INFORMATION ON THE PROCESSING OF PERSONAL DATA - CUSTOMERS –

Dear Customer, we wish to inform you that, pursuant to Article 13 of EU Regulation 2016/679 (General Data Protection Regulation – hereinafter the "GDPR"), the personal data you provide will be processed by our Company. The processing will be carried out in compliance with the principles of lawfulness, fairness, transparency, confidentiality and protection of the rights of the data subject.

1. Data Controller

The data controller: S.M.T. S.r.l.

Registered office: Corso Buenos Aires n. 64 – 20124 Milan (MI).

E-mail address with which to contact the Data Controller: info@smtsrl.com

2. Data Protection Officer (DPO)

The Company has not appointed a Data Protection Officer (DPO), as the conditions set out in art. 37 of the GDPR are not met.

3. Types of data collected

The provision of personal data is necessary for the management of the contractual and/or professional relationship. The personal data collected includes:

a) personal data of the customer and/or company contact persons, such as name, surname;
b) contact details, such as e-mail address, telephone number;
c) data relating to the company to which they belong and the role held;
d) data necessary for the management of the contractual, administrative and commercial relationship;
e) any additional data necessary for the management of the relationship and the provision of services.

4. Purposes of the processing for which the data are intended

The personal data you provide will be used for the following purposes:

a) to manage the contractual and commercial relationship with the customer;
b) to comply with legal, administrative, accounting and tax obligations;
c) to manage the operational and organisational relationships connected with the services provided;
d) to protect the rights of the Data Controller, including before the courts.

5. Nature of the provision and legal basis of the processing

The provision of personal data is necessary for the execution of the contractual relationship and for compliance with the legal obligations to which the Data Controller is subject; any refusal to provide such data will make it impossible to establish or continue the relationship.

The processing of personal data is based on the performance of a contract to which the data subject is a party, pursuant to art. 6, par. 1, letter b) of the GDPR, as well as on compliance with legal obligations pursuant to Art. 6, par. 1, letter c) of the GDPR.

In addition, the processing may be based on the legitimate interest of the Data Controller in managing the commercial, organisational and project-related relationship, as well as in protecting its rights, pursuant to art. 6, par. 1, letter f) GDPR.

The Data Controller does not adopt automated decision-making processes, including profiling, pursuant to art. 22 of the GDPR.

6. Processing methods

The processing will be carried out by automated and/or manual means, using methods and tools that comply with the security measures referred to in art. 32 of the GDPR, by specifically authorised persons, in compliance with the provisions of art. 29 of the GDPR.

Suitable security measures will be adopted to ensure the confidentiality of personal data and to prevent unauthorised access by third parties and/or unauthorised personnel.

The Data Controller adopts appropriate technical and organisational measures aimed at preventing unauthorised access to, disclosure, alteration or destruction of personal data.

7. Retention

In compliance with the principles of lawfulness, purpose limitation and data minimisation, personal data will be stored for the time necessary to manage the contractual relationship and, subsequently, for the period required by legal obligations, normally equal to 10 years, without prejudice to any legal obligations or requirements connected with the protection of the Data Controller's rights.

Data relating to assistance activities, complaints or litigation may be retained for a longer period where necessary for the protection of the Data Controller's rights.

At the end of the retention periods stated above, the personal data will be deleted or anonymised.

8. Scope of communication and dissemination

The data collected will not be disseminated. The data may be communicated, within the limits of the purposes indicated above, to:

- public bodies and competent authorities in the cases provided for by law;
- consultants and professionals, such as accountants and legal advisors;
- providers of IT, management and data storage services;
- any other parties carrying out activities that are instrumental or supportive to the services provided.

The recipients of the data will process them, as the case may be, as specifically appointed Data Processors or as independent Data Controllers.

9. Transfer of data to non-EU countries

The Data Controller does not systematically transfer personal data to countries outside the European Union. However, if it becomes necessary to use cloud services or suppliers established in non-EU countries, the transfer will be carried out in compliance with the provisions of art. 44 of the GDPR, adopting the appropriate safeguards provided for by the applicable legislation.

10. Rights of the data subject

At any time, you may exercise the following rights against the Data Controller, pursuant to art. 15 to 22 of the GDPR:

- to obtain confirmation as to whether or not personal data concerning you exist and access such data;
- to obtain information on the purposes of the processing, the categories of data processed, the recipients or categories of recipients to whom the data have been or will be disclosed and, when possible, the retention period;
- to obtain the rectification of inaccurate data or the completion of incomplete data, as well as the erasure of data or the restriction of processing in the cases provided for by law;
- to receive personal data in a structured, commonly used and machine-readable format, as well as to transmit them to another Data Controller, where applicable;
- to object to the processing in the cases provided for by law;
- to withdraw any consent given, without prejudice to the lawfulness of the processing based on consent before its withdrawal;
- to lodge a complaint with the competent supervisory authority, the Italian Data Protection Authority.

11. Information not contained in this policy

Further information in relation to the processing of personal data may be requested at any time from the Data Controller using the contact details provided above.