

## INFORMATION ON THE PROCESSING OF PERSONAL DATA EX ARTT 13/14 REG UE 2016/679 MIGLIORA SRL

### **DATA SUBJECTS: USERS RESERVED AREA.**

**Migliora S.r.l.** as the owner of the processing of your personal data - in accordance with EU Reg. 2016/679 (commonly called "GDPR") - hereby informs you that the legislation in question provides for the protection of data subjects with respect to the processing of personal data and that such treatment will be based on the fundamental principles of fairness, lawfulness, transparency and protection of your privacy and your rights. Your personal data will therefore be processed in accordance with the legal provisions of the aforementioned legislation and the confidentiality obligations provided therein.

**PURPOSE AND LEGAL BASIS:** Your personal data will therefore be processed in accordance with the legislative provisions of the aforementioned legislation and the confidentiality obligations provided therein.

In particular, your data will be processed for the following purposes connected with the implementation of **fulfilments relating to legislative, contractual or pre-contractual obligations**: a) fulfilment of legal obligations relating to anti-money laundering regulations (Law no. 197 of 5 July 1991 and subsequent amendments; Legislative Decree no. 20 February 2004 no. 56; Law no. 29 of 25 January 2006; Ministerial Decree of 3 February 2006, no. 141, 142 and 143; UIC (Italian Foreign Exchange Office) Order of 24 February 2006); b) accounting or treasury management; c) management of litigation; d) obligations under applicable laws; d) after-sales service; e) management of relations during purchase transactions; f) management of relations during sales transactions g) customer management; h) quality management; i) planning of activities; f) customer satisfaction surveys; j) services for the protection of consumers and users; k) customer invoicing history; l) supply order history; m) electronic payment instruments.

Your personal data may also, with your consent, be used for the following purposes: **sending via sms and / or e-mail information and promotional communications, as well as newsletters from Migliora S.r.l. in relation to its initiatives, offers and products.**

The provision of data is optional for you with regard to the above-mentioned purposes, and any refusal to treatment does not compromise the continuation of the relationship or the adequacy of the treatment itself.

**METHODS OF PROCESSING:** your personal data may be processed in the following ways: with electronic calculators using software systems managed or programmed directly or by third parties; entrusted to third parties for processing operations; with electronic calculators; with paper archives; data collection in public places or open to the public; data collection by computer or telematic means; data collection through forms, coupons and questionnaires; processing of data collected by third parties.

All processing is carried out in compliance with the methods set out in Articles 6 and 32 of EU Reg. 2016/679 and through the adoption of appropriate security measures.

**PERSONS IN CHARGE OF PROCESSING:** your data will be processed only by personnel expressly authorised by the Data Controller and, in particular, by the following categories of employees: administrative; commercial; programmers and analysts.

**COMMUNICATION OF THE DATA:** your data may be communicated to external subjects for the proper management of the relationship and, in particular, to the following categories of recipients including all duly appointed data processors: subjects necessary for the provision of services offered such as, by way of example, the sending of e-mails and communications; banks and credit institutions; legal communication

relating to anti-money laundering regulations (Law no. 197 of 5 July 1991 and subsequent amendments; Legislative Decree no. 56 of 20 February 2004; Law no. 25

January 2006, no. 29; Ministerial Decree no. 141, 142 and 143 of 3 February 2006; UIC (Ufficio Italiano Cambi) Order of 24 February 2006); consultants and freelance professionals, also in associated form; within public and/or private parties for whom the communication of data is obligatory or necessary to fulfil legal obligations or is in any case functional to the administration of the relationship.

**DATA DISCLOSURE:** Your personal data will not be disclosed.

**TRANSFER OF THE DATA:** your personal data may be transferred, limited to the above-mentioned purposes, to the following States: Countries belonging to the European Union; safe countries outside the European Union; United States of America.

**DATA STORAGE PERIOD:** in compliance with the principles of lawfulness, purpose limitation and data minimisation, pursuant to Art. 5 EU Reg. 2016/679, the storage period of your personal data is established for a period of time not exceeding: the performance of the services provided; the achievement of the purposes for which they are collected and processed for the execution and fulfilment of contractual purposes; the fulfilment of the purposes for which they are collected and processed and in compliance with the mandatory time limits prescribed by law.

**DATA CONTROLLER:** **Migliora S.r.l. (P.IVA 09193300960) with registered office in Viale di Porta Vercellina n.9, 20123 - Milan (MI), in the person of its l.r.l. (info@miglioradv.it).**

**RIGHTS OF THE DATA SUBJECT:** The data subject has the right to obtain from the data controller the erasure (right to be forgotten), restriction, updating, rectification, portability, objection to the processing of personal data and to exercise all the rights pursuant to Articles 15, 16, 17, 18, 19, 20, 21, 22 EU Reg. 2016/679.

The data subject has the right to obtain confirmation of the existence or not of personal data concerning him/her, even if not yet recorded, their communication in intelligible form and the possibility to lodge a complaint with the Supervisory Authority.

Specifically, the data subject has the right to obtain information on: the origin of the personal data; the purposes and methods of processing; the logic applied in the event of processing carried out with the aid of electronic instruments; the identification details of the data controller, data processors and the designated representative ex Art. 5.2. EU Reg. 2016/679; of the entities or categories of entity to whom or which the personal data may be communicated or who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.

Furthermore, the data subject has the right to obtain the updating, rectification or, when interested, the integration of data; the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed certification to the effect that the operations as per the preceding points have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected; portability of the data.

Finally, the data subject has the right to object, in whole or in part: on legitimate grounds, to the processing of personal data concerning him/her, even if pertinent to the purpose of collection; to the processing of personal data concerning him/her for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication.