



**MARCHESINI  
GROUP**

# **50TH ANNIVERSARY PROJECT PRIVACY POLICY**

Rendered pursuant to art. 13 and 14 of EU Regulation 2016/679

**Data Protection Management System**

**Doc. MPAZ.IN.DPMS.009 And.00**

**valid from 10/07/2023**

**L1 -PUBBLICO**

**Marchesini Group S.p.A.**

Registered office Via Nazionale, 100 - 40065 - Pianoro (BO) Italy

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## 1. PREMISE

This information is provided in accordance with articles 12, 13 and 14 of R.E. 2016/679 in accordance with the legislation on the processing and protection of personal data in order to illustrate the methods of processing personal data relating to the "***Special charity project on the occasion of the 50th anniversary of Marchesini Group. The Marchesini Group will donate a portion of the proceeds from the sale of the machinery in 2024 or delivered in 2024 to non-profit organizations operating in various territories where the group's customers are present.***" Such processing will be based on the principles of correctness, lawfulness and transparency, protecting the confidentiality and rights of all data subjects.

The information is a general obligation that must be fulfilled before or at the latest at the time of initiating the direct collection of personal data. Pursuant to the General Regulation for the Protection of Personal Data of Individuals (GDPR – R.E. 2016/679), the undersigned organization, the data controller, informs of the following.

## 2. CONTROLLER OF THE PROCESSING OF PERSONAL DATA.

### **Marchesini Group S.p.A.**

Registered and operational headquarters: Via Nazionale, 100 – 40065 Pianoro (BO) Italy

PEC: pec@pec.marchesini.com

Telephone +39 051 047 9111

email: privacy@marchesini.com

## 3. RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA

Marchesini has appointed the Data Protection Officer ("**DPO**"), pursuant to Article 37 of EU Reg. 679/2016, and can be contacted by the interested party at the e-mail address: [dpo@marchesini.com](mailto:dpo@marchesini.com).

## 4. TYPES OF DATA THAT CAN BE PROCESSED

The personal data processed fall into the following categories:

- Identification and personal data (name and surname, e-mail);
- Donation data (donation date, amount, donation destination)

## 5. PURPOSE OF THE PROCESSING AND LEGAL BASIS

The purposes of the processing of personal data are as follows:

1. fulfilment of legal obligations related to the donation;
2. management of administrative, accounting, tax and financial processes;
3. processing of data for statistical purposes;
4. sending commercial communications of the same by e-mail;

The following table specifies for each of the purposes identified above the legal basis, the categories of data, the categories of personal data and the related retention period:

Purposes of the processing for which the personal data are intended	Legal basis for the processing	Categories of personal data subject to processing	Period of storage of personal data
Purpose 1	Legal obligation	Identification data Personal data Donation details	Up to 10 years
Purpose 2	Legal obligation	Identification data Personal data Donation details	Up to 10 years
Purpose 3	Legitimate Interest Recital 47	Identification data Personal data Donation details	18 months At the end of the donation process, the data is transformed into an aggregated and anonymous form
Purpose 4	Consent	Identification data	For 24 months following the acquisition of consent

## 6. PROCESSING METHODS

With logics strictly related to the purposes of collection, we adopt and observe strict procedures and security measures to store, use and allow you to view your personal data using paper, computer and telematic tools, so as to always guarantee their protection from unauthorized or unlawful processing and from loss, destruction or accidental damage. **Marchesini Group**

In particular, your data are:

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

To achieve the purposes of this policy, we do not make automated decisions based on your personal data. **Marchesini Group**

## 7. NATURE OF THE PROVISION

For the F1 and F2 purposes of this policy, the provision of personal data is a necessary requirement and any refusal to provide the requested information could totally or partially prevent the performance of the

activities aimed at the fulfilment of the project, or the fulfilment of legal obligations, regulations deriving from EU legislation, or deriving from instructions given by public authorities or supervisory bodies.

## **8. LEARN MORE ABOUT THE RETENTION PERIOD**

Your data are kept for a period of time not exceeding that necessary for the pursuit of the purposes for which they were collected, in accordance with legal obligations or in any case to allow the Company to protect its own rights and interests or those of third parties.

## **9. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA**

In order to pursue the purposes stated in this document and within the limits of what is strictly necessary, **Marchesini Group** avails itself of the activities of external parties with whom specific agreements are stipulated on the processing of personal data to regulate the relationships of **Ownership/Responsibility** pursuant to the Regulation (e.g. external parties that 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 parties involved in the processing of your personal data are bound by confidentiality. Without prejudice to any legal obligations, your personal data will not be disseminated in any way.

## **10. DATA TRANSFER TO A THIRD COUNTRY**

For the purposes stated in this policy, we do not transfer your data outside the European Economic Area (EEA). However, if your personal data is transferred to countries outside the European Economic Area (EEA), in the absence of adequacy decisions by the Commission of the European Union, we will ensure that appropriate safeguards are in place to protect your personal data in these countries. Some of the safeguards that may be in place, where appropriate, include the use of standard contractual clauses approved by the European Commission, pseudonymisation and, if possible, encryption of the data itself. **Marchesini Group** By way of example, but not limited to, we inform you that the transfer abroad of your personal data is often linked to the use of cloud technologies, digital communication systems, security software and protection of IT services.

In this regard, we inform you that we use some ICT services, provided by US companies such as, for example, Microsoft, Google and Apple which operate as our Data Processors pursuant to Article 28 of the GDPR. **Marchesini Group**

However, while selecting, where possible, the provision of such services through Data Centers located within the EEA, the Data Processor may have to allow access to our data to the American authorities as a result of the so-called "Cloud ACT".

## **11. RIGHTS OF DATA SUBJECTS AND COMPLAINT TO THE SUPERVISORY AUTHORITY (ART. 77 GDPR)**

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

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, the rectification, erasure or limitation of the processing of your personal data and to

object to their processing. To exercise your rights, you can use the contact channels provided in this document.

Without prejudice to the possibility of contacting the competent independent administrative authority in the Member State of the European Union where you habitually reside, where you work, or where you believe that an alleged violation of the law on the protection of your personal data has occurred. In Italy, you can lodge a complaint with the Italian Data Protection Authority (GPDP). For information on how to lodge your complaint with the Authority, you can use the following contact details: **Marchesini Group**

 **Guarantor for the protection of personal data**

Switchboard: +39 06.696771

E-mail address: [garante@gpdp.it](mailto:garante@gpdp.it)

PEC address: [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it)

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

## 12. CHANGES TO THE POLICY

The document is periodically revised according to regulatory and/or company changes.

In the event of a change in its fundamental parts (such as the purposes, methods, to whom we communicate the data, where we transfer them, etc.), it will be our Company's responsibility to inform you of the change.



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