

GENERAL PRIVACY POLICY

1. DATA CONTROLLER

MiTI SpA (Tax Code: 06411360966), with registered office located at MILAN – CORSO ITALIA N. 22, e-mail: it@mitigd.com, in its capacity as Data Controller (hereinafter the "Controller"), hereby provides this privacy policy pursuant to Articles 13 and 14 of EU Regulation 2016/679 (hereinafter "GDPR").

The Data Controller has appointed a DPO who can be contacted at dpo@scuadra.it.

2. COLLECTED DATA, PURPOSE OF PROCESSING, CONSEQUENCES OF FAILURE TO RETURN THE DATA AND NATURE OF DATA PROVISION

PURPOSE	DATA PROCESSED	LEGAL BASIS	NATURE OF DATA PROVISION	STORAGE PERIOD
A. Management of relations and contracts with customer and relevant procedures	- Individual customers: personal information, contact details, residence details; - Customers' collaborators/emplo yees: personal details, contact	- Performance of a contract to which the data subject is a party or performance of pre-contractual measures taken following a request of the data subject - Compliance with a legal obligation to which the data controller is subject	Mandatory: the provision is necessary for the management of the relationship/contract with suppliers/custome rs	Without prejudice to legal obligations, personal data will be processed for the period required to achieve the purposes for which such data are collected and, in any case, for the entire duration of the contract/relationshi p/contact with the data subject and no longer than 10 years as of the termination thereof. However, the Data Controller may continue to store such data for a
B. Management of purchases of goods and services and related practices; management of relations with supplier	details Suppliers' collaborators/emplo yees: personal information, contact details; - Individual suppliers: personal information, contact details, residence details.			
C. Company's accounting management	Individual customers, individual suppliers: personal details, bank details			longer period in order to manage any dispute relating to the relevant established relationship.
D. Newsletter subscription form	Website users: contact details	Express consent. For individuals who are already customers, the company may send commercial communications — exclusively via email — without being required,	Optional	Until the user opts out.





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		pursuant to Article 130, paragraph 4 of the Privacy Code, to obtain prior consent. It will still be possible to opt out.		
E. Contract Form	Website users: contact and identification details	Performance of a contract	Optional	5 years
F. Cookies and website tracking tools	Website users: IP or other data collected by the activated cookie	Express consent	Optional	For further information, please refer to the cookie policy available on the website.
G. Whistleblowing	- Reporting individuals and persons mentioned in the report: personal data and special categories of personal data	- Compliance with a legal obligation	The provision of data is optional. However, the report must be complete in order to be correctly processed.	See the specific privacy policy published on the website.

3. PROCESSING METHODS

The collected data are processed using paper and electronic means.

The Data Controller processes the Users' Personal Data in accordance with Legislative Decree No. 196/2003 and the GDPR, adopting appropriate security measures to prevent unauthorised access, disclosure, modification or loss of Personal Data.

The collected data (limited to personal data) may be communicated to countries outside the EU for the purposes indicated above: in such case, the Data Controller undertakes to guarantee adequate levels of protection and safeguarding in accordance with the applicable regulations.

4. PERSONS INVOLVED IN THE PROCESSING

The collected data are processed by persons designated as data processors or persons in charge of processing, in accordance with Articles 29 and 30 of Legislative Decree No. 196/2003 and Articles 28 and 29 of the GDPR.

The collected data may be processed, exclusively for the indicated purposes, by personnel of the data controller or by third parties, such as:

- companies that provide IT system maintenance services;
- associations, consultants, professional firms, companies that provide assistance and advice to the Data Controller;
- customers and/or suppliers with whom the data subject interacts in the course and for the performance of the relevant tasks (limited to non-sensitive personal data);
- social security, welfare and insurance institutions, the financial administration, other authorised public entities, within the limits provided under legislative, regulatory and contractual provisions.

5. RIGHTS OF THE DATA SUBJECT

You are entitled to exercise your rights as set forth under Articles 15 to Article 21 of the GDPR, and, as a result:

in addition to the data portability right, to obtain access to your personal data and to rectify or the erase such data, as well as to obtain the restriction of the processing concerning you or to oppose to the processing of said data;





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- to withdraw consent, where processing is based on Article 6(1)(a), at any time and without prejudice to the lawfulness of the processing based on consent given prior to the withdrawal;
- to lodge a complaint with a supervisory authority.

For the purpose of exercising your rights, please send your requests to the email address by filling-in the form for exercising the rights of data subjects available on the website.







