition, Personal data will be processed by third parties belonging to the following categories:

- O-I group companies;
- Parties which, for different reasons, the Data Controller uses for the performance of the contract;
- Companies managing the Data Controller's computer system;
- Parties that manage administrative and tax fulfilments for the Data Controller;

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- Companies and consultants providing legal services;
- Authorities and supervisory and control bodies, and in general public or private entities with public functions.

Subjects belonging to the above categories act, in some cases, in total autonomy as distinct data controllers, and in other cases as data controllers specifically appointed by the Data Controller.

TRANSFER ABROAD

As the Company operates globally, Personal data may be transferred within and outside the European Economic Area (“EEA”) for the purposes of the processing.

If Personal data are transferred outside the EEA, either within O-I group of companies or to third parties, the Controller will ensure compliance with Applicable laws and require recipients to maintain equivalent security standards. This specifically includes countries whose level of protection of Personal data may differ from the one within the EEA.

Where this is the case, only data necessary for the stated purposes will be transferred, and all required safeguards (such as Standard Contractual Clauses) will be implemented for transfers to third countries, in total compliance with Applicable laws.

For transfers within O-I group, a Data Processing Agreement and Standard Contractual Clauses are in place along appropriate technical and organizational measures.

RIGHTS OF THE DATA SUBJECT

Pursuant to the Applicable laws, the Data subject may, at any time, assert right to:

RIGHT	DESCRIPTION
Access	Access Personal data and obtain information about its usage and storage
Rectification	Rectify inaccurate Personal data
Deletion	Ask for the deletion of Personal data
Restriction	Restrict how Personal data are processed, where possible
Objection	Object to processing based on legitimate interests or direct marketing
Complaint	Lodge a complaint with the local Data Protection Authority

Regarding the right to object, the Data subject may exercise it on grounds relating to their particular situation and at any time, to oppose the processing of their Personal data which is based on a balancing of interests, including profiling.

It is important to note that the above rights may be restricted by national data protection legislation.

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For the purpose of exercising the rights referred to hereabove, as well as for any clarifications, interested parties may contact the Company at the following email address: **privacy.notice.eu@o-i.com**.

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ANNEX 1 : O-I entities name with their registered office and relevant DPA

O-I ENTITY	REGISTERED OFFICE	DATA PROTECTION AUTHORITY	CONTACT / WEBSITE
O-I France SAS	2 rue Maurice Moissonnier, 69120 Vaulx-en-Velin France	Commission nationale de l'informatique et des libertés (CNIL)	https://www.cnil.fr/fr/saisir-la-cnil/nous-contacter
Vidrieria Rovira S.L.	Sector C - Calle D, Numero I ALL 5, Barcelona, Barcelona, 08040, Spain	Agencia Española de Protección de Datos (AEPD)	https://www.aepd.es/en/about-aepd/how-can-we-help-you
O-I Italy S.p.A.	Via I° Maggio n°18, 21040 Origgio, Italy	Garante per la Protezione dei Dati Personali (GPDP)	Home - Garante privacy en - Garante Privacy
O-I Hungary Limited	Csorvasi, 5 5900 Oroshaza Hungary	Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)	https://naih.hu/
O-I Glass Limited	Edinburgh Way Harlow Essex CM20 2UG UK	Information Commissioner's Office (ICO)	https://ico.org.uk/global/contact-us/
O-I Germany GmbH & Co. KG	Goethestrasse 75 40237 Dusseldorf, Germany	Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen (LDI NRW)	https://www.ldi.nrw.de/kontakt
O-I Czech Republic a.s.	Ruska 113/80 41703 Dubi u Tuplic Ustecky Kraj, Czech Republic	Úřad pro ochranu osobních údajů (ÚOOÚ)	https://uoou.gov.cz/en/consultation/contact
O-I Poland SA	ul. Morawska I 37500 Jaroslaw, Poland	Urząd Ochrony Danych Osobowych (UODO)	https://uodo.gov.pl/en/p/contact

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O-I Estonia AS	Tehaste 7, 79101 Jarvakandi, Rapla Maakond, Estonia	Andmekaitse Inspektsioon (AKI)	Contacts Andmekaitse Inspektsioon
O-I Netherlands B.V	Spoorstraat 7 3112HD SCHIEDAM PAYS-BAS	Autoriteit Persoonsgegevens (AP)	Contact Autoriteit Persoonsgegevens