

Mirabello Carrara S.p.A.
Gruppo Caleffi
Via Einstein, 9/11 - 20821 Meda (MB)
Tel. 0039 0362 1980119 - Fax 0039 0362 338024
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INFORMATION NOTICE ON THE PROCESSING AND USE OF PERSONAL DATA

Mirabello Carrara S.p.A. here informs you, with this notice drawn up in accordance with article 13 of EU Regulation no. 679/2016 on personal data protection, (hereinafter also referred to as the "Regulation"), on the processing and use of your personal data in your capacity as customer for the company (where hereinafter also referred to as the "Customer").

1. Controller of the processing of personal data

The Controller of the processing of personal data is Mirabello Carrara S.p.A., with registered office at via Einstein n. 9/11, 20821 Meda (MB), Italy, Tax Code 06399280152, VAT number 02231540960, certified e-mail pec@mirabellocarrara.telecompost.it, tel. +39 0362 1980119, fax +39 0362 338024 (where hereinafter also referred to as the "Data controller" or "Company" or "Mirabello Carrara").

2. Purpose, legal basis of the processing of personal data, nature and consequences derived from failure to provide the data

The Company informs you that in order to establish and to execute the contractual relationship, it will come into possession of personal data of the Customer, where this is an individual person, or of the personal data of the legal representatives, attorneys or employees of the Customer, where it is a legal entity. As regards the latter, the data are provided by the Customer and used by Mirabello Carrara for the sole purpose of engaging in its dealings with the Customer as legal entity, and on the premise the persons concerned have been duly informed on the matter of the transmission of the data of the Customer itself.

The personal data gathered by Mirabello Carrara, including verbally, and which it uses, are the data that have been voluntarily provided at the time of the establishment and execution of the contractual relationship (which, by way only of example, as the case may be, include the name, company name, tax code, VAT number, registered office or name/surname/email address/telephone numbers of the contact person in the company, etc.) as well as those that may be contained in any correspondence sent to the Data controller to report, for example, any problems or to forward any request or comments on Mirabello Carrara and/or its products and/or the contractual relationship ("Personal Data").

Such Personal Data shall be processed, as the case may be, for the following aims:

- (i) **the conclusion, execution and operational management of the contract**, as well as for aims strictly connected, derived from, or pursuant to these;
- (ii) **tax, administrative and accounts purposes**;
- (iii) **any analysis of the credit rating** of the Customer through CERVED or similar data bases;
- (iv) **to respond to any correspondence sent to the Data controller** to report problems and/or to send requests or comments regarding the products.

The provision of Personal Data for the aims set forth in paragraphs 2 (i) and (ii) is necessary for the Company to be able to perform its contractual and/or legal obligations; so, any failure to provide them will result in the impossibility of establishing and/or executing the contractual relationship.

The provision of Personal Data for the aims provided for in paragraph 2 (iii) is necessary to pursue the lawful interest of the Data controller to be able to appraise the economic and financial stability of its Customer. The failure to contribute these data will make it impossible for the Company to carry out the indicated checks and evaluations and hence put the contractual relationship into effect.

The provision of Personal Data for the aims provided for in paragraph 2 (iv) is necessary for the Company to be able to follow up any correspondence and/or requests received; so, any failure to provide these data will result in the impossibility, for the Data controller, to respond to the correspondence and/or requests sent.

It must therefore be emphasised that all processing of Personal Data is carried on the basis of lawful (legally founded) "justifications". In particular, the processing of Personal Data is justified on the basis of the following premises:

- such processing is necessary for the performance of an agreement or contract with the Customer or to follow up on the activities requested by the Customer;
- such processing of the data represents the lawful interest of the Data controller.

3. Manner of processing of the data and the term for their storage

The processing of Personal Data is carried out by the means indicated in article 4 no.2 of the Regulation, and specifically: the collection, recording, organisation, conservation, consultation, processing, modification, selection, extraction, comparison, use, interlinking, blocking, communication, cancellation and destruction of the data.

The Personal Data shall be processed using information technology, digital, and/or hard copy paper means, only for the aims set forth above and in such a way as to ensure their security and confidentiality and to prevent their loss, unlawful or improper use, and unauthorised access.

The Personal Data shall be processed:

- (i) with reference to paragraphs 2 (i) and (ii), for the time necessary for the performance of the contractual relationship and for the performance of the obligations in law and the administrative-accounting requirements of the Data controller for a maximum term of 10 years from the cessation of the contractual relationship;
- (ii) with reference to paragraph 2 (iii) for the time necessary to obtain the required credit information;
- (iii) with reference to paragraph 2 (iv), for the time strictly necessary to respond to the requests and/or correspondence sent.

In any case the statute of limitations applies to the rights and obligations relating to the processing of data.

The Personal Data shall in any case be processed by the personnel of the Data controller duly charged with such tasks and trained by the Data controller itself.

4. Recipients of the personal data

The Personal Data may be communicated to, strictly in relation to, and where compatible with the aims set forth above, to the following categories of recipients:

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- third parties for any outsourced activities carried out for the Data controller, including, in particular, agency and transport/shipping/logistics services;
- banks, credit institutions;
- the supervisory authorities.

Persons belonging to the above-indicated categories will operate fully independently, as autonomous data controllers, or as responsible persons acting on behalf of the Data controller. The list of the responsible persons may be requested on writing to the following email address: privacy@mirabellocarrara.it

5. Transfer of personal data to a third-party country or an international organisation

The Data controller does not intend to disclose the Personal Data to countries that are not in the European Union.

It is in case understood that the Data controller - if it should become necessary (essentially given the location of the third parties' servers that carry out, for the Data controller, outsourcing services as in paragraph 4 of this information notice) - shall have the right to transfer the Personal Data also outside the EU. In this case, the Data controller makes the assurance, as of now, that the communication of data will take place in compliance with applicable law, following adoption of the standard contractual clauses taken up by the European Commission.

6. Rights of the Data Subject

The Data Subject may at any time exercise the following rights with regard to the Controller:

Right of access: (art. 15 of the Regulation)	to obtain confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information related to the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed..
Right to rectification: (art. 16 of Regulation)	(i) to obtain without undue delay the rectification of inaccurate personal data concerning him or her and (ii) to have incomplete personal data completed.
Right to erasure (“right to be forgotten”): (art. 17 of the Regulation)	to obtain the erasure of personal data concerning him or her without undue delay (the controller shall have the obligation to erase personal data without undue delay in the cases as per article 17 of the Regulation).
Right to restriction of processing: (art. 18 of the Regulation)	to obtain restriction of processing in the cases as per article 18 of the Regulation.
Right to data portability: (art. 20 of the Regulation)	to receive the personal data concerning him or her, which is in our possession, in a structured, commonly used and machine-readable format; the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, in the in the cases as per article 20 of the Regulation.
Right to object to the processing performed based on point (e) or (f) of Article 6(1): (art. 21 of the Regulation)	to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. and (ii) where personal data are processed for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing.

The complete text of the articles of Regulation UE 679/2016 governing the rights of the Data Subject is available at the following website www.mirabellocarrara.it

To submit requests in relation to the exercise of your rights as listed above, as Data Subject you may contact the Data controller (using, eventually, the form available at the Data controller's registered office or at the following website www.mirabellocarrara.it) sending own requests by registered post with return receipt requested to the Data controller's registered office or at the e-mail address privacy@mirabellocarrara.it.

It is lastly pointed out that the Data Subject has the right to lodge a complaint with the Data Protection Supervisor if it considers that the processing of personal data relating to him or her infringes Regulation (EU) 679/2016.