

**PERSONAL DATA PROCESSING ACCORDING TO
EU REGULATION (GDPR) 2016/679 OF 27/04/2016**

Data controller. The Data Controller is **N.M.B. ITALIA S.r.l.** with registered office at Via A. Grandi, 39/41-20017 Mazzo di Rho (Mi) - tel. 02-939711 - e-mail info@nmbitalia.it

Categories of data subjects and personal data processed. The personal data processed are:

- (i) customers and potential customers natural persons;
- (ii) natural persons acting in the name and/or on behalf of customers and potential business customers (hereinafter, “**data subject**”).

Depending on the data subjects, the processings may concern the following common personal data: personal data, contact data, bank details and data necessary for the execution of the contractual relationship (hereinafter “**Personal Data**”).

Purposes of the Processing and Legal Basis. The Controller processes the Personal Data for the purposes and on the legal basis indicated in the following table

| PURPOSES of the processing | LEGAL BASIS |
|--|---|
| performance of the contract or in order to take steps at the request of the data subject prior to entering into a contract; | processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract |
| Sending to Customers commercial news and/or advertising material by email, post, newsletters referred to products/services provided by the controller; | Pursuit of the legitimate interest of the Controller |
| fulfillment of a legal obligation | Processing is necessary for compliance with a legal obligation to which the controller is subject |
| To assert and defend its rights, also through extrajudicial initiatives and also through third parties | processing is necessary for the purposes of the legitimate interests pursued by the controller |

Nature of data provision. The release of Personal Data is necessary for the pursuit of the aforementioned purposes. The user is free to provide his/her personal data. Failure to provide them, even in part, may prevent the Controller from carrying out the User's request and communication activities, as well as from fulfilling any related obligations.

Personal data storage periods. The Personal Data will be kept by the Controller for the time strictly necessary for the purpose for which they were collected. Personal Data whose processing is necessary in connection with legal obligations, for the period required by law. To assert and defend its right for a maximum period equal to the limitation period for the relevant actions, plus a prudential period of six months, in order to ensure the Company's right of defence in respect of possible future litigation before a court or administrative authority.

Recipients/categories of recipients of personal data. For the purposes set out in this policy Users' Personal Data may be communicated to those authorised to process data by the Controller (employees or collaborators). Furthermore, Data processor may communicate them:

- to persons who can access the data by virtue of legal provisions or secondary or Community legislation;
- to State Administrations, judicial or administrative authorities, public and private bodies, also following inspections and audits;
- to third-party service providers of the Controller (including IT service providers, hosting providers, web editors, as well as companies or entities providing legal or insurance services) who will act, where appropriate, as data processors;
- to banking institutions, for the management of receipts and payments.

For an updated list of recipients, Users may contact the Controller.

Processing methods. The Personal Data will be processed by means of both manual and automated means exclusively by authorised and specially trained persons. All the means used for the treatment are suitable to guarantee the security and confidentiality of the Personal Data.

Transfer of personal data to a third country or international organisation. As a rule, Personal Data is not transferred to Third Countries. If for the fulfillment of the aforementioned purposes this should become necessary, the transfer of Personal Data will take place in compliance with the provisions of the law in force and in the presence of adequate guarantees.

Rights. Data subject may exercise the following rights vis-à-vis the Controller if the circumstances apply:

- **Right of access:** allows Users to obtain from the Controller confirmation as to whether or not Personal Data concerning them are being processed and, where that is the case, to obtain access to their Personal Data;
- **Right of rectification:** allows Users to obtain rectification/addition of inaccurate/incomplete Personal Data;
- **Right to erasure:** allows Users to obtain, in the cases provided for by the regulation, the erasure of their personal data;
- **Right to restriction of processing:** allows Users to obtain, in the cases provided for in Article 18(1) of the GDPR, the restriction (i.e., the marking of personal data stored with the aim of restricting its processing in the future) of the processing of their personal data;
- **Right to data portability:** allows Users - in cases where processing is carried out by automated means on the legal basis of contract or consent - to receive in a structured, commonly used and machine-readable format, limited to the data provided to the Controller, the personal data concerning him/her and similarly the right to transmit such data to another data controller.

In addition, Users have the right: **to object** to the processing of their Personal Data; **to lodge a complaint pursuant to** art. 77 of the GDPR, to the national supervisory authority of the member state of the European Union in which the Data Subject has his/her habitual residence or place of work or where the alleged breach of his/her right occurred (if this state is Italy, the person to whom he/she may refer is the Supervisory Authority for the protection of personal data)

Contact. In order to exercise all rights, the data subject may submit an appropriate request by contacting the Controller in the following ways:

- By E-Mail: info@nmbitalia.it
- By Mail: Via A. Grandi, 39/41- 20017 Mazzo di Rho (Mi)