

Dear user, Makro Labelling SRL as the personal data controller intends to provide you with the widest possible information on how your personal data is processed and we invite you to carefully read this information notice, provided in accordance with the European Parliament and Council Art. 13 and 14 of Regulation (EU) 2016/679 (hereinafter referred to as "Gdpr"). The information you will find below will allow you to know, even before accessing the various sections of the Website, how the controller will process your personal data, whether directly provided by you or otherwise collected by Makro Labelling Srl (hereinafter, collectively referred to as "Personal Data").



**Data controller** The data controller is Makro Labelling Srl, with head office in Via Giovanna d'Arco n. 9 46044 Goito (MN); telephone 03761872203 contact mail <u>info@makrolabelling.com</u>;



**Data Protection Officer (DPO):** 5.0 DataSolutions Srls can be contacted at the e-mail address dpo@makrolabelling.it or by writing to the Controller for the attention of the DPO.



What Personal Data we process When you browse the Site and/or access certain sections, the computer systems automatically and indirectly administer and/or acquire certain information (e.g. not limited to: browsing data, IP address, server request data, Cookies). Getting in touch through the "Contact us" section of the Site implies the processing of personal data, such as your first name, last name, company, country, e-mail address, telephone number and the data contained in the message you spontaneously send.

**Minors** Persons under 18 years of age should not provide information or Personal Data to Makro Labelling Srl, in which case the controller will not process them.



What is the purpose of the processing of your Personal Data and its legal

**basis** Your Personal Data will be processed without the need for consent, applying the legal basis provided for in 6 of the GDPR, which is further detailed below, for the following purposes:

1. Allowing navigation on the website, operations relating to and/or connected with the provision of services by the data controller in the context of navigation on the website, such as the provision of services requested by the Data Subject during

navigation on the website, including the collection, storage and processing of data for the purposes of operational and technical management and anonymised statistics (Art.6 (f) Gdpr).

- 2. Responding to your request for information or contact; (pre-contractual measures Art.6 (1)(b) Gdpr).
- 3. Management and execution of legal requirements (security of IT communications, etc. Art.6 (1)(c) Gdpr).
- 4. Exercising the controller's rights with particular reference to the right to defence in court (legitimate interest of the holder Art.6 (1)(f) Gdpr).
- 5. Sending you commercial communications by e-mail relating to products related to those previously purchased (soft-spam Art. 6 (1)(f) Gdpr).



**Nature of the provision of personal data** Since the provision of the data subject's personal data for the purposes set out in points 1) to 5), while always optional, is necessary for the maintenance and provision of all the services connected with the navigation of the website, failure to provide such data will make it impossible to provide the specific services requested by the data subject.



Personal Data disclosure Without prejudice to disclosures made to public authorities in fulfilment of legal obligations, in addition to the data controller, your personal data may be disclosed to:

- Employees and collaborators and suppliers of services necessary for the proper functioning of the Site and its functions/services (by way of example but not limited to, ICT service providers, hosting service providers, suppliers of IT platforms and applications).
- Professional third parties for the management, marketing, and sales assistance of our products (by way of example but not limited to agents who will contact you if you express interest in acquiring our products)

These recipients act as authorised data processors, autonomous data controllers or data processors duly instructed and trained. Personal data will not be passed on to third parties and are not subject to dissemination.

Your personal data are not processed outside the European area; should the need arise, the controller will do so in compliance with the GDPR in order to guarantee the protection of the rights and freedoms of individuals.

**How we process your Personal Data** The processing of your Personal Data may include various operations carried out by electronic, automated and/or paper-based means. The tools and supports used in carrying out the processing activities are suitable to guarantee the security, integrity and confidentiality of the data, therefore in carrying out the processing activities, Makro Labelling Srl undertakes to ensure the accuracy and updating of the processed data, and promptly receive any corrections and/or additions requested by the Data Subject; adopt appropriate security measures to ensure adequate data protection, in view of the potential impact that the processing entails on the fundamental

rights and freedoms of the Data Subject; ensure the compliance of processing operations with the applicable provisions of law.



**Retention of Personal Data** In order to ensure compliance with the principles of necessity and proportionality of processing, the Controller has identified different retention periods for Personal Data in relation to the individual purposes pursued:

- 1. For the purpose of managing and responding to your requests in relation to Makro Labelling Srl's products and initiatives, ("Contacts" section of the Site), your Personal Data will be kept for the time strictly necessary to process your request.
- 2. For the purpose of managing and executing contracts and the fulfilment of legal obligations, your Personal Data will be kept for the time required by mandatory regulations.
- 3. For the purpose of handling disputes and litigation, your Personal Data will be kept for the time strictly necessary for this purpose and, in any event, not beyond the applicable statute of limitations.
- 4. Soft-spam 30 days from the end of the contract unless objected to.
- 1. Data collected via cookies will be retained for the time periods set out in the relevant notice\*.

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Data subject rights The data subject may assert his/her rights,

recognised by Articles 12 to 22 of the GDPR, such as: the right to be informed in advance of the processing of one's personal data; Right of access: to obtain confirmation as to whether or not personal data is being processed and, if so, to obtain access to personal data and further information on the origin, purposes, categories of data processed, recipients of communication and/or transfer of data, etc. Right of rectification: the right to obtain from the data controller the rectification of inaccurate personal data without undue delay, as well as the integration of incomplete personal data, also by providing a supplementary declaration. Right to cancellation: where applicable, the right to obtain the erasure of personal data without undue delay if the personal data are no longer necessary for the purposes of the processing; the consent on which the processing is based has been withdrawn and there is no other legal basis for the processing; the personal data have been processed unlawfully; the personal data must be erased in order to comply with a legal obligation. Right to object to processing: the right to object at any time to the processing of personal data that have as their legal basis a legitimate interest of Makro Labelling Srl. Right to limitation of processing: right to obtain from the controller the restriction of processing, in cases where the accuracy of personal data is contested (for the period necessary for Makro Labelling Srl to verify the accuracy of such personal data), if the processing is unlawful and the Data Subject has objected to the processing, if the personal data are necessary to the Data Subject for the establishment, exercise or defence of a legal claim, if following the objection to the processing the Data Subject is awaiting verification as to whether or not a legitimate interest of the Controller prevails.



Right to lodge a complaint with a supervisory authority: without

prejudice to any other administrative or judicial remedy, a Data Subject who considers that the processing concerning him/her violates the GDPR has the right to lodge a complaint with a supervisory authority.

In order to exercise his/her rights under the GDPR, the Data Subject may:

- forward your requests to Makro Labelling Srl by e-mail to: privacy@makrolabelling.it
- 2. write to the Controller at the following address: Makro Labelling Srl -Ufficio Privacy-via Santa Giovanna D'Arco n. 9, 46044-Goito (MN).

**Updating of information:** We invite you to periodically check the section of the Site within which this Policy is hosted, and to consult the most recent Policy text, which is effective only with reference to this site, reachable at <a href="https://www.makrolabelling.com/en-ww/privacy-policy.aspx">https://www.makrolabelling.com/en-ww/privacy-policy.aspx</a> but not for other and different portals or websites that may be consulted through the present links or sharing tools for which the Controller is in no way responsible. For more information on the processing of personal data that these sites carry out, we advise you to consult their privacy policies.

## Other information to the data subject

**Social buttons** The Data Controller uses social buttons (digital buttons) on the Site, i.e. direct links to social network platforms (Facebook, Instagram, LinKedin) configured in each individual "button". By clicking on such links, you will be able to interact directly with the accounts (social pages) of the Controller. The Social Network operators to which the buttons refer are autonomous data controllers. More information on the individual privacy policies of the social network platforms and on how to manage and deactivate the relevant cookies can be found in the reference social network platforms.

**Google Maps** Makro Labelling has made the Google Maps service available on its site to make it easier for you to find our locations and to reach us more easily, but it has no power over the data processing that Google carries out in offering its service, for more information you can consult its privacy policy.

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