

PRIVACY POLICY PURSUANT OF ART. 13 OF THE EU REGULATION 2016/679

For our clients and/or their representatives

For us, personal data protection is a serious subject, so we would like to inform you about the way in which your data is processed and the rights you can exercise under current data protection legislation, in particular the EU Regulation 2016/679 (hereinafter also referred to as "GDPR").

1. Data Controller

MIFAR SRL
Via Valtellina n. 18/20, 20027, Rescaldina (MI)
E-mail: privacy@mifar.com
Phone: + 39 0331 515037

2. Categories of processed personal data

The categories of "personal data" (ex-art. 4.1 of the GDPR) processed by the Data Controller can be, as a non-exhaustive example:

- Identification data (e.g., name, place of birth, date of birth, social security number, VAT number, etc.);
- Contact data (e.g., address, e-mail address, telephone number, etc.);
- Whenever the data subject is a representative, data regarding her/his role in the company;
- Personal data connected to the buying of the Controller's products.

3. Legal basis and processing purposes

The processing of personal data will comply with the General Data Protection Regulation (GDPR) and with any other applicable law regarding data protection. Listed below are more details about data processing:

3.1 Purposes based upon a legal obligation (ex-art. 6, par. 1 (c) of the GDPR)

- a. Fulfillment of obligations established by Laws, Regulations and by European norms, or by ordinances imposed by the Authorities or by surveillance and control bodies, in relation or in any case connected with the present or future legal relationship (e.g., the regulation on corporate administrative liability as for d.lgs. 231/2001 and its amendments).

The data retention period for this section's purpose is:

For purpose a: 10 years from the end of the contractual relationship.

This retention period could be longer due to controversies or by laws influencing it.

3.2 Purposes based upon the performance of a contract or for precontractual measures (ex-art. 6, par. 1 (b) of the GDPR)

- a. Performance of precontractual activities, also regarding first contact and for the drafting and sending of estimations;
- b. Fulfillment of contractual obligations and legal agreements and, in particular, regarding the contract in being (e.g., order fulfillment);
- c. Management of the administrative, accounting, fiscal and financial processes connected to the product provided;
- d. Protection of contractual rights or of any right deriving from the contractual relationship between the parties.

The data retention period, in regard to the purposes listed in this section is:

For purpose a: until the end of precontractual activities;

For purposes b, c, d: 10 years from the end of the contractual relationship.

These retention periods could be longer due to controversies.

4. Recipients or categories of recipients of personal data (ex-art. 13 par. 1 (e) of the GDPR) *

In relation to the above listed purposes, the Data Controller could communicate personal data to:

- Internal offices and authorized personnel;
- Consultants for the management of accounting and accountants;
- Companies and professionals which provide IT services, including electronic data processing, software management, website management e IT consultancy;
- Surveillance and control bodies;
- Licensed professionals for the purpose of studying and resolving any legal and contractual issues;
- Transport companies, postal couriers, and companies engaged in enveloping and shipping products;
- Public Administrations, Agencies, Public Authorities and public bodies in general in the performance of their public duties.

** More information regarding recipients (ex-art. 4.9 of the GDPR) are available by contacting the Data Controller through the address above listed.*

5. Recipients or categories of recipients of the personal (pursuant of art. 13 paragraph 1(f) of the GDPR) e data transfer outside the EU

The Controller does not have the intention to transfer Your data in Countries which are not EU or EEA members for the aforementioned purposes.

6. Data Subject's rights (ex-art. 13 par. 2 (b) of the GDPR)

The data subject can exercise the following rights, in relation to personal data mentioned in this privacy policy, as stated by the GDPR:

- Right of access by the data subject [art. 15 of EU Regulation] (possibility to be informed on the treatments carried out on his personal data and, if necessary, receive a copy of them);
- Right to rectification [art. 16 of EU Regulation] (data subject has the right to rectify incorrect data concerning him);
- Right to erasure without unjustified delay ("right to be forgotten") [art. 17 of EU Regulation] (data subject has the right to delete his personal data);
- Right to restriction of processing, as provided by article 18 of EU Regulation, among the other cases, in case of illicit processing or contestation of the accuracy of personal data by the data subject [art. 18 of EU Regulation];
- Right to data portability [art. 20 of EU Regulation], (data subject has the right to receive the personal data concerning him/her, which he/she or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as provided by the same article);
- Right to object to processing [art. 21 of EU Regulation] (the data subject has the right to object processing of personal data as provided by article 21 of EU Regulation);
- Right to not be subject to automated individual decision-making [art. 22 of EU Regulation] (The data subject shall have the right not to be subject to a decision based solely on automated processing).

The above-mentioned rights can be exercised, as established by the GDPR, contacting the Data Controller to the above-mentioned contacts. The aforementioned rights can be exercised according to the provisions of the GDPR by also sending an e-mail to the following address: privacy@mifar.com.

MIFAR SRL, in compliance to art. 19 of the GDPR, when it is possible, communicate to the recipients, to which personal data has been transferred, any corrections, cancellations or limitation of processing as requested by the data subject.

7. Right to lodge a complaint (ex-art. 13 par. 2 (d) of the GDPR)

If the data subject considers that his/her right has been compromised, he/she has the right to lodge a complaint to the supervisory authority (or Data protection Supervisor), according to the methods indicated by the same authority. If you are Italian, you can refer to the following link: <http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524> or by lodging a complaint by mail to the Italian Authority for the Protection of Personal Data.

8. Potential consequences of failure to provide personal data and nature of the providing of data (art. 13 paragraph 2 (e) of the GDPR)

8.1 In case of compliance with a legal obligation to which the Data Controller is subjected to or for performing a contract

It must be known that when the purpose has, as a legal basis, a legal obligation or a contractual one (or even a precontractual one), the data subject must necessarily provide the required personal data.

On the contrary, it will be impossible for the Controller to proceed with the specific personal data processing purposes.

When data is no longer needed, it will be deleted. If its deletion is impossible or only possible with a disproportionate effort due to a particular storage method, the data cannot be processed and must be stored in inaccessible areas.

9. Presence of an automated decision-making process (included profiling activity)

The use of a purely automated decision-making processes as detailed by Article 22 of the GDPR is currently excluded. Should it be decided in the future to establish such processes on a case-by-case basis, the data subject will be notified separately if this is required by law or if this information notice is updated.

10. Methods of data processing

Personal data will be processed both in analog and electronic format and entered in the applicable data bases which can be consulted and processed by operators and processors designated by the Data Controller who will be able to carry out the consultation, use, handling, comparison and any other appropriate operation, direct or automatic, respecting the legal requirements necessary to guarantee the confidentiality and the security of the data, as well as their accuracy, updating, and their relevancy to the declared purposes.

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(Data Controller signature/stamp)