Privacy Policy

Information about personal data processing

Introduction

The protection of personal data is a fundamental value in our business activity. In this document we provide all information you may need to understand how we protect your privacy, and to have control on how we use your data.

This information notice is about the processing of your personal data that is made through our website https://www.microntel.com/ (the "Website") or that is otherwise made in connection with the purchase and use of Microntel's products and services, or when you contact us to request information.

We process your data in compliance with Regulation (EU) No. 2016/679 (General Data Protection Regulation, "GDPR") and this information is provided pursuant to art.13 of the GDPR.

In this policy we give a clear and detailed description of:

- Who we are, and how to contact us
- What types of personal data we process
- Why we collect your personal data and how long we retain them
- How and with whom we share your data
- How we process your personal data
- What are your rights, and how you can exercise them
- Amendments and updates
- Contacts for privacy matters

Who we are, and how to contanct us

In this section we specify who you should address if you wish to exercise your rights.

- Controller
- Data Protection Officer

Controller

Means the natural or legal person who determines why and how your personal data are processed and arranges the organizational and security measures to protect your privacy. Microntel S.p.A. is the Controller and its contact details are:

Controller

Microntel S.p.A

Via G. Reiss Romoli, 147 - 10148 Torino (TO)

Privacy: privacy@microntel.com

Please remember to include your name, e-mail/postal address, and/or telephone number so that your request can be handled correctly.

Data Protection Officer

Microntel, part of TeamSystem Group, has designated a Data Protection Officer (DPO): the DPO has the task of monitoring the compliance with regulations on the processing of personal data and of responding to your requests for clarification about how we process your data. Furthermore, the DPO has been entrusted by the group with the task of responding to the users' requests concerning the exercise of their right of access and of other rights as specified in the GDPR. The DPO may be reached in writing at the address of the TeamSystem's offices or by e-mail at the following address:

Data Protection Officer

TeamSystem S.p.A. Via Sandro Pertini, 88 Pesaro

EMAIL: dpo@teamsystem.com

Please remember to include your name, e-mail/postal address, and/or telephone number so that your request can be handled correctly.

What types of personal data we process

Personal data means any information enabling, directly or indirectly, your identification. We collect and use your personal data for the purpose of entering into, and performing, your agreement with Microntel. We further collect and use your personal data when you visit, search, request or use any Microntel's service and/or product (including those available on this Website).

Categories of personal data we collect:

★ Navigation data

Means data relating to the internet connection, IP address¹, domain names and to other parameters relating to the browser and operating system of the users.

¹ The IP address is the equivalent of the postal address but referred to your device (pc, mobile, tablet). In other words, it is a unique address identifying a specific device

★ Identifying contact and access details

Means data such as name, surname, username, e-mail address, postal address, telephone number, TeamSystem ID and password, image of the profile (if you set one).

Why we collect your personal data and how long we retain them

In this section we illustrate why we use your data, i.e., which are the purposes of our processing activity.

We also specify if you are required to provide your data, what happens if you decide not to provide your data to us, and how long we retain your data.

We process your data for the following purposes:

Finalità di funzionamento e pre-contrattuali

1. Website operations and pre-contractual purposes

IN short

★ Is your consent required to process your data? No, your consent is not required.

★ What is the legal basis for processing your data?

The processing is necessary to allow navigation on the website and/or to manage your possible requests for information relating to the products and services, via the contact form on the website, pursuant to and for the purposes of Article 6 (1) (b) of the GDPR. In this case, the data collected are those specified in the previous paragraph.

★ How long do we retain your data?

For as long as the requested services are supplied and for the following 30 days. This is without prejudice to retention for longer periods insofar as such retention is necessary in the framework of pending litigation, or for responding to a request made by a competent authority, or pursuant to the applicable law.

Please also find a more detailed description of the above-mentioned

a. Enabling navigation on the Website

Process contact requests for the products and/or services offered by Microntel SpA to provide further information on the service/product you have chosen, via the Site through remote communication tools, such as the specific contact form present there, where you can provide, for example, name, e-mail as well as any other information via the box for releasing the optional message at the bottom.

How and whith whom we share your data

We may disclose your data to other person or entities carrying out service activities that are integral and necessary for the provision of our products or services. When sharing your data, we comply with the principle of data minimization established in the GDPR.

The recipients of your data shall carry out the processing by acting as independent controllers, as processors or as other processors in charge of processing operations. If you wish to receive the list of all processors carrying out processing operations, please contact us at the address: privacy@microntel.com.

We disclose your data to the following recipients:

- **a.** Third-party providers of assistance and consulting services in the field of (without limitation) technology and administration.
- **b.** Companies of the TeamSystem group.
- **c.** Entities and public authorities whose right to receive personal data is expressly granted by law, regulations or by an act issued by a competent authority.

★Do we transfer personal data abroad

Personal data may be freely transferred within the European Union. Should Microntel need to transfer personal data, for the specified purposes, outside the European Union to countries not considered adequate by the European Commission (e.g., United States), Microntel shall take the necessary measures to protect the personal data.

We will act in compliance with the safeguards required by the law, pursuant to the applicable regulations and in particular to article 45 and 46 of the GDPR.

If you wish to have further information about the existing safeguards, and to receive a copy of such safeguards, please contact the Data Protection Officer at the address: dpo@teamsystem.com.

How we process your personal data

Microntel carries out the processing of your personal data by electronic and manual systems, according to the principles of fairness, honesty, and transparency, and protecting your privacy by the implementation of technical and organisational measures appropriate to ensure an adequate level of security.

The processing operations are performed at the Microntel's premises and/or at the premises of the independent Processors who carry out the processing on behalf of Microntel.

For more information about cookies and other tracking technologies used on the website, and the following processing of your Navigation Data, please consult our cookie policy.

What are your rights, and how you can exercise them

You have control of your own personal data. Here you can find a list of your rights with regard to the processing of your personal data:

★ Right of access

You are entitled to obtain confirmation as to the existence of personal data relating to you, and to have access to the relevant contents.

★ Right to rectification

You are entitled to obtain the updating, amendment and/or rectification of your personal data.

★ Right to be forgotten and to restriction of processing

You are entitled to obtain the erasure, or the restriction of processing, of personal data that are unlawfully processed, including where they do no longer require retention in relation to the purposes for which they have been collected or are otherwise processed.

This is without prejudice to any overriding public interest, or legal obligation to retain the data concerned.

★ Right to object

You are entitled to object to the processing.

This is without prejudice to the case when there are overriding legitimate grounds allowing Microntel to continue the processing.

★ Right to withdraw consent

You are entitled to withdraw your consent, if previously given, to marketing activities.

★ Right to lodge a complaint

You are entitled to lodge a complaint with a supervisory authority in the Member State where you have your habitual residence, where you work, or where the alleged infringement has occurred. In Italy, the competent supervisory authority is the Garante per la protezione dei dati personali.

This is without prejudice to any other administrative or judicial remedy.

★ Right to data portability

You are entitled to receive a copy in electronic form of the personal data relating to vou.

You are entitled to transfer such data to another service provider, where Microntel is processing the personal data based on your consent or based on the necessity to carry out the processing for providing services upon your request, and where the processing is carried out by automated means.

If you wish to exercise the above-mentioned rights with regard to the protection of personal data you may address, at any time and free of charge, to the Data Protection Officer by sending an e-mail at the following address: dpo@teamsystem.com.

When you contact us, please remember to include your name, e-mail address, postal address, and/or telephone number so that your request can be handled correctly.

★ What happens if you die

In case of decease, article 2-terdecies of the Privacy Code shall apply, stating that these rights relating to your personal data can be exercised by a data subject who has an interest in your protection, or acts on your behalf as an agent, or for family reasons worthy of protection.

You may expressly forbid that the above-mentioned representatives exercise one or more of the rights above, by sending a written statement to the Controller, at the contact details specified in the section "Who we are, and how to contact us".

You shall be entitled to successively withdraw or amend this statement according to the same formalities.

Amendments and updates

We may amend this policy, also as a consequence of amendments in the applicable law. We will provide prior notice to you in case of any amendments to this privacy policy. The updated policy will be available on the Website at: Privacy Policy - Microntel.

Contacts for privacy matters

Should you have questions or requests about this privacy policy, please contact the Controller by using the following contact details:

Controller

Microntel S.p.A Via G. Reiss Romoli, 147 - 10148 Torino (TO) Privacy <u>privacy@microntel.com</u>

Please remember to include your name, e-mail/postal address, and/or telephone number so that your request can be handled correctly.