

PRIVACY POLICY

Processing of Personal Data of Maccaferri Software Suite's Users

Pursuant to Articles 13 and 14 of EU Regulation 679/2016 ("GDPR"), this Privacy Policy concerns the processing of users' personal data collected and stored in Maccaferri Software Suite ("Platform"). Officine Maccaferri S.p.A. ("Data Controller") has developed this Platform that collects all Maccaferri Software. The software assists in the design of engineering solutions that include the use of Maccaferri Products.

Data Controller considers the right to privacy and the protection of your personal data to be of utmost importance. Data Controller protects users' personal data in compliance with applicable law and its Data Protection Policies.

1. DATA CONTROLLER

Officine Maccaferri S.p.A.

Via Kennedy 10 - 40069 Zola Predosa, Bologna (BO)

Tel.: +39 051 6436 000

E-mail: info.hq@maccaferri.com

2. PERSONAL DATA COLLECTED

Platform will process your following personal data:

- email address;
- name;
- surname;
- company;
- role;
- city;
- state/region;
- country;

Furthermore, we inform you that Platform will also process your geolocation which you have indicated during the recording. This personal data is required in order to recommend you our products closer to the project implementation's area. We could use the others data in aggregate form for static platform use purposes.

Registering for this Platform will guarantee you the access to a set of free software online with the purpose of supporting the user to design engineering solutions with Maccaferri products.

Moreover, you can invite, connect and share your project experiences with other users in a professional community. If you receive an invitation via email, you can start your networking experience by registering for the Platform through a specific link in the invitation email. If you are not interested on the project, we assure you that we are not going to process your personal data in any way.

3. PURPOSES OF PROCESSING

a) To fulfil contractual or pre-contractual obligations

Data Controller collects personal data of the user.

i. Legal basis of the processing

Execution of a contract or execution of pre-contractual measures adopted at the request of the data subject.

ii. Data storage period

Data Controller stores your personal data for 12 months from the date of registration or from the date of your last access to our platform.

Prior to the expiration of the storage period, you will receive an email asking you to confirm your continued interest to participate in our Platform. If no direct interaction is received (clicks/opening of the email) for more than 1 month, your personal account will be automatically deleted and the data will be analysed anonymously for market research and to improve our Platform. Anonymization is a data processing technique that removes identifiable personal information, it results in anonymized data that cannot be associated with any one individual. Further, please notice that once Personal Information is deleted, it cannot be retrieved and if you chose to re-subscribe, you will have to provide the information again.

b) To follow up your contact requests

Data provided directly by users may be used to respond to contact requests.

i. Legal basis of the processing

Execution of a contract or execution of pre-contractual measures adopted at the request of the data subject.

ii. Data storage period

Once the execution period of the contact request has elapsed the personal data will be destroyed, deleted or made anonymous in line with the technical procedures for the deletion and backup of personal data.

4. COMPULSORY DATA TRANSFER

Except for certain information required by law, your decision to provide personal data to Data Controller is voluntary. As such, there will be no negative repercussions in the event that you choose to withhold your personal data. However, if you opt to withhold certain information we will be unable to fulfil some or all of the purposes indicated in this privacy policy and you may be unable to use certain tools or systems that require the use of such data.

If you provide Data Controller with the personal data of a third party (such as a representative, prospective customer or sub-contractor), you are responsible for ensuring that said third party is aware of the contents of this privacy policy and, where necessary, has given their consent for the disclosure of the information to Data Controller.

5. RECIPIENTS OF THE DATA

We share your personal data with your consent or to complete any transaction or provide any product you have requested or authorized.

In addition, personal data may be communicated to parties acting as data controllers (such as supervisory bodies and authorities and public organisations authorised to request data) or processed on behalf of the Data Controller by parties appointed as data processors, who are provided with suitable operating instructions. These parties include the following categories:

- Companies belonging to Maccaferri Group that provide products closer to the project implementation's area, working as data processors;
- Companies belonging to Maccaferri Group for administrative and accounting purposes (e.g. purposes connected with internal, administrative, financial and accounting activities);
- natural and/or legal persons providing different services to the Company (e.g. suppliers of services for the management of the Website, such as system outsourcers, companies that provide connectivity services to the Internet, etc.). Such parties may also work as data processors;
- parties and/or public and private entities the data will be communicated to for the purposes of fulfilling or enforcing the fulfillment of specific obligations provided for by laws, regulations and EU legislation. These subjects will operate as autonomous Data Controllers or data processors.

6. TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION

The data may be transferred to non-EU Countries, in particular to:

- a) Extra UE Countries whose data protection level is deemed adequate by the European Commission in accordance with article 45 of the GDPR;
- b) Extra UE Countries other than those referred to in the preceding paragraph a), after signing Standard Contractual Clauses adopted/approved by the European Commission in accordance with article 46, 2, letters c) and d) of the GDPR.

A copy of the above mentioned safeguards can be obtained sending a specific request to the Data Controller, according to the modalities specified in the following paragraph "Data Subject's rights – Complaints to the Supervisory Authorities".

7. SECURITY OF PERSONAL DATA

Your personal data will be processed through automated systems.

Data Controller is committed to protecting the security of your personal data. In accordance to Article 32, paragraph 1, of GDPR, Data Controller implements all the technical and organisational measures to ensure a level of security appropriate to the risk.

8. DATA SUBJECT'S RIGHTS - COMPLAINTS TO THE SUPERVISORY AUTHORITIES

In certain circumstances and according to certain conditions, and except in the case of the exceptions established by applicable law, you are entitled to:

- Request access to your personal data: this right entitles you to know if we possess your personal data and, if so, to obtain information about the data we hold and a copy of said data.
- Request the correction of your personal data: this right allows you to correct your personal data in the case of inaccuracies or omissions.

- Oppose the processing of your personal data: this right authorises you to request that your personal data is no longer processed.
- Request the deletion of your personal data: this right entitles you to request the deletion of your personal data, including in the case that the data is no longer necessary to the intended purposes.
- Request the limitation of the processing of your personal data: this right entitles you to request that your data is only processed in certain circumstances and with your express consent.
- Request the portability of your personal data: this right entitles you to receive a copy (in a structured and commonly used electronic format) of your personal data, or request the transmission of such data to another data controller.

With regard to deceased data subjects, pursuant to Article 2 terdecies of Italian Legislative Decree no. 101/2018, the aforementioned rights may be exercised by anyone with a personal interest or otherwise acting in the interests of the data subject as the agent of the same, or for family reasons worthy of protection.

For any questions regarding the processing of your personal data, please contact Privacy@maccaferri.it.

In the event that, despite our commitment and efforts to protect your personal data, you believe that your rights to the protection of your personal data have been infringed, please contact Privacy@maccaferri.it and we will attempt to resolve any query. This does not affect your right to make a direct complaint to the competent supervisory Authorities or to take legal action before a competent court (in the country in which you live or work or the country in which you believe your rights have been infringed).

9. CONTACT US

Your name, last name, e-mail address and any other Personal Data you share through the “Contact Us” section will be processed according to GDPR and this privacy policy. In order to comply with your request, Data may be transferred to other Companies belonging to Maccaferri Group, residing in non EU-Countries, as described in art. 6, working, as data processors.

After sending your request through the “Contact Us” section, we will contact you exclusively to offer technical support, unless you have authorized us to send you communications for commercial purposes.