

GENERAL POLICY

PRECONDITIONS

What is this document? This document is the personal data processing policy for data subjects (for example, providers, advisors, guests and visitors) who interact with Melucci S.r.l.

Why this document? National and international legislation on personal data protection require that the data subject is informed on personal data that are processed and on who will process them, in order to guarantee that the processing will be fair and transparent.

Hereinafter we will therefore see clearly listed **who** will process your data, **which** personal data will be processed, **the purposes** for which the personal data will be processed, **for how long** the data will be processed, which are **your rights** and **how to exercise them**.

Which laws are referred to in this document? The policy is offered by taking in conjunction with:

- The General Data Protection Regulation (GDPR) EU n. 2016/679 (hereinafter the "Regulation")
- Italian Legislative Decree n. 196/2003 as amended by the Legislative Decree n. 101/2018 (hereinafter "Code")
- Italian Legislative Decree n. 81/2008 Consolidated Law on health protection and security in working places.

POLICY

1) DATA CONTROLLER

Melucci S.r.l., via Emilia 78-80, 47921 Rimini (RN), Tel. +39 0541 775768, Fax +39 0541 778601, E-mail amministrazione@melucci.it

2) PURPOSES, LEGAL BASIS, STORAGE RETENTION PERIOD AND NATURE OF THE PROCESSING

Personal data, depending on the actions carried out by the data subject, will be processed for the following purposes:

a. Reply to received applications:

- The legal basis of this process is the need to perform pre-contractual measures adopted upon request by the data subject of which is party;
- The data retention period for this purpose is equal to the time necessary to process the request;
- Personal data is essential to execute the request and the eventual rejection will determine the inability to reply to the data subject.

b. Perform contractual activities:

- The legal basis of this process is the need to perform a contract of which the data subject is party;
- The retention period of personal data processed for this aim is all the contract period and, in case of litigation, for the whole duration of it, until all the appeal actions terms will be exhausted;
- Personal data required are necessary to perform the contract and the eventual rejection will determine the inability to perform it.

c. Detection of people present on site for managing the emergency situations:

- The legal basis of this process is the need to fulfil a legal obligation of which the data controller is party relating to fire safety and for managing the emergency in working places, pursuant to the Italian Legislative Decree n. 81 "Consolidated Law on health protection and security in working places";
- The data retention period for this purpose is 24 hours;
- The provision of personal data is mandatory and the eventual rejection will determine the inability to access to headquarters.

d. Send brochures and marketing material (direct marketing):

- The legal basis of this process is the explicit consent of the data subject;
- The data retention period for this purpose is valid until the data subject asks for the unsubscription from the promotional service/sending of newsletters. We remember that the consent could be revoked at any time without that the lawfulness of processing based on consent before its withdrawal is affected;
- The provision of personal data is optional and the eventual rejection will determine the inability to receive brochures and marketing material.

e. Analyze consumption habits and choices (profiling), carry out market research (surveys and analysis of Customer satisfaction):

- The legal basis of this processing is the explicit consent of the data subject;
- The data retention period for this purpose is valid until the data subject does not revoke the consent. We remember that the consent could be revoked at any time without that the lawfulness of processing based on consent before its withdrawal is affected;
- Additional information on the logic applied and on protection provided for the data subject are available by sending a written request to the Data Controller;
- The provision of personal data is optional and the eventual rejection will determine the inability to profile.

f. Administrative and management purposes and for the fulfilment of obligations required by the legislation, by a regulation or by an order of the Authority (for example, bookkeeping, tax formalities, administrative and accounting management, etc.):

- The legal basis arises from the need to fulfil a legal obligation to which is subjected the data controller;
- The data retention period for this purpose is connected to each legal obligation regulated by specific relevant legislation;
- The provision of personal data is optional, because the data controller shall fulfil a legal obligation to which is subjected or to the requests of relevant authorities.

g. Prevent, verify and pursue unlawful conducts:

- the legal basis for this processing is pursuit the legitimate interest of the Data Controller in order to prevent, determine or pursue offences or intellectual property rights breaches (also of third parties) or informatic crimes or made through telematic networks.
- The data retention period for this purpose is equal to the time reasonably necessary to assert the Data Controller's rights from the time you become aware of the offence or of its potential commission.

3) PERSONAL DATA PROCESSED

By processing personal data we mean any operation or a set of operations, performed with or without the aid of automated processes and applied to personal data or a set of personal data, as the recollection, the registration, the organization, the structure, the retention, the trend or change, the exfiltration, the consultation, the use, the communication through the transmission, spread or any other form

available, the comparison or the interconnection, the limitation, the deletion or the disruption. Further processing, categories of particular data by the Data Controller, will be carried out only with prior and explicit consent.

Personal data processed are the following:

- *Data given by the user*: The optional, explicit and voluntary sending of messages to the contact addresses of the Data Controller involve the acquisition of the sender's contact data, necessary to reply, as well as all personal data included in the communications.

4) RECIPIENT OF PERSONAL DATA

Personal data might be shared, for specific purposes, with:

- Subjects acting as "Data Processors", according to the Article n. 28 of the Regulation namely, people, companies or professionals who provide assistance and advisory activities to the Data Controller in connection with the provision of goods/services;
- Subjects with which is necessary to interact for the goods/services provision, as independent Data Controller;
- Subjects, bodies or Authorities whom the communication of data is mandatory by legal provisions or orders from the Authorities;
- Personnel expressed authorized by the Data Controller, necessary to carry out activities strictly related to the provision of goods/services, which are undertaken to confidentiality or are legally bound to do so and that have received opportune operational instructions, pursuant to article 29 of the Regulation.

The full list of Data Processors is available by sending a written request to the Data Controller.

5) TRANSFERS OF PERSONAL DATA

Some of your personal data are shared with recipients who could be out of the European Economic Area (EEA). The Data Controller ensures that the processing of your personal data is carried out according to the Regulation. Verily, transfers shall be based on an adequacy decision or on Standard Contract Clauses approved by the European Commission. Further information is available at the Data Controller.

6) EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS, INCLUDING PROFILING

The Data Controller does not adopt an automated decision-making process on personal data, including the profiling, referred to in Article 22 of the Regulation. Further information will be available at the Data Controller.

7) DATA ABOUT PEOPLE UNDER 18 YEARS OLD

People under 18 years old may not provide personal data. The Data Controller will not be responsible of possible recollection of personal data, as well as false statements, offered by the minor, and in every cases, if it is seen to be used, the Data Controller will facilitate the right to access and the right to erasure forwarder by the guardian, foster or who exercises the parental responsibility.

8) RIGHTS OF DATA SUBJECT

Data subject has the right to obtain from the Data Controller, in certain specific cases, the access to personal data and the rectification or the erasure of the same or the restriction of the processing or to the right to object to the processing (Article 15 and following of the Regulation). The appropriate petition to the Data Controller shall be presented by contacting the email designed for the feedback to the data subject or by filling the form available in the dedicated privacy section.

9) RIGHT TO COMPLAIN

The data subject that believes that the processing of personal data is taking place in breaching of the provisions of the Regulation, shall have the right to lodge a complaint to the Italian Data Protection Authority (www.gdpr.it), as required by the article 77 of the Regulation, or bring the issue before the competent courts (article 79 of the Regulation)

10) HOW TO EXERCISE YOUR RIGHTS

In order to exercise your right, you shall access the Privacy Area of the website www.melucci.it, and use the special form provided. Alternatively, you can contact the data controller in charge of the data subject's response:

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11) CHANGES

The Data Controller reserves the right to amend and/or supplement this Policy at any time and he undertakes to publish the changes on the website www.melucci.it into the Privacy Area. Data subjects are invited to periodically verify the content. This policy is in force since 26/07/2021.