

Information on the processing of personal data

Information pursuant to art. 13 of the European Regulation 679/2016 on the protection of personal data [GDPR]

In accordance with the requirements of the General Data Protection Regulation, the Data Controller Processing provides the data subject with the following information in relation to the processing of personal data carried out.

DATA CONTROLLER	
Titular	M.C.M. S.P.A.
Address	via Castello, 70 - 24060 Adrara San Martino (Bg)
PIVA / CF	P.IVA / C.F. 02266740162
Contacts	PEC: amministrazione.mcm-spa@pec.it Tel +39 035 93 36 85 Fax +39 035 93 34 60
Contacts privacy	Email: privacy@mcm-spa.it
Data Protection Officer	Not present
Joint Data Controllers	<ul style="list-style-type: none"> No joint controllers present
<p><i>If you wish to request further information on the processing of your personal data or to exercise your rights, you can contact us in writing directly at the "Privacy Contacts" address indicated above.</i></p>	

CATEGORIES OF DATA SUBJECTS	
List of categories of data subjects	Clients or Users, Potential Clients, Self-employed, Consultants and freelancers, Taxpayers

PROCESSING CARRIED OUT	
Processing that is essential for the performance of the contract with the customer	
Description	Activities functional to the fulfilment of contractual and pre-contractual obligations, the management and execution of the activities essential to provide the customer with the established service/product and related accounting.

ORIGIN, PURPOSE, LEGAL BASIS AND NATURE OF THE DATA PROCESSED	
Origin	Data collected from the data subject.
Purpose	<ol style="list-style-type: none"> Customer management Litigation management Monitoring of contractual obligations Scheduling of activities

	5. Internal control services 6. Services to protect consumers and users 7. Survey of the degree of customer satisfaction 8. Customer information about new services/products 9. Protection of the property of the customer or employee 10. Accounting or treasury management 11. Services to protect the company's assets
Legal basis	For purposes 1, 2, 3, 4, 7, 8: The processing is necessary for the performance of a contract to which the data subject is a party or for the execution of pre-contractual measures adopted at the request of the data subject For purposes 5, 6, 9, 10, 11: The processing is necessary for compliance with a legal obligation to which the controller is subject
Personal data processed	Economic, commercial, financial and insurance activities, Tax identification number and other personal identification numbers, Bank details, Residential address, E-mail address, Nature of assets, Name, address or other personal identification elements
<p>"Special" data (sensitive data) are those defined by art. 9 and 10 of Regulation 2016/679/EU ("GDPR"). These data are processed in compliance with the provisions of the GDPR as well as in the light of the General Authorizations issued by the Authority for the protection of personal data.</p>	
Special data processed	-
Legal basis Art. 9	

RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA	
Categories of recipients	Your personal data will be communicated on the basis of the legal basis provided for in Article 6 of Regulation 2016/679/EU, to the following third parties:
	Judicial offices, Local authorities, Consultants and freelancers, including in associated form, Companies and businesses, Banks and credit institutions, Social security and welfare institutions, Other public administrations, Professional associations and colleges, Employers, Associations of entrepreneurs and businesses, Trade unions and employers' associations, Joint bodies in the field of labour, Parent companies, Subsidiaries and associated companies, INPS, Ministries (Economy and Finance), INAIL, ASL, Hospitals and Regions, Judicial Authorities, Chambers of Commerce, Industry, Crafts and Agriculture
	These bodies, bodies, companies and professionals act as Data Processors appointed by M.C.M. S.P.A. or they are themselves Data Controllers of the personal data transmitted to them.
<p>Your personal data, or the personal data of third parties in your ownership, may also be communicated to external companies, identified from time to time, to which M.C.M. S.P.A. entrusts the execution of obligations deriving from the assignment received, to which only the data necessary for the activities requested of them will be transmitted. All employees, consultants, temporary workers and/or any other "natural person" who, authorized to process the processing, carry out their activities on the basis of the instructions received from M.C.M. S.P.A., pursuant to Article 29 of the GDPR, are designated as "Data Processors" (hereinafter also referred to as "Data Processors"). M.C.M. S.P.A. to the Persons in Charge or Data Processors, if any, may be appointed. issues adequate operating instructions, with particular reference to the adoption and compliance with security measures, in order to guarantee the confidentiality and security of data. With reference to the aspects of personal data protection, you are invited, pursuant to art. 33 of the GDPR to report to M.C.M. S.P.A. any circumstances or events from which a potential "data breach may arise" in order to allow an immediate assessment and the adoption of any actions aimed at countering such event by sending a communication to M.C.M. S.P.A. to the contact details above. This is without prejudice to the obligation of M.C.M. S.P.A. to communicate the data to Public Authorities upon specific request.</p>	

MOVING ABROAD	
Transfers to foreign countries (non-EU) or to international organisations	<ul style="list-style-type: none"> No transfer to foreign countries, except for the management of the assignment received, or to international organizations
<p>The transfer of your personal data abroad may take place if it is necessary for the management of the assignment received. For the processing of information and data that may be communicated to these subjects, the equivalent levels of protection adopted for the processing of the personal data of their employees will be required. In any case, only the data necessary for the pursuit of the intended purposes will be communicated and the regulatory instruments provided for in Chapter V of the GDPR will be applied.</p>	

METHODS, LOGIC OF PROCESSING AND STORAGE TIMES	
Duration of treatment	The data processing will last for 10 years from the end of the contract.
<p>Your data are collected and recorded lawfully and correctly for the purposes indicated above, in compliance with the principles and prescriptions referred to in art. 5 c 1 GDPR. The processing of personal data is carried out using manual, computer and telematic tools with logics strictly related to the purposes themselves and, in any case, in such a way as to guarantee their security and confidentiality.</p>	

NATURE OF THE PROVISION	
The processing of personal data will be carried out for the following purposes:	
Purposes that <u>do not require</u> consent	<ul style="list-style-type: none"> - Customer management - Litigation management - Monitoring of contractual obligations - Scheduling of activities - Internal control services - Services to protect consumers and users - Survey of the degree of customer satisfaction - Customer information about new services/products - Protection of the property of the customer or employee - Accounting or treasury management - Services to protect the company's assets
Purposes that <u>require</u> consent	<p>-</p> <p>Only with your explicit consent to be expressed at the bottom of this policy, the data, the purposes of which require consent, will be processed. In any case, the provision of data is optional and will not prejudice the contractual relationship in place with the Data Controller</p>
<p>For the data collected and used for needs related to the execution of activities related to the contractual relationship and compliance with the legal obligations indicated does not require your consent. Failure to provide the above personal data will make it impossible to follow up on the relationship in question. Your consent is not required for the data collected and used for the legitimate interest of the Data Controller (letter f, art. 6, of the GDPR). The communication of the above personal data is optional but necessary for the execution of the services offered by the Data Controller. Any refusal to Communicating such data will make it impossible to provide all or part of the services requested.</p>	

DIRITTI DEGLI INTERESSATI
(Artt. da 15 a 22 del GDPR)

Right of Way	The interested party has the right, in accordance with the provisions of art. 15 to 22 of the GDPR to request access to your personal data from the controller.
Right to rectification	The interested party has the right, in accordance with the provisions of art. 15 to 22 of the GDPR to request the controller to rectify their personal data.
Right to erasure	The interested party has the right, in accordance with the provisions of art. 15 to 22 of the GDPR to request the data controller to erase their personal data.
Right to restriction	The interested party has the right, in accordance with the provisions of art. 15 to 22 of the GDPR to request the controller to limit the data concerning him/her.
Right to object	The interested party has the right, in accordance with the provisions of art. 15 to 22 of the GDPR to object to their processing.
Right to data portability	The interested party has the right, in accordance with the provisions of art. 15 to 22 of the GDPR to exercise their right to data portability.
Right of revocation	The interested party has the right, in accordance with the provisions of art. 15 to 22 GDPR to exercise your right to withdraw consent.
Right to lodge a complaint	The interested party has the right, in accordance with the provisions of art. 77 of the GDPR to exercise their right to lodge a complaint with the supervisory authority.

AUTOMATED PROCESS

Is there an automated process?	NO
Automated processes or profiling methods	-
Legal basis	-

The Data Controller reserves the right to make any changes to this information on the processing of personal data deemed appropriate or made mandatory by current regulations, at its sole discretion and at any time. On these occasions, users will be duly informed of the changes that have taken place.

The Data Controller

M.C.M. S.p.A.
In persona dei Suoi Consiglieri Delegati e Legali rappresentanti *pro-tempore*,
Sergio Gafforelli
Lavelli Paolo


