

Privacy Policy

Pursuant to art. 13 of European Regulation 679/2016 concerning the protection of personal data and the free movement of such data (hereinafter the "Regulation" or "GDPR"), it is hereby informed that the Controller of the data communicated by the user or otherwise obtained as a result of the use of the website with the URL www.groupmcm.com is "M.C.M. S.r.l." (hereinafter the "Company" or the "Controller"), with registered office at Via Provinciale - C.da Castagnara snc, 89022 Cittanova (RC), Italy.

This Privacy Policy is provided pursuant to art. 13 of the applicable legislation to anyone who interacts with the website and complies with Recommendation no. 2/2001 regarding the minimum requirements for online data collection in the European Union, adopted on 17 May 2001 by the Article 29 Working Party. Please note that the processing of your personal data will be based on the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimization, accuracy, integrity, and confidentiality. Consequently, your personal data will be processed in accordance with the legislative provisions of the applicable regulations and the confidentiality obligations therein.

Types of Data Processed

Browsing data

The information systems and software procedures used to operate this Site acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols or is used to improve the quality of the service offered. This information is not collected to be associated with identified data subjects, but by its very nature could, through processing and association, allow users to be identified.

This category of data includes IP addresses or domain names of the computers used by users who connect to the Site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response provided by the server (successful, error, etc.), and other parameters regarding the user's operating system and computing environment.

This data is used to obtain anonymous statistical information on the use of the Site and to check the correct functioning of the information systems. Such data could also be used to ascertain responsibility in the event of hypothetical computer crimes or if damage occurs to the Company or third parties.

Data voluntarily provided by the user

Users are not required to provide personal data to visit the Site. However, any contacts between users and the Company—such as authentication to Site services, filling out contact forms, sending emails, messages, or any type of communication to the addresses indicated on the Site—imply the subsequent acquisition of common personal data, such as first name, last name, address, and telephone number, as well as any other personal data the user may voluntarily provide when interacting with the Company via the Site. Specific notices will be provided or displayed on the pages of the Site that are set up for services.

Purposes and Legal Basis of Processing

Personal data may be collected and processed for the following purposes:

- a) for registration and access to the reserved areas of the Site for the provision of online services offered by the Company.
- b) to manage user requests for information.
- c) to comply with the legal obligations to which the Company is subject.
- d) to collect information related to the use of the Site (such as frequency of use, statistics, etc.) using cookies (see the “Cookie Policy” section).

With regards to the purposes set out in points a), b), c), and d) above, providing personal data is mandatory and does not require your consent. Any refusal to provide the data could result in the Company being unable to provide the requested service, fulfill legal obligations, or process and respond to user requests. Providing personal data through the contact forms on the Site is not a legal or contractual requirement, but the fields marked with an asterisk are mandatory as they are needed to fulfill your request.

The processing of personal data for the purposes referred to in point d) requires consent; providing such data is optional, and any refusal will have no consequences.

Processing Methods and Data Retention

Within the Company’s organizational structure, personal data will be processed by people authorized to process the data, acting under the authority of the Data Controller, who have been suitably instructed by the Controller. The data will be processed primarily by electronic means, in compliance with the principles applicable to personal data processing under art. 5 of the Regulation.

Your data will be retained for the period necessary to fulfill legal obligations.

The retention period of the data depends on the purposes for which they are processed and may therefore vary. The criteria used to determine the applicable retention period are as follows: the personal data covered by this notice will be stored

for the time necessary (i) to manage the contractual relationship with the user, (ii) to manage user complaints or specific requests, (iii) to assert rights in court, and (iv) for the time provided by applicable laws and regulations.

Disclosure, Dissemination, and Transfer of Data

Personal data will not be disseminated and may be disclosed to other companies, competent authorities, or public or private entities for the performance of obligations required by law.

The personal data collected may be processed by third-party providers, acting as processors in relation to the services provided on behalf of the Company under specific contractual agreements, as needed for occasional maintenance operations and to fulfill specific requested services.

Rights of the Data Subject

With regards to the processing of data described herein, the data subject may exercise the rights provided by the Regulation (Articles 15–21), including:

- Receive confirmation of the existence of personal data concerning them and access their content (right of access).
- Update, modify, and/or correct their personal data (right to rectification).
- Request the deletion or restriction of processing of data processed in breach of the law, including data whose retention is not necessary in relation to the purposes for which the data were collected or otherwise processed (right to erasure and right to restriction).
- Object to the processing (right to object).
- Withdraw consent, where given, without prejudice to the lawfulness of the processing based on the consent provided before its withdrawal.
- Lodge a complaint with the supervisory authority in the event of a breach of the rules on personal data protection.
- Receive a copy of the data in electronic format that concerns them, which were provided in the context of the employment contract, and request that such data be transmitted to another controller (right to data portability).

Requests relating to the exercise of the above rights may be addressed to the Data Protection Officer by sending an email to: domenico.morano@groupmcm.com