



WEBSITE PRIVACY NOTICE

ARTICLE 13 OF THE GENERAL DATA PROTECTION REGULATION
EU 2016/679 (GDPR)

| JANUARY 2024 |

DATA CONTROLLER. WHO PROCESSES THE DATA?

Master Group s.r.l. with legal headquarters at Via SS. 18, Km. 484/800 – 89015 Palmi (RC)
VAT Number 02175870803 – privacy@mgto.it"

PURPOSES AND LEGAL BASIS OF DATA PROCESSING. WHY ARE PERSONAL DATA PROCESSED?

Personal data, for the purposes strictly necessary for browsing the website, will be processed using IT/telecommunication tools, processed automatically, and collected in an aggregated form exclusively to verify the proper functioning of the site, as well as for security reasons. Data processing will be carried out using tools and methods designed to ensure confidentiality and data security, in compliance with the applicable national and European regulations. Specific security measures are taken to prevent data loss, unlawful or incorrect use, and unauthorized access.

Except for navigation data, which is necessary for IT and telecommunication protocols, we will process personal data to:

- Provide assistance and respond to requests received;
- Execute a contract in which the user is a party or to carry out pre-contractual measures;
- Send commercial communications to the provided email address if you are already our customer, regarding services and/or products of the Data Controller similar to those previously purchased by the user;
- Comply with legal obligations, regulations, and orders from Authorities (requirements established by national and community regulations, also to determine responsibility in the event of cybercrimes against the website).

These data may be processed, in accordance with applicable law, without the need to request explicit consent.

In case you wish to receive our informational newsletters, the data will be processed only after obtaining explicit consent. Each email sent will allow you to reject further mailings by clicking on the provided link. "***

LEGITIMATE INTEREST OF THE DATA CONTROLLER

To satisfy a legitimate interest of the Data Controller, in compliance with current regulations, personal data will be processed in order to improve our products or services and to protect our rights

RECIPIENTS OF PERSONAL DATA. WITH WHOM IS PERSONAL DATA SHARED?

Personal data is processed by the Data Controller's collaborators and consultants, who are given appropriate instructions regarding the measures, precautions, and procedures aimed at ensuring the effective protection of personal data.

Exclusively for purposes related to the performance of the requested service, personal data may be disclosed only to other parties providing services. These parties will process the data as Data Processors if they handle the data on behalf of **Master Group s.r.l.**, or as Data Controllers if they process the data independently.

Additionally, other parties may include the Data Controller's agents or intermediaries, in order to fulfill the received requests and to provide better and faster service

TRANSFER OF PERSONAL DATA OUTSIDE THE EU. WHERE IS THE DATA?

The data is located in Italy and is not transferred to companies located outside the European Union.

If, in accordance with the above and for the purposes indicated, it becomes necessary to transfer personal data abroad (outside the EU), such transfer will take place provided that the destination country has been deemed appropriate for data transfer by the European Commission pursuant to Article 45 of Regulation 2016/679 (adequacy decision) or, in the absence of such a decision, if one of the conditions provided for in Articles 46 and 47 of the same Regulation applies (in particular, standard contractual clauses or binding corporate rules), to ensure proper processing of personal data

DATA RETENTION. HOW LONG IS PERSONAL DATA STORED?

For the processing purposes indicated in this notice, personal data will be stored for the time necessary to achieve the purposes for which it was collected.

Once the indicated periods have expired, the data may be anonymized and used for statistical purposes.

- **Business relations:** data related to invoicing and communications is retained for ten (10) years from the date of the last record.
- **Browsing data:** the IT systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This data is used solely to obtain anonymous statistical information on the use of the website and to check its correct functioning, and is deleted after processing or, in any case, at the end of the session.
- **Data voluntarily provided by the user:** the voluntary, explicit, and optional

sending of emails to the addresses indicated, and the completion of the contact form on this website, entails the subsequent acquisition of the sender's email address (necessary to respond to requests), as well as any other personal data included in the message. Such data is stored for the time necessary to fulfill the received requests. Once that period has expired, the data will be deleted, unless retention is required for other purposes expressly provided by law (e.g., legal retention obligations). The data retention period is set for a maximum of twenty-four (24) months from the last contact;

- **Data provided for newsletter subscription:** unless consent is withdrawn earlier, the data will be retained for a period of twenty-four (24) months;
- **Cookies:** please refer to the detailed cookie policy available on the website."**

DATA SUBJECT RIGHTS. WHAT ARE THE RIGHTS AND HOW CAN THEY BE EXERCISED?

In accordance with current regulations, the user has specific and inalienable rights concerning the processing of their personal data. In particular:

- **Right of access:** to request information at any time about personal data. This includes the categories of data processed by the Controller, the purposes of the processing, the source of the data if not obtained directly from the data subject, and the recipients to whom the data may have been transferred.
- **Right to rectification:** to request corrections to personal data. The Controller will take appropriate steps to ensure that the data it holds is accurate, complete, up-to-date, and relevant, based on the latest information received.
- **Right to erasure:** to request the deletion of personal data, provided that the legal conditions are met. For example, this may occur if the data is no longer necessary for the purposes for which it was collected or otherwise processed; if consent is withdrawn and there is no other legal basis for processing; or in the case of objection to the processing, especially for direct marketing purposes.
- **Right to restriction of processing:** to request that the processing of data be limited if the data is inaccurate or no longer needed.
- **Right to object:** to object at any time to the processing of data, unless doing so conflicts with current regulations or if the Controller has legitimate interests that prevail, such as establishing, exercising, or defending a legal claim.
- **Right to data portability:** to receive a copy of the data previously provided, in a structured, commonly used and machine-readable format, and to request its transfer to another data controller where technically feasible.

Additionally, the user is informed of the right to:

- **Withdraw consent at any time:** if the processing is based on consent, without affecting the lawfulness of processing based on consent before its withdrawal. The Controller undertakes to handle all requests within a reasonable period, generally within thirty (30) days, unless an extension is justified and communicated.

- **File a complaint:** if the user believes their personal data is not being processed in accordance with applicable law, they may file a complaint with the Data Protection Authority or alternatively lodge a claim with the competent judicial authority.

To exercise their rights, the data subject may send a request to the contact details of the Data Controller indicated in this document. Requests are processed free of charge and handled as promptly as possible, in any case within one (1) month.