

PRIVACY

ADVISORY NOTE ON THE PROCESSING OF PERSONAL DATA FOR ACCESS TO THE RESERVED AREA (WITH POSSIBLE REQUEST THAT THE NEWSLETTER BE SENT)

Pursuant to art.13 of EU Regulation 2016/679 of 27/04/2016

Dear Sir / Madam

Pursuant to article 13 of EU Regulation 2016/679 of 27/04/2016, hereinafter the **GDPR** (General Data Protection Regulation), Meneghetti S.p.A., with registered offices at via Borgo Lunardon 8, Rosà (VI), Italy, as the Controller (in terms of processing personal data), informs you of the following:

The Controller and Processor (in terms of processing personal data)

The Controller is Meneghetti S.p.A. with registered offices at via Borgo Lunardon 8, Rosà (VI), Italy.

The data that is collected

We collect and process personal data about you when you send, via our internet site, a request to be authorised to access the reserved area on our corporate site.

The personal data that we process includes:

- your first name and last name;
- your email address;
- your telephone number;
- your town or city and/or country of residence;
- the company you work for.

The legal basis for processing personal data

Processing your personal data is done in view of your willingness to freely send us a request to access the reserved area of our site, for which access credentials need to be obtained. If you wish, you can request that our periodic newsletter be sent to you. It is your free choice that you may express by selecting the relative option on the page where you enter your data and that, if expressed, represents consent to being sent periodic communications that may also be generic or specific based on the residence information you provide.

This consent may be revoked through the specific link at the end of each communication sent, or by contacting the Controller through one of the communication channels indicated in the section "The data subject's rights".

How we use this information

We process the personal data specified in the section "The data that is collected" in order to create the access credentials to the reserved area, subject to a positive assessment by our personnel assigned to evaluate the requests received. In respect of your privacy, no information will be made public regarding your last name or your email address. In the case that you consent to being sent communications, we will use this data to send you our periodic communications.

The mandatory or optional nature of providing data and the consequences of any refusal to provide personal data

Providing data is optional although any refusal to provide the data requested may make it impossible for the company to manage your request or to proceed with any assignment of the access credentials to the site's reserved area.

The sources of the data collected

The company obtains this information directly from you, as you enter the data in the online form available on the dedicated page of the corporate site.

Methods of processing personal data

Processing personal data is done by those means of operation indicated in art. 4(2) of the GDPR, for the purposes referred to above, both on paper as well as electronic means, by electronic instruments or, in any case, automated ones, in compliance with relevant legislation in effect and specifically regarding confidentiality and security and in accordance with the principles of correctness, lawfulness and transparency and safeguarding the rights of the person.

Processing is carried out directly by the Controller's organisation, by its processors and/or appointees.

Communicating and divulging personal data

Your personal data may be communicated, to the extent strictly pertinent to the obligations, tasks and purposes referred to above and in compliance with relevant legislation in effect, to the following categories of subjects:

- ! Internal collaborators, other companies within the group, subsidiaries and parent companies, for the purposes of managing your request and to provide you with an adequate response.

Personal data will not, in any way whatsoever, be divulged.

The period for which personal data is stored

Data collected will be stored for as long as the reasons for which it was collected are applicable, or until you notify us that you no longer wish to access our reserved area. Data used to send you our newsletter (if you had requested it) will be stored until you notify us that you wish to revoke your consent, previously given, to the processing of this data, sent by one of the channels in the section "The data subject's rights" or through the cancel subscription command found at the end of each communication sent. Following this communication, we will stop sending you any communications and will delete your data within 6 months.

Transferring data

Personal data is stored on servers located within the European Union. It remains understood, in any case, that the Controller, where deemed necessary, will have the right to transfer data onto other servers even ones outside of the EU. In this case, the Controller hereby guarantees that the transfer of data to a non-EU country will be done in compliance with applicable legislation.

Automated decision-making

The Controller declares that the contents of the newsletter which will be delivered may be determined by the residence information you provide when you enter your request. No other decisions are envisaged based exclusively on the automated processing of your personal data.

The data subject's rights

As a data subject, you have those rights provided for under art. 15 of the GDPR and, specifically, you have the right to:

- 1) obtain from the Controller confirmation or otherwise that the personal data that concerns you is subject to processing and, if this be the case, to obtain access to the personal data and to the following information:
 - a. the purposes for which processing is done;
 - b. the categories of personal data in question;
 - c. the recipients or categories of recipients to whom personal data has been or will be communicated, in particular if these recipients are in a third country or are international organisations;
 - d. when possible, the expected period for which personal data will be stored or, if this is not possible, the criteria used to determine such a period;
 - e. the existence of the data subject's right to request that the Controller rectifies or deletes the personal data or limits processing of the personal data that concerns the data subject or to object to such processing;
 - f. the right to lodge a complaint with a supervisory authority;
 - g. if the personal data is not collected directly from the data subject him/herself, all the information available on the origin(s) of such data;
 - h. the existence of an automated decision-making process, including profiling, as referred to in article 22(1) and (4) and, at least in these cases, relevant information on the logic used, as well as the importance and consequences of such processing for the data subject.
- 2) If personal data is transferred to a third country or to an international organisation, the data subject has the right to be informed of the existence of adequate guarantees as per article 46 regarding the transfer.
- 3) The Controller provides a copy of the personal data which is subject to processing. In the event of further copies being requested by the data subject, the Controller may charge a reasonable fee based on the administrative costs. If the data subject makes a request by electronic means, and unless otherwise indicated by the data subject, the information is provided in a commonly-used electronic format.
- 4) The right to obtain a copy of the personal data, as per paragraph 3, shall not impinge on the rights and freedoms of others.
- 5) Where applicable, you also have those rights referred to in articles 16-21 of the GDPR (Right to rectification, right to erasure, right to restriction of processing, right to data portability, right to object), as well as the right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

In order to exercise your rights as referred to in art. 15 of the GDPR or for questions or information regarding the processing of your personal data and the security measures adopted, you may, in any case, contact:

MENEGHETTI S.P.A.
VIA BORGO LUNARDON 8
36027 ROSA' (VI)
E-mail: info@fulgor-milano.com