

Subject: this informative is intended to inform you about the processing of your personal data as per Legislative Decree 101/2018 (Personal Data Protection Code) and EU Regulation No. 679/2016 - GDPR

We would like to inform you that, for a proper management of the existing working relationship with you, **MITA Group S.p.A.**, under the agreement of co-ownership of **Mita Group S.p.A. - Mita Cooling Technologies S.r.l. - Mita Immobiliare S.r.l. - Frigofluid S.r.l.**, is required to process your personal data and possibly your family members, classified as personal data according to the mentioned regulations.

These regulations impose that the personal data processors inform the data subject about the purposes of the processing and certain qualifying elements of the processing itself. In compliance with current regulation, therefore, this informative outline the main features of the processing of your data handled by us.

1. Nature of the data processed and purpose of processing

The data we acquire are mainly personal, financial, and employment-related (such as name, surname, residence, date and place of birth, telephone and telematics contact details, bank details, job position, production data, salary received, education, educational and work experiences, images). These can be collected at the time of establishment of the employment relationship, during its course, and sometimes after its termination.

Where necessary for compliance with the law or collective agreements, the data collected may also concern members of your family and/or cohabitants.

Your data will be processed:

- for the administrative and accounting management of your employment relationship and for the fulfilment of the related obligations provided by law, collective agreements and your individual contract obligations;
- for organizing work activities, including managing physical and IT access to organization premises and systems;
- for compliance with legal regulations concerning workplace safety and crime prevention (anti-corruption, anti-mafia, Legislative Decree 231/2001);
- for protecting company security and assets, such as recording and analysing access to IT infrastructure, video surveillance, and badges;
- if necessary, to ascertain, exercise, and/or defend the Data Controller's rights in court.

2. Legal bases for processing

The Organization processes employees' personal data based on the following legal bases:

- the necessity of processing to fulfil the working employment contract with the data subject;

- the necessity to comply with legal obligations (such as, workplace safety regulations, accounting record-keeping requirements, tax obligations, etc.);
- the necessity to pursue the Organization's legitimate interests (managing not just the beginning of the employment relationship, but the interest in protecting its working rights, and the interest in protecting company security and assets).

3. Processed data special categories

Among the acquired information, there are also so-called special data (for example, data suitable to reveal your health status or your membership in a trade union). The processing of your special data is justified as it is necessary to fulfil obligations and exercise rights (of the company or the concerned worker) in the field of labour law and social security.

4. Data processing methods

The processing will be carried out with appropriate methods and procedures, including IT and telematic tools, with the aim of previous points, in such a way as to ensure the confidentiality and security of personal data. Your data may be known by the staff of the personnel and/or IT management and information systems structures, as well as by the personnel of other structures, offices, or bodies for tasks within their competence related to your employment management.

5. Obligation and discretion to confer data

Without prejudice to the autonomy of the data subject, the possible refusal to provide personal data partially or totally obstruct the employment relationship with the data subject, the obligations provided by laws, regulations, or community norms, or by provisions issued by law assigned Authorities OR by supervisory and control bodies.

6. Data communication and dissemination

Your personal data is not subject to dissemination. Only where necessary for the tasks or activities entrusted to you, they may also be subject to information flows towards suppliers, consultants, clients and/or customers/ users. For the purposes outlined in point 1 and within the relevant limits, your personal data, as well as that of your family members, may be shared with the following categories of recipients:

- to the administrations and public bodies competent for compliance with regulations in the field of labour, social security, assistance, taxation, accounting, hygiene and safety, etc. ;
- to competent doctors responsible for carrying out the activities provided for by the regulations on health and safety at work and medical consultants responsible for other occupational health prevention activities;
- to trade union representatives, in compliance with specific obligations deriving from the National Collective Labor Agreement (CCNL) and the Company Collective Agreement (CIA) or other agreements;
- to Pension Funds and Assistance and/or Supplementary Pension Funds (if enrolled);
- to trade union or patronage associations (if enrolled);

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Sede Legale: Via Felice Casati 1/A – 20214 Milano (MI) – Italy
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- to companies, associations, and external collaborators for services and consultancy (payroll offices, accountants, lawyers, etc.);
- to Banks and Credit Institutions for the accreditation of economic competencies;
- to IT, telematic, health, archiving, or other technical/organizational service companies;
- to all other subjects to whom your personal data must be communicated from time to time in relation to the performance of your work duties.

7. Rights of the data subject

The legislation on the protection of personal data (art. 12-22 of EU Regulation 679/2016) guarantees the right to be informed about the processing of data and the right to access the same data at any time and request its update, integration, and correction. If the conditions provided for by law are met, the data subject may also claim the right to erasure of data, restriction of processing, data portability, opposition to processing, and not to be subject to decisions based solely on automated processing. If the processing of personal data is based on the consent of the data subject, they have the right to withdraw the consent given.

For the exercise of your rights and more detailed information on data processing, you can contact the Organization by writing to the following e-mail: gdpr.mita@mitagroup.it. If the data subject considers that his rights have been infringed, he may protect himself by lodging a complaint with the Guarantor for the protection of personal data.

8. Data retention

Your personal data will be retained for the duration necessary to fulfill the purposes outlined in this notice. After these purposes have been met, the data will be kept until the expiration of any rights arising from the legal and factual relationships between the parties, directly or indirectly related to these purposes.

The data will be processed for the entire duration of the contractual relationship and subsequently, as needed, to comply with legal obligations and for administrative purposes (10 years).

The retention period for the aforementioned data may be extended, only as strictly necessary for the indicated purposes, in cases where crimes or security and company asset violations are detected.

9. Data Controller

The Data Controller is MITA Group Spa, VAT number 09780430154, with its registered office at Via Felice Casati 1/a - 20124 Milan, email address: gdpr.mita@mitagroup.it.

The Data Controller may process the data directly through its authorized employees or by using external collaborators, who will then act as Data Processors. An updated list of Data Processors is available from the Data Controller upon request.

To acknowledge and communicate your data, please return this form, duly completed and signed, to the Personnel Office.