

Marchesini Group SpA

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VISITORS PRIVACY POLICY

Ed.02

DPMS

Data Protection Management System

Compliance with EU Regulation 2016/679

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REVISIONS

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Attention! The information contained in this document is aimed at individuals who access the premises of the company **Marchesini Group SpA** (hereinafter simply "Company" or "**Marchesini**") as a guest/visitor.

0. DOCUMENT TAB

0.1. REVISION TABLE

Ver.	Date	Publication process	Description of the change
*00	01/01/2024	Issued by: CPDA Verified by: CFO Approved by: DDT	First issue in the DPMS system

Attention! This document replaces the previous visitor privacy information released on 25/05/2018

0.2. NORMATIVE REQUIREMENTS

Title	Note
EU Regulation 2016/679	General Data Protection Regulation (GDPR)
Legislative Decree 196/2003	Privacy Code
Legislative Decree 101/2018	Implementation decree of EU Reg. 2016/679

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1. RECIPIENTS OF THE DOCUMENT

This information is issued to you regarding the acquisition of your personal data following your request for access to the premises of **Marchesini Group S.p.A.** as a guest/visitor.

2. PREMISE

In compliance with the indications provided for by Regulation (EU) 2016/679 (hereinafter, "Regulation" or "GDPR") regarding the processing and free movement of personal data, you have the right to know all the information regarding the processing of personal data. Your personal data in a clear and transparent way. Therefore, in compliance with this principle, we intend with this document to inform you regarding the processing of your personal data.

3. DEFINITIONS

The definitions of the terms used in this document are to be understood as per art. 4 of [EU Regulation 2016/679](#).

4. DATA CONTROLLER OF PERSONAL DATA

Marchesini Group S.p.A. (hereinafter simply **Marchesini**) is the Owner of the Processing of your personal data pursuant to the Regulation. Below is your contact information:



Marchesini Group S.p.A.

Legal and operative site: Via Nazionale, 100 - 40065 Pianoro (BO) Italy

VAT noIT 00680201209 – Tax code: 03943970370 - REA code: BO - 327089

PEC: pec@pec.marchesini.com

Telephone +39 051 0479111

e-mail: privacy@marchesini.com

4.1. DATA PROTECTION OFFICER - DPO

Marchesini has appointed the Personal Data Protection Officer. You can contact the Data Protection Officer (DPO) at the following email address: dpo@marchesini.com.

4.1. DATA PROTECTION COORDINATOR

Marchesini also pursuant to art. 2-quaterdecies of Legislative Decree 196/2003 (so-called "Privacy Code), has appointed a company Data Protection Coordinator with the task of supervising the compliance of processing with the GDPR. The Data Protection Coordinator is at your disposal for any clarification or information regarding the processing of your personal data and to facilitate the possible exercise of the rights that are recognized by the Regulation.

You can contact the Data Protection Coordinator at the following email address: privacy@marchesini.com.

5. TREATMENT

5.1. WHY WE ASK YOU FOR YOUR DATA

The personal data relating to you and all other relevant information voluntarily provided by you or your organization to our Company or deduced by us during your visit, (hereinafter, the "Data"), will be processed, to allow your safe access to our premises. This will involve your identification (e.g. we will see your identity document) and the recording of some identification and contact data.

Furthermore, from the information collected, we will be able to verify your presence within our premises or contact your organization in the event of accidents or disasters.

5.2. WHAT ARE THE PURPOSES

- F1. ensure the security of access to our reserved areas;*
- F2. prevent crimes and/or abuse and take protective actions to protect the interests of the Company or those of third parties such as, for example, exercising defence in court and/or asserting rights;*
- F3. guarantee the safety and health of visitors within our premises in the event of accidents, disasters or needs;*
- F4. fulfill legal obligations, regulations and community legislation, or deriving from instructions given by public authorities or supervisory bodies;*
- F5. achieve, maintain and demonstrate certifications or accreditations, comply with regulatory standards, apply specific ethical, conduct or deontological codes;*
- F6. (if any) fulfill our confidentiality obligations by transferring these obligations to our visitors, by signing specific NDA confidentiality agreements based on the information that the visitor may become aware of, even accidentally, during his visit.*

5.3. BECAUSE WE CAN DO IT

For the purposes stated above, we may process your personal data on the basis of the following lawfulness bases.



LEGITIMATE INTEREST pursuant to art. 6, paragraph 1, letter f) of the GDPR.

We believe it is our legitimate interest to pursue purposes F1, F2, F3 and F5 and carry out all the processing deemed necessary to guarantee adequate protection of our assets, the safety of our visitors, achieve/maintain certifications and accreditations with customers and respect the standards of sector.



LEGAL OBLIGATION pursuant to art. 6, paragraph 1, letter c) of the GDPR.

For the F4 purpose, the processing of your personal data will be carried out to fulfill legal obligations or provisions of the Authorities. For example, the obligations established by the Legislative Decree. 81/2008 regarding workplace safety or Authority measures for the containment of the health emergency.



CONTRACTUAL OBLIGATION pursuant to art. 6, paragraph 1, letter b) of the GDPR.

For purpose F6, processing is necessary to fulfill contractual obligations to which we are bound.

5.4. WHERE YOUR PERSONAL DATA COMES FROM

The data is generally provided by you to our authorized personnel by completing the appropriate access registration form (register) or during your stay on our premises. However, some information about you may be provided by your organization or collected by us during your visit.

5.5. WHAT TYPE OF PERSONAL DATA WILL BE PROCESSED

- name, surname, company, date, entry and exit time;
- your identity document if we have not already identified you in another way;
- his signature;
- reason for the visit, any accompanying assets;
- any statements or other relevant information voluntarily provided by you or obtained by us during your visit.

5.6. MANDATORY OR OPTIONAL NATURE OF THE PROVISION OF DATA

The communication of your personal data, although voluntary and optional, is a binding requirement to obtain access to specific areas of our company. Furthermore, the registration of your presence within our premises may, in some cases, be mandatory to comply with the obligations of specific laws regarding health safety in the workplace (e.g. Legislative Decree 81/2008).

5.7. CRITERIA OR STORAGE TIMES

For purposes F1, F2 and F5, we will retain your personal data for a period of 24 months. This period is deemed adequate to satisfy our organizational needs regarding any investigation into security violations, provided that it is not necessary to retain them further to defend or assert a right, or any further legal obligations or, finally, upon order of the Public Authorities .

For the F3 purpose, your data could be deleted the day after registration (achievement of the purpose), however, the access register is unique and the purposes are therefore unified at the same retention times.

For the F4 purpose we will retain your personal data for the limitation period established by the legislation for the protection of related rights, without prejudice in any case to longer retention periods provided for by specific sector regulations.

For purpose F6, the documents will be kept for the entire duration of the confidentiality obligation and subsequently for 20 years.

6. FURTHER TREATMENTS



If, during your visit, further and specific treatments should become necessary, not indicated in this information, it will be **Marchesini** provide you and/or your organization with specific information in advance and, if necessary, proceed to acquire the necessary consent.

7. PRINCIPLES APPLICABLE TO DATA PROCESSING

From the information gathering phase, every treatment performed by us will respect the principle of relevance and not excess by virtue of the purposes pursued by it. We inform you that access to your personal data by the persons in charge is permitted only if knowledge is deemed strictly indispensable for the pursuit of the purposes illustrated in this document.

8. PROCESSING METHODS

With logic strictly related to the collection purposes, in **Marchesini** we adopt and observe strict procedures and security measures to conserve, use and allow viewing of your personal data using paper, IT and telematic tools, in order to always guarantee their protection from unauthorized or illicit processing and from loss, destruction or from accidental damage.

In particular, your data is:

- collected exclusively for the declared purposes and subsequently processed in compliance with the same;
- adequate, relevant and limited with respect to the purposes declared above ("data minimization");
- accurate and, if necessary, updated, cancelled and/or rectified, also based on your indications;
- used and stored for a period of time not exceeding the achievement of the purposes for which they are collected.

9. SECURITY OF PERSONAL DATA

Marchesini has taken steps to identify the risks for the rights and freedoms of the interested parties involved in the processing declared in this information, also considering the risks looming over the IT systems used for such processing. The risks were subsequently assessed, analysing the sources of risk and mitigating the threats capable of materializing them through the adoption of technical and organizational measures deemed adequate.

10. SCOPE OF COMMUNICATION AND DISSEMINATION OF DATA

For the pursuit of the declared purposes and within the limits of what is strictly necessary, **Marchesini** makes use of the activities of external parties with whom specific agreements have been stipulated on the processing of personal data to regulate the Ownership/Responsibility relationships pursuant to the Regulation (e.g. external parties who carry out technical, commercial, legal, administrative consultancy activities, companies that provide IT services in the Cloud, data processing, shipping and transport services, banks, bodies, public administrations, authorities, supervisory bodies, etc.).

Internally, the subjects involved in the processing of your personal data are bound to confidentiality, adequately trained and appointed as "Authorized" subjects for processing.

Without prejudice to any legal obligations, your personal data will not be disclosed in any way except for the purposes referred to in the art. 5.2.

11. TRANSFER OF DATA ABROAD

For the purposes stated in this information **Marchesini** does not transfer your data outside the European Economic Area (EEA).

12. RIGHTS OF THE INTERESTED PARTY

As a person interested in the processing of your personal data, you may exercise the rights recognized by articles 15 to 22 of the Regulation at any time.

In particular, in the manner and within the limits of the law, you have the right to ask our Company for access to your personal data, rectification, cancellation or limitation of the processing of personal data concerning you and to oppose their processing. To exercise your rights you can use the contact channels provided in this document.



You can obtain more information on the rights applicable to the processing declared in this information within the [ANNEX A](#)

13. COMPLAINT TO THE SUPERVISORY AUTHORITY (ART. 77 GDPR)

Without prejudice to the possibility of contacting **Marchesini** to obtain any information or to exercise your rights, we inform you that you can lodge a complaint before the competent independent administrative authority in the Member State of the European Union where you habitually reside, where you work, or where you believe an alleged violation has occurred of the law on the protection of your personal data. In Italy you can lodge a complaint with the Guarantor for the Protection of Personal Data (GPDP).

For information on how to submit your complaint to the Authority you can use the following contact details:



Guarantor for the protection of personal data

Contact center: +39 06.696771

Email address: garante@gpdp.it

PEC address: protocol@pec.gpdp.it

Website: <https://www.garanteprivacy.it>

14. INFORMATION UPDATE

This information, **MPAZ.IN.DPMS006 “VISITORS PRIVACY POLICY” Version 00** effective from **01/01/2024**, replaces the previous one released on 05/25/2018. The document is periodically revised based on regulatory and/or company changes.



You can find the updated version of this information on the institutional website of **Marchesini Group S.p.A.** at the following link: <https://marchesini.com/privacy>

ANNEX A

GUIDE TO THE EXERCISE OF THE RIGHTS APPLICABLE TO THE PROCESSING DECLARED IN THE VISITORS
INFORMATION MPAZ.IN.DPMS006 VER. 00 DEL01/01/2024

RIGHT OF ACCESS (art. 15 GDPR)

As an interested party, you have the right to obtain confirmation as to whether or not we are processing personal data concerning you and, if so, to obtain access to the following information:

1. the purposes of the processing;
2. the categories of personal data in question;
3. the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if recipients are from third countries or international organisations;
4. when possible, the expected retention period of personal data or, if this is not possible, the criteria used to determine this period;
5. the existence of the right of the interested party to ask the data controller to rectify or delete personal data or limit the processing of personal data concerning him or to oppose their processing;
6. the right to lodge a complaint with a Supervisory Authority;
7. if the data were not provided directly by you, all available information on their origin;
8. the existence of an automated decision-making process, including profiling and, at least in such cases, significant information on the logic used, as well as the consequences of such processing towards you;
9. if your personal data are transferred to a third country or to an international organisation, you have the right to be informed of the existence of adequate guarantees pursuant to art. 45-50 of the GDPR.



Your right to obtain a copy of the data will only be granted if it is possible to do so without infringing the rights and freedoms of others. If you decide to exercise this right, we will provide you with a copy of the personal data being processed. If you request additional copies, we may ask for a fee based on the administrative costs incurred by us.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of their lawfulness basis. In particular:

	F1	F2	F3	F4	F5	F6
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Specific conditions of non-applicability

None

RIGHT OF CORRECTION (art. 16 GDPR)

You have the right to obtain from us the modification and updating of your personal data without unjustified delay. Taking into account the purposes of the processing, you have the right to obtain the integration of your incomplete personal data, including by providing us with a supplementary declaration.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of their lawfulness basis. In particular, it is applicable to the following treatments:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
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Specific conditions of non-applicability

None

RIGHT TO CANCELLATION «RIGHT TO BE FORGOTTEN» (art. 17 GDPR)

You have the right to obtain the deletion of personal data concerning you without unjustified delay.

Conditions of applicability

We guarantee you this right for the following treatments, when one of the following reasons exists:

1. when the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
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Specific conditions of non-applicability

None

2. if you have revoked the consent on which the processing is based and there is no other legal basis to continue it in the absence of your authorization. The right is not applicable to any of the treatments declared in this information:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
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Specific conditions of non-applicability

The right is not applicable as none of the processing bases its lawfulness on consent

3. if you object to the processing and there is no overriding legitimate reason on our part to proceed with the processing anyway:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
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Specific conditions of non-applicability

- The right is not applicable to F4 and F6 treatments as they are not based on legitimate interest

4. if personal data are processed unlawfully:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
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5. if the personal data must be erased to comply with a legal obligation to which we are subject as Data Controller:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
-------------------------------------	----	----	----	----	----	----

Specific conditions of non-applicability

- None

6. where the personal data have been collected in relation to the offer of information society services:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
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Specific conditions of non-applicability

- The right is not applicable to any of the treatments declared in this information.

RIGHTS LIMITATION OF THE TREATMENT (art. 18 GDPR)

This right is guaranteed for all processing carried out by us regardless of the lawfulness basis used.



The personal data subject to limitation are processed, except for storage, only with your consent or for the establishment, exercise or defence of a right in court or to protect the rights of another natural person or legal. Furthermore, we inform you that the interested party who has obtained the limitation of processing is informed by the data controller before said limitation is revoked

Conditions of applicability

You have the right to obtain the limitation of processing when one of the following hypotheses occurs:

1. You have contested the accuracy of the personal data; the limitation will be applied for the period necessary to allow us to verify the accuracy of such data:



Specific conditions of non-applicability

None

2. the processing is unlawful and you oppose the deletion of your personal data, asking instead that their use be limited:



Specific conditions of non-applicability

None

3. although we no longer need them for the purposes of the processing, you need the personal data for the establishment, exercise or defence of legal claims:



Specific conditions of non-applicability

None

4. You objected to the treatment; the limitation will be applied pending verification of the possible prevalence of our legitimate reasons for continuing the same:



Specific conditions of non-applicability

The right is not applicable to F4 and F6 treatments as they are not based on legitimate interest.

RIGHT TO NOTIFICATION (art. 19 GDPR)

You have the right to obtain direct communication from us to each of the recipients to whom your personal data has been transmitted, regarding your requests for rectification or deletion or limitation of processing,

unless this proves impossible or involves effort. disproportionate. Furthermore, if you deem it appropriate, you have the right to obtain the list of recipients of your data.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of the lawfulness basis used:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
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Specific conditions of non-applicability

None

RIGHT TO DATA PORTABILITY (art. 20 GDPR)

You have the right to receive the personal data concerning you provided to us in a structured, commonly used and machine-readable format and you have the right to obtain from us the direct transmission of such data to another data controller if technically doable.

Conditions of applicability

This right is guaranteed only for processing which has consent or contract as its legal basis and is carried out by automated means:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
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Specific conditions of non-applicability

The right is not applicable to the treatments declared in this information

RIGHT TO OBJECT (art. 21 GDPR)

You have the right to object at any time to processing of your personal data based on our legitimate interest, including profiling.



We will refrain from further processing your personal data only if we are unable to demonstrate the existence of legitimate reasons that override your interests, rights and freedoms. The processing will continue even if the data are necessary for the establishment, exercise or defence of our rights or those of third parties in litigation.

Conditions of applicability:

The legal basis of the processing must be legitimate interest. The right is applicable to the following treatments:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
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Specific conditions of non-applicability

- The right is not applicable to processing carried out for F4 and F6 purposes as they are not based on legitimate interest and to processing carried out for F2 purposes when necessary for the assessment and defence in litigation.

SPECIFIC RIGHTS IN THE CASE OF AUTOMATED DECISION MAKING(art. 21 GDPR)

You have the right not to be subject to a decision based solely on automated processing (including profiling) which produces legal effects concerning you or which significantly affects you. Furthermore, you have the right to obtain human intervention on the part of the Owner, to express your opinion and to contest the automated decision.

In any case, decisions must not be based on the special categories of personal data referred to in Article 9, paragraph 1 of the GDPR, unless Article 9, paragraph 2, letters a) or g) of the GDPR applies. GDPR, and there are no adequate measures in place to protect your rights and freedoms.

Conditions of applicability

The right does not apply if the decision:

- is necessary for the conclusion or performance of a contract between us;
- is based on your explicit consent;
- the decision is authorized by Union or Member State law.

	F1	F2	F3	F4	F5	F6
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Specific conditions of non-applicability

- The right is not applicable to any of the treatments declared in this information as none of them subjects the interested party to a decision based solely on automated processing.

RIGHT TO COMPENSATION OF DAMAGES (art. 82 GDPR)

We inform you that anyone who suffers material or immaterial damage caused by a violation of Regulation 2016/679 has the right to obtain compensation for such damage.

FORMS FOR THE EXERCISE OF RIGHTS

To exercise your rights towards **Marchesini** we recommend that you use the following form made available by the Guarantor Authority:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

We remind you that your identification is always necessary on our part.