



MOTTURA SERRATURE DI SICUREZZA S.p.A.
Strada Antica di Francia, 34
10057 Sant'Ambrogio - Torino - Italy
Tel. +39.011.93.43.111
Fax +39.011.93.12.427
Web : www.mottura.it



Information notice pursuant to Article 13 of Regulation (EU) 679/2016 on the processing of personal data of data subjects

Pursuant to Article 13 of Regulation (EU) 679/2016 of the European Parliament and of the Council of 27 April 2016 on the protection of data (hereinafter referred to as the "Regulation" or the "GDPR"), in relation to the processing of your personal data, Mottura Serrature di Sicurezza S.p.a. (hereinafter for the sake of brevity referred to as "Mottura" or the "Data Controller), whose identity and contact information are listed below,

hereby informs you, in your capacity as data subject,

of the following:

1) Data Controller identity and contact information.

Mottura Serrature di Sicurezza S.p.a., with registered office in **Sant'Ambrogio di Torino (TO), Strada antica di Francia n° 34**, acting through its legal representative *pro-tempore*, tel.: **+390119343111**, fax: **+390119312427**, email: privacy@mottura.it, pec: amministrazione@pec.mottura.it.

is the Data Controller pursuant to Articles 4 and 24 of the Regulation. You may contact the Data Controller by writing to the aforementioned address.

2) Purposes of the processing for which the personal data are intended and the legal ground for the processing.

Any personal data you provide to the undersigned Data Controller will be processed exclusively for the purposes related to performance of the contract you are a party to or will enter into with the Data Controller, in compliance with the provisions indicated in Article 13 of the Regulation. "Purposes related to performance of the contract" means any processing of data related to the management, administration and fulfilment of the contractual relationship in question. The legal ground of processing for the aforementioned purposes is Article 6, paragraph 1, letter b) of the GDPR ("*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*"). In the context of said purposes, the processing is also carried out to comply with specific legal obligations relating to the management of the contractual relationship (for example, accounting and/or tax obligations). The legal ground of processing for the aforementioned purposes is Article 6, paragraph 1, letter c) of the GDPR ("*processing is necessary for compliance with a legal obligation to which the controller is subject*").

3) Categories of personal data

If the Data Controller obtained your personal data from a source other than yourself (for example, agents appointed by the Data Controller), it is specified that the following categories of personal data may be processed by the same Data Controller:

- identification and contact data;
- data on supplies provided;
- data concerning the types of activities carried out by customers and suppliers.

4) Special categories of personal data

If, in the performance of the contract or to comply with specific legal obligations related to management of the contractual relationship, the undersigned Data Controller is also required to collect data that falls within the special categories of personal data referred to in Article 9 of the Regulation (in particular, personal data that reveal the "*racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation*"), said categories of data may only be processed upon you freely and explicitly providing your consent.

The legal ground of processing of any personal data you provide that falls within the special categories of personal data referred to in Article 9 of the Regulation will be your specific consent pursuant to Article 9,



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paragraph 2, letter a) of the Regulation (“*the data subject has given explicit consent to the processing of those personal data for one or more specified purposes*”).

5) Personal data processing methods.

In relation to the aforementioned purposes, your personal data will be processed by manual, computerised and telematic means for the mere fulfilment of the purposes themselves and, in any event, to guarantee the security and confidentiality of the same data, in accordance with the provisions of Article 32 of the Regulation on security measures and by specifically authorised persons, in accordance with the provisions of Article 29 of the Regulation.

6) Recipients or categories of recipients of personal data.

Any personal data you provide will be processed by means of subjects expressly and specifically designated by the Data Controller who operate in the interest of the latter in their capacity as Data Processors (Article 28 of the Regulation) or as persons acting under the authority of the Data Controller or Processors (Article 29 of the Regulation) within the terms under the Regulation and provisions adapting Italian legislation to comply with the GDPR. Any personal data provided may also be processed by the Data Controller directly and also communicated to third parties if said processing is functional to legal obligations and performance of the contract. For the purpose of said communication, the data may be brought to the attention of companies or external professionals whose collaboration the Data Controller may avail of for the purposes indicated in this information notice.

Personal data may be communicated, in order to allow fulfilment of contractual and legal obligations, to post offices, forwarding agents and couriers in order for documentation to be sent, as well as to banking institutions to enable account management deriving from performance of the contract, as well as to Public Administrations pursuant to law, as well as to third parties for the provision of information technology or archiving services.

The personal data of data subjects will not be disseminated and the Data Controller will not provide any information or make personal data available to indeterminate parties in any way.

7) Transfers of personal data to third countries or international organisations.

As a rule, no personal data of data subjects will be transferred to a third country outside the European Union or to international organisations. Should this become necessary in performance of the contract the data subject is a party to or will enter into with the Data Controller, the latter undertakes to ensure that any such transfer will occur in accordance with the provisions of Articles 45 (on the basis of an adequacy decision of the Commission) and 46 (on the basis of the existence of appropriate safeguards), if applicable, or in any event pursuant to Article 49 of the Regulation.

8) Period of retention of personal data.

Personal data collected for processing will be retained in compliance with the provisions of Article 5, paragraph 1, letter e) of the Regulation in a form that enables identification of the data subject for a period no longer than is necessary for the aforementioned purposes for which the personal data has been collected and is processed.

Personal data is retained in accordance with the following criteria: (a) for the period of time strictly necessary for the “purposes related to performance of the contract” for which the personal data is processed and in any event for a period not exceeding 10 (ten) years; (b) for the period of time strictly necessary to comply with legal obligations, regulations or provisions issued by supervisory and control bodies.

At the end of the period of retention, your data will be deleted or stored anonymously.

9) Rights of data subjects.

Pursuant to Articles 15 et seq. of the Regulation, you, in your capacity as data subject, are entitled to request from the Data Controller:

- access to your personal data;



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- rectification or erasure of your personal data or restriction of the processing of any data concerning you;
- to oppose processing;
- data portability;
- if the processing is based on Article 6, paragraph 1, letter a) or Article 9, paragraph 2, letter a) of the Regulation, withdrawal of your consent at any time, without affecting the lawfulness of processing based on consent before said withdrawal.

Pursuant to Article 77 of the Regulation, without prejudice to any other administrative or judicial remedy, data subjects shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the GDPR (in Italy the supervisory authority is the Supervisory Authority for the protection of personal data - *Garante per la protezione dei dati personali*).

To exercise the aforementioned rights, the data subject may contact the Data Controller at the addresses indicated in point 1 of this information notice.

10) Source from which personal data originate.

If the Data Controller obtained your personal data from a source other than yourself, it is specified that your data was obtained from Agents appointed by the Data Controller.

11) If the provision of personal data is a legal or contractual requirement, or a requirement necessary to enter into a contract; possible consequences of failure to provide such data;

Communication of your personal data and consequent processing of the same by the Data Controller is required to establish, continue and correctly manage the relationship in question; said communication, therefore, is to be understood as mandatory.

If you refuse to provide the personal data required, the Data Controller may not be able to conclude and manage the contractual relationship you are a party to or will enter into.

12) Existence of an automated decision-making process, including profiling.

Pursuant to Article 13, paragraph 2, letter f) of the GDPR, we would like to inform you that any personal data collected will not be used for any automated decision-making processes, including profiling referred to in Article 22, paragraphs 1 and 4 of the Regulation.

13) Processing for purposes other than those for which the personal data was collected.

Where the data controller intends to further process your personal data for a purpose other than that for which your personal data was collected, the controller shall provide you, the data subject, prior to any such further processing with information on any such other purpose and with any relevant further information as referred to in Article 13, paragraph 2 of the Regulation.

The Data Controller
Mottura Serrature di Sicurezza S.p.a.