

Supplier Privacy Notice

Prepared 18 September 2026 | English version

Purpose

This notice covers personal data concerning suppliers, contractors, consultants, service providers and their individual contacts, personnel, directors and authorised representatives in connection with procurement, deliveries, shipyard access and contract administration. It does not impose procurement terms or replace the relevant supply agreement.

1 Controller and scope

TUREDDI GROUP LIMITED is incorporated in England and Wales under company number 15210693, with its registered office at 35 Dover Street, Mayfair, London, W1S 4NQ, United Kingdom. It operates internationally, including through its permanent establishment in Italy (Codice Fiscale 91066550467) and shipyard operations in the Kingdom of Bahrain. TUREDDI GROUP LIMITED is controller where it determines the purposes and means of the processing described here, including through its Italian permanent establishment. If a separate company engages a supplier and controls its information independently, that company must identify itself and provide the appropriate notice. The reference to Bahrain operations does not identify an unverified separate legal entity as controller. Legal and privacy enquiries: legal@tured digroup.com. Marketing and administration: administration@tured digroup.com. Postal correspondence may be addressed to the registered office, marked for the Legal Department.

2 Data and sources

We may receive names, business contact details, employer, role, qualifications relevant to the engagement, correspondence, proposals, purchase orders, delivery and performance records, signatures, invoicing and payment information. For sole traders, business and banking information can also be personal data. Where relevant and proportionate, we may request identity and authority information, corporate ownership information and legally required safety or access documentation.

We obtain information from the individual, their employer, contracting supplier, project counterparties, public registers and lawful verification sources. Any site-specific CCTV, biometric or health-related processing requires its own assessment and appropriate information; this notice does not assert that those systems are installed. Suppliers should pass this notice to relevant personnel whose details they provide, without relieving TUREDDI of its own duty to inform them.

3 Purposes and lawful grounds

Supplier selection, quotation review, contract administration, delivery coordination and performance management rely on legitimate interests in operating our procurement and yacht-building activities. Contract necessity applies where the individual is personally a party to the contract or requests pre-contractual steps.

Accounting, taxation and legally required safety or compliance records rely on the applicable legal obligation. Fraud prevention, verifying authority, protecting property, managing access and resolving disputes may rely on legitimate interests, unless a specific legal obligation applies. Any special-category information requires an additional lawful condition, identified before it is collected. We do not rely on this notice as consent to all supplier processing.

4 Recipients and international handling

Information is limited to personnel who need it in procurement, finance, operations, project management, safety, IT or legal functions. Relevant recipients may include banks, auditors, insurers, professional advisers, IT and communications providers, logistics providers and project counterparties who need information to coordinate the work. Authorities receive information where required or otherwise lawfully justified. Providers acting as processors must have appropriate contractual obligations.

Personal data may be accessed or handled in the United Kingdom, Italy and, where necessary for the relevant project, Bahrain, as well as countries where our service providers operate. A business presence in a country does not itself authorise a data transfer. Where a transfer is restricted by applicable law, we must use an applicable adequacy decision or appropriate safeguards, such as the EU Standard Contractual Clauses and the UK International Data Transfer Agreement or UK Addendum, as appropriate, with the required assessment and supplementary measures. You may contact us for information about relevant safeguards and a copy, subject to necessary redactions.

5 Retention and security

Unsuccessful quotations and onboarding records are retained while reasonably needed for procurement decisions, audit and potential disputes. Active supplier records are retained during the relationship and for the necessary warranty, claims, accounting and tax periods afterwards. Access and safety records follow the relevant site purpose and any applicable statutory requirement. Identity evidence is limited to what is necessary and must not be retained merely because it was collected. Legal holds can apply to identified records. We delete or anonymise information when its justified retention ends.

Access is restricted by role and information must be handled through suitable systems and channels. Verify bank-detail changes using an established contact independent of the change request. Ask for an appropriate secure channel before sending sensitive documents. No email system can guarantee absolute security.

6 Rights and complaints

Depending on the applicable law and circumstances, you may request access, correction, erasure, restriction and portability of your personal data, and object to processing based on legitimate interests. You may object to direct marketing at any time. Where we rely on consent, you may withdraw it without affecting the lawfulness of earlier processing. Contact legal@tured digroup.com; we may request proportionate information to verify identity. We respond within the applicable statutory period, generally one month under the UK GDPR or EU GDPR, subject to lawful extensions and exceptions. You may complain to the UK Information Commissioner at ico.org.uk, the Italian Garante at garanteprivacy.it, or another competent supervisory authority, including in your EU country of residence, work or the alleged infringement. Contacting us first is not a condition of that right.

7 Providing data and further uses

We identify information required for legal obligations or administration of the engagement. Without it, we may be unable to approve a supplier, arrange access, accept delivery or process payment. Optional information must be identified as such. Supplier status does not constitute consent to marketing.

This notice does not authorise solely automated decisions with legal or similarly significant effects. Any introduction of such processing, or materially different purposes, requires the relevant legal assessment and further notice. Where information comes indirectly, we provide this notice within the applicable period, normally no later than one month and earlier where required by the first communication or disclosure. Legal and privacy enquiries: legal@tured digroup.com. Marketing and administration: administration@tured digroup.com. Postal correspondence may be addressed to the registered office, marked for the Legal Department.