

**INTRODUCTION**

With EU Regulation 679/2016, containing regulations to protect natural persons with respect to the processing of personal data, MECAL Srl with office in Via Torre Beretti 27030 Frascarolo (PV), Italy (hereinafter defined “organisation”) in its capacity as Data Controller, represented by Rosella Meschini, is obliged to provide some information concerning the use of personal data.

**SOURCE OF DATA AND TYPE OF DATA PROCESSED**



The personal data acquired by the organisation can be collected:

- directly from the data subject
- from publicly accessible sources (e.g. documents published by chamber of commerce, etc.)
- from third parties should the organisation acquire data for the purpose of sending commercial information, carrying out market research or offering products and/or services

For the data not collected directly from the data subject, this information is provided upon their recording and in any case not after any initial occasion on which they are communicated.

The data processed, where the relationship existing requires it, is: personal data.

In any case, all this data is processed in compliance with the law cited and the confidentiality obligations which have always inspired the activity

**PERIOD OF DATA RETENTION**



The data is retained solely for the period necessary for the purposes for which it is processed or within the terms envisaged by national and EU laws, rules, and regulations which the organisation must observe (e.g. accounting and tax regulations, etc.). A periodic annual check is envisaged on the data processed and the possibility of deleting it if no longer necessary for the envisaged purposes.

of the organisation.

	<b>DATA PROVISION AND CONSEQUENCES OF FAILURE TO PROVIDE</b>	<b>MANDATORY/NOT MANDATORY</b>
	The provision of data must be considered mandatory with respect to the processing that the organisation must carry out to fulfil its obligations towards the data subject on the basis of the existing relationship (or contract) as well as obligations relating to law, rules and regulations. Failure to provide such data may make it impossible for the organisation to proceed with the existing relationship.	The purposes for which the provision of data is mandatory are marked with the following symbol:
	Consent is not mandatory for any other purposes and, even if provided, may be withdrawn at any time by the data subject.	The purposes for which the provision of data is NOT mandatory are marked with the following symbol:

**PURPOSES OF DATA PROCESSING**



The data is processed as part of the routine activity of the organisation and in accordance with the following purposes. Should the controller intend to process the data further for a purpose other than that for which it was collected, they will provide the data subject in advance with all necessary information and will request consent where required.

- Provision of services and/or supply of products requested by the data subject as part of the existing relationship (or contract), including the related purposes of legitimate interest, that is, the administrative (e.g. invoicing), accounting and tax and commercial statistics obligations, as well as the implementation and management of the obligations envisaged by national and EU laws, regulations and rules, as well as orders issued by authorities sanctioned by law and by supervisory and monitoring bodies
- Market research, marketing activity, sending of material containing commercial information on products/services already purchased or offered again, in any way and carried out by any means, including through automated methods (e.g. e-mail, newsletters, fax, telephone, post, social networking sites, etc.)
- Determination of the degree of satisfaction of the data subject with the quality of the products/services or of the activities of the organisation, carried out directly or through specialist companies through personal or phone interviews, questionnaires, etc.
- Mention of the name and use of the logo of the client and of the description of activity carried out by way of reference, through communications made through text/photo/audio/video material via internet, mailing list, web and social media (e.g. Facebook, LinkedIn, Twitter, YouTube, Google+, etc.), traditional media or on brochures, catalogues and documents on the offering for new potential clients or clients already acquired

**LEGAL BASIS OF DATA PROCESSING**



The data is processed for the purposes stated above, as well as on the basis of consent (purposes 2, 3, 4), also for the purposes of complying with a contractual/pre-contractual (purpose 1), legal, or regulatory obligation, as well as orders issued by sanctioned authorities and by supervisory and monitoring bodies. The explicit legal references updated to their latest state of revision which envisage the obligations or duties on the basis of which data processing may be carried out are available and can be consulted by addressing the Data Controller and in any case are part of the existing legislation of the European Union as well as of the Member State to which the data controller is subject.

**DATA PROCESSING METHODS**



The processing of personal data takes place through manual, computerised and remote tools, with a logic strictly linked to the purposes themselves and in any case in such a way as to guarantee the security and confidentiality of the data itself. The documentation is archived both electronically and on paper. Some essential information follows.



Personal data collection is limited to the minimum necessary for each specific purpose of processing.



Personal data processing is limited to the purposes for which it was collected.



Personal data storage is limited to the minimum necessary for every specific purpose of processing.



Personal data is not provided to third parties for marketing



Personal data is not sold or hired out.

**DISTRIBUTION AREA AND CATEGORIES OF PARTIES TO WHOM THE DATA MAY BE COMMUNICATED**



The personal data collected by the organisation may be communicated, within the limits strictly relevant to the purposes indicated above, also to the following parties or categories of parties. For all the purposes indicated above, communication of the data also derives from a legal or contractual obligation or is a necessary requisite for entering into a contract. In the absence of the above communications, the relationship/contract may not be fully implemented. The data may also be communicated, to the subjects marked below with the \* symbol for purpose no. 1, in countries outside the EU (country of the client or where companies in the Mecal network are found for the purposes of providing the service or selling the product required by the client). In the case of data transfer abroad, the organisation will evaluate the adequacy of the country or the existence of corresponding requisites.

- ✔ Parties to whom communication is envisaged by law, by regulation or by the national and EU legislation as well as for the performance of contractual or pre-contractual obligations\*
- ✔ Banks, Insurance Companies and similar bodies for the performance of contractual or pre-contractual obligations\*
- ✔ Companies that study the quality of services provided, societies that perform activities of transmitting, enveloping, transporting and sorting communications to the data subjects
- ✔ Legal and accounting consultants for the purposes of studying and resolving any legal issues concerning the existing contractual position
- ✔ Consultants and professionals (technicians, designers, etc.) or companies that collaborate with the organisation for the purposes of providing the service requested or selling the product purchased (e.g. carriers, international partners, etc.)\*
- ✔ Associated companies for purposes connected with relationships existing with the organisation and for the purposes envisaged by contracts\*
- ✔ Public administrations and bodies responsible for workplace security and safety
- ✔ External firms specialising in the management of aspects of an accounting and tax nature (e.g. accountants, auditing firms, etc.)
- ✔ To all parties that may be recipients of the organisation's communication campaigns (only for purpose no. 4)

**RIGHTS OF THE DATA SUBJECT**



The data subject may exercise their rights towards the Data Controller or Data Processor at any time, in accordance with EU Regulation 679/2016 by contacting Rosella Meschini using the following details: mecal@mecal.com – tel +39- 038484671 – fax +39- 0384849002 – MECAL Srl Via Torre Beretti 27030 Frascarolo (PV), Italy (for written communications). To guarantee the correct exercise of rights, the data subject must make themselves unambiguously identifiable. The organisation undertakes to respond within 30 days and, in the event that observing this time frame is impossible, to justify any extension to the envisaged terms. The response will be free of charge except in the case of invalidity (e.g. there is no data on the data subject making the request) or excessive requests (e.g. temporally repetitive) for which a charge for expenses may be made no greater than the costs effectively borne for the research carried out in the specific case. The rights with reference to the personal data concerning deceased persons may be exercised by those who have a personal interest or act to protect the data subject or for family reasons deserving protection. The data subject may also lodge a complaint with the supervisory authority.

In the case of violation of personal data suffered by the organisation, the controller will proceed to inform the competent advisory authority within 72 hours of the incident and will also advise the data subject of the event, except in cases of exclusion envisaged by the regulations. **THE DATA SUBJECT HAS THE RIGHT TO REQUEST:** Access to, rectification of, deletion of personal data, limitation of processing, as well as data portability.

**THE DATA SUBJECT HAS THE RIGHT TO OBJECT:** To the processing and withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent expressed before withdrawal.

**RIGHT TO OBTAIN INDICATION OF**

- origin of personal data
- categories of data processed
- purposes and methods of processing
- period of retention
- logic applied in the case of processing with the aid of electronic tools
- identifying details of the Data Controller and Processor
- parties and categories of parties to whom the personal data may be communicated or who may become aware of it in their capacity as data processors or data processing staff also in countries outside the European Union
- existence of the profiling process

**RIGHT TO OBTAIN**

- confirmation of the existence or otherwise of their personal data and that such data is made available in an intelligible form
- updating, rectification, completion of data and limitation
- deletion (right to be forgotten), anonymisation or blocking of data processed unlawfully (including that for which retention is not necessary in relation to the purposes for which it was collected or subsequently processed)
- confirmation that the operations in the point above have been brought to the attention also of those to whom the data was communicated or distributed, except in the event that this action proves impossible or requires the use of means clearly disproportionate to the right protected by the organisation
- data portability (direct transmission from one controller to another)
- copy of the data processed

**RIGHT TO OBJECT**

- to processing of the personal data concerning the data subject including profiling for legitimate reasons, even if relevant to the purpose of collection
- to the processing of personal data that concerns the data subject for the purposes of: sending advertising material, direct sales, performance of market research, commercial communications.
- to the processing of data processed for the purposes of scientific or historic research or for statistical purposes except in the case of public interest in processing

COMPANY NAME/ ..... ADDRESS .....  
FORENAME(S) AND .....  
SURNAME .....

Whereas, as defined in the information that the client organisation/the undersigned expressly declares that they have received and read, the continuance of the existing relationship/contract with MECAL srl may involve the necessity of processing data (also of natural persons linked to the client organisation) and aware that in the absence of the provision of such data (and in the absence of the related communications) the relationship/contract may not be fully implemented, the client organisation/the undersigned freely expresses their consent in the manner indicated below.

PURPOSE FOR WHICH CONSENT IS REQUESTED	I CONSENT	I DO NOT CONSENT
 Provision of services and/or supply of products requested by the data subject as part of the existing relationship (or contract), including the related purposes of legitimate interest, that is, the administrative (e.g. invoicing), accounting and tax and commercial statistics obligations, as well as the implementation and management of the obligations envisaged by national and EU laws, regulations and rules, as well as orders issued by authorities sanctioned by law and by supervisory and monitoring bodies which may also involve communication of the data to the parties (possibly also abroad) indicated in the information	<input type="checkbox"/>	<input type="checkbox"/>
 Market research, marketing activity, sending of material containing commercial information on products/services already purchased or offered again, in any way and carried out by any means, including through automated methods (e.g. e-mail, newsletters, fax, telephone, post, social networking sites, etc.)	<input type="checkbox"/>	<input type="checkbox"/>
 Determination of the degree of satisfaction of the data subject with the quality of the products/services or of the activities of the organisation, carried out directly or through specialist companies through personal or phone interviews, questionnaires, etc.	<input type="checkbox"/>	<input type="checkbox"/>
 Mention of the name and use of the logo of the client and of the description of activity carried out by way of reference, through communications made through text/photo/audio/video material via internet, mailing list, web and social media (e.g. Facebook, LinkedIn, Twitter, YouTube, Google+, etc.), traditional media or on brochures, catalogues and documents on the offering for new potential clients or clients already acquired	<input type="checkbox"/>	<input type="checkbox"/>

SIGNATURE ..... DATE .....