

SUBJECT: INFORMATION TO CUSTOMERS/SUPPLIERS pursuant to and for the purposes of EU GDPR 2016/679 concerning the protection of personal data processing.

The undersigned company **MM CONSTRUCTION SRL** (hereinafter, "Data Controller"), as data controller, hereby informs you, pursuant to Art. 13 EU Regulation no. 2016/679 (hereinafter, "**GDPR**"), that your data will be processed in the following ways and for the following purposes:

Purpose of processing.

Personal data are collected and processed:

1. to define contracts for the services/products offered/requested;
2. to fulfil pre-contractual, contractual and tax obligations arising from existing relations with you;
3. to exercise the holder's rights, such as the right of defence in court;
4. to manage the possible presence at our premises in order to comply with workplace safety and other related regulations;
5. to manage the access video surveillance system for the sole purpose of ensuring the safety of those present within the working environment of the premises and the protection of company assets

and will be processed in accordance with the principles of fairness, lawfulness, transparency and protection of your confidentiality and your rights.

Your personal data will be processed for the duration of the business relationship and also thereafter for the fulfilment of all legal obligations.

Treatment modes

The processing of data for the purposes set out above takes place using both automated methods, on electronic or magnetic media, and non-automated methods, on paper, in compliance with the rules of confidentiality and security laid down by law, the ensuing regulations and internal provisions.

Place of processing

The data are currently processed and stored at the operational headquarters. They are also processed, on behalf of the undersigned, by professionals and/or companies appointed to carry out technical, development, management and administrative-accounting activities.

Compulsory or optional nature of providing data and consequences of refusal to provide data

The provision of data is compulsory for all that is required by legal and contractual obligations, and therefore any refusal to provide such data in whole or in part may make it impossible for the undersigned to execute the contract or to properly perform all the obligations connected with the employment relationship.

Data Communication

In the handling of your data, the following categories may become aware of your data:

- employees and collaborators of the Controller, in their capacity as persons in charge and/or internal data processors and/or system administrators;
- third-party companies or other entities performing outsourcing activities on behalf of the Controller;
Without the need for your express consent, art. 6 letters b) and c) GDPR), the Data Controller may communicate your data to Supervisory Bodies, Judicial Authorities, as well as to those subjects to whom communication is compulsory by law for the fulfilment of the aforementioned purposes. These subjects will process the data in their capacity as autonomous data controllers;
- Professionals or support companies manage any presence at our premises in order to comply with workplace safety and other related regulations
- Professionals or companies supporting the management of the video surveillance system

Data transfer abroad

In order to fulfil pre-contractual, contractual and fiscal obligations deriving from existing relations with you, some of your personal data may be communicated to subjects (customers and suppliers in order to fulfil contractual obligations) in EU Third Countries. Should it become necessary, the writer will be entitled to move the data to servers in EU Third Countries.

Data retention periods

The data provided will be stored in our archives according to the following parameters:

- to define contracts for the services/products offered/requested, to fulfil pre-contractual, contractual and fiscal obligations arising from existing relations with you and to exercise the rights of the Controller, such as the right of defence in court:

for administration, accounting, contractual and labour law activities, management of any litigation: 10 years as established by law in Article 2220 of the Civil Code, without prejudice to any late payment of fees justifying the extension.

- to manage the access video surveillance system for the sole purpose of ensuring the safety of those present within the working environment of the premises and the protection of company assets: 48 hours

Rights of the data subject

You may exercise your rights in relation to such personal data:

- Right of access (Art. 15): The data subject has the right to obtain from the data controller confirmation as to whether or not personal data concerning him or her are being processed and, if so, to obtain access to the personal data
- Right of rectification (Art. 16): The data subject shall have the right to obtain from the controller the rectification of inaccurate personal data concerning him/her without undue delay. Taking into account the purposes of the processing, the data subject has the right to obtain the integration of incomplete personal data, also by providing a supplementary declaration.
- Right to Erasure (Right to be forgotten) (Art. 17): The data subject shall have the right to obtain from the controller the erasure of personal data concerning him/her without undue delay and the controller shall be obliged to erase the personal data without undue delay if one of the following grounds exists:
 - Personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - The data subject shall withdraw the consent on which the processing is based in accordance with Article 6(1)(a) or Article 9(2)(a) and if there is no other legal basis for the processing;
 - The data subject objects to the processing pursuant to Article 21 (Right to object), paragraph 1, and there is no overriding legitimate ground for processing, or objects to the processing pursuant to Article 21, paragraph 2;
 - Personal data have been unlawfully processed;
 - Personal data must be deleted in order to comply with a legal obligation under Union or Member State law to which the data controller is subject.
- the right to lodge a complaint with the Guarantor for the protection of Personal Data at garante@gpdp.it or at the PEC address: protocollo@pec.gpdp.it

Methods of exercising rights

You may exercise your rights at any time by sending:

- a registered letter with return receipt to **MM CONSTRUCTION SRL** - Registered and operational office at **via Sprina, 6 Savigliano (CN) cap 12038 - Italy**
- a PEC to mmconstruction@pec.it

Owner, manager and appointees

The data controller is **MM CONSTRUCTION SRL**, P.IVA e C.F. 03831450048 with registered office in via Sprina 6 Savigliano CN cap 12038