

## PRIVACY POLICY

### EX ART. 13 LEGISLATIVE DECREE no. 196/2003 (Personal Data Protection Code) and EX ART. 13 REGULATION (UE) 2016/679

**MIAT S.p.A.** (hereafter also “The Company”), is a joint-stock company with registered and operating office in 20159 Milano (MI), Via Luigi Federico Menabrea 20, as Data Controller, shall inform you about the data processing purposes, its methods and the processing logic or any other information about the data processing.

#### TYPE OF PROCESSED DATA

The personal data involved in the processing are identification data (e.g. name, surname, tax code/VAT number), administrative, accounting and fiscal, commercial, eventually digital/IT data, directly referred to the customer or the supplier or to the data subjects (such as employees and any natural person acting under the customer’s authority) from customer or supplier and /or them communicated in execution and in the performance of commercial and /or contractual relations with MIAT itself.

#### TYPE OF DATA SUBJECT INVOLVED

The type of data subjects involved in the processing are the customer or the supplier or to the data subjects such as employees and any natural person acting under the customer’s authority.

#### PURPOSES OF DATA PROCESSING

In order to perform contract obligations (or to take steps to the request of clients prior to entering into a contract) and compliance with a legal obligation, the Company will process the personal data above mentioned.

In the case of contractual relationships and / or purchases made by the customer directly (also through the website), the Company inform you that the data provided (also through the appropriate form on the page dedicated to the website data entry) will be processed for the performance of the contractual obligations assumed (and / or necessary pre-contractual activities) or to answer to data subject’s requested information or to process the order request and for the purposes connected to and instrumental to its management and to the activities before and after the sale, including the management of any complaints.

#### CONFERRAL OF PERSONAL DATA

Notwithstanding the individual authority of the data subject/s, data conferral is:

a) mandatory (in compliance with laws, norms, regulations, both domestically and in the EU);

b) strictly necessary (in order to perform the Company business activities, to open and close business relations, to continue and to manage already existing contracts). The denial to submit such data may imply the impossibility for the Company to duly execute the contract or to comply with law, administrative, accounting and fiscal requirements.

#### **LEGAL BASIS OF DATA PROCESSING**

The legal basis of the data processing are performance of a contract to which the customer is party (and the data subject is an employee or any natural person acting under the customer's or supplier's authority) or in order to take steps at the request of the customer prior to entering into a contract and/or compliance with a legal obligation to which the Company is subject.

#### **METHODS OF DATA PROCESSING**

The data processing is executed manually, through electronic and digital and also traditional means (paper-based archives) by employees, free-lancers and natural persons acting under Company's and third entities' authority in charge of the processing within the limited scope of their relative functions and/or areas of activity, based on the released authorization and instructions, always and solely for the purposes above indicated. The data are stored in traditional archives (paper) and electronic record protected with appropriate security measures as requested by law. The same applies also to third parties to whom such data may be communicated to.

#### **DATA COMMUNICATION AND DISCLOSURE, RECIPIENTS**

The personal data collected will not be disclosed. Communication to third parties, other than the Data Controller, employees, co-workers, natural persons acting under the Company's authority and in charge of the processing, internal consultants and the appointed processors identified and duly appointed as required by law, is provided to public bodies for the fulfillment of the law, as well as, where necessary for the pursuit of the purposes indicated and in any case within the limits thereof, to third parties and companies, such as legal and sector consultants, credit institutions, insurance companies, debt collection companies and contractual consultancy, couriers and shippers, third-party companies providing technical and IT support, companies operating in the IT sector (Data Centers, Cloud Providers, companies providing IT services including back-up and / or maintenance of equipment and software , also applications, ect.), for security management - including IT - and data confidentiality; all engaged in the correct and regular pursuit of the purposes described, all established in the European Economic Area. In any case, processing by third parties must be carried out according to correctness and in compliance with the provisions of the law in force.

#### **DATA RETENTION**

The personal data will be kept strictly for the time necessary to carry out the administrative, accounting and fiscal purposes related to the contractual relationship between the Company and the customer/supplier and for the fulfillment of the related contract obligations and also descending from the obligations established by law, however within the prescription terms provided for by the law for the rights and obligations in connection with the personal data processing for the exercise of the rights arising from the contractual relationship even after its definitive termination and those that may be necessary for the definition of the *medio tempore* litigation arising meantime.

## **DATA SUBJECT'S RIGHTS**

The data subject may exercise the rights as per art. 7, 8, 9 e 10 D. Lgs. 196/2003 and as per Regulation UE 679/2016 (articles from 15 to 22), by contacting MIAT at the following addresses: MIAT S.p.A. S.p.A. with registered and operating office in 20159 Milano (MI), Via Luigi Federico Menabrea 20, email [privacy@miat.it](mailto:privacy@miat.it) telefax +39 02 69301160.

The data subject has the right – among others - to:

a) obtain:

- indications on the origin of the personal data, on the data processing purposes and methods, on the legal basis and on the logic applied in case of data processing effected through electronic instruments;
- indication of the identification details of both the Controller and Processors of the processing;
- indication about the parties or the party categories the data can be communicated to or that can know the data as representatives granted in the territory of the State, as responsible persons or persons in charge;
- indication about the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- an access to his/her data and the possibility to update, adjust or integrate them;
- the cancellation of his/her data without unjustified delay or the limitation of the processing;
- the portability of the data to be transmitted directly from one controller to another;
- proof that the operations here listed have been communicated also to any third party to whom the personal data had been disclosed (except if the burden of this duty is disproportional with regard to the risks associated to the right protected);

b) to lodge a complaint with a supervisory authority;

c) to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;

d) oppose, wholly or partially, at any time, to the proceeding of his/her data for the purposes of commercial information or of deliver of advertising material or of direct sales or for effecting market or commercial communication researches.

## **DATA CONTROLLER**

Data Controller is **MIAT S.p.A., with registered office in 20159 Milano (MI), Via Luigi Federico Menabrea 20.**

An updated list of internal contacts and external data processors, appointed by the Data Controller pursuant to Legislative Decree 196/2003 and art. 28 of Regulation (EU) 2016/679, is available at the registered office of the Company.

For each communication pursuant to the exercise of the rights and / or request of the data subject, the Company makes available the address [privacy@miat.it](mailto:privacy@miat.it) .