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PRIVACY POLICY- personal data processing Leg.Decree 196/2003 – PROCESSING AND USE OF PERSONAL DATA REQUESTED AND/OR ACQUIRED DURING THE PROCESS OF COMPANY ACTIVITIES.

In compliance with Section 13 d.lgs n.196/03 "Personal data protection code"

the Company M&M international Srl, registered office in Milan -Italy , Via Manzoni n°.43, which is the controller of the personal data processing , shares the following information to Subjects concerned with processing of their personal data, common and/or sensitive, collected by reason of existing contractual relationship, required pre-contractual notice or acquired in other ways during the process of company activities , included therefore data collected from users ("Users") of M&M website ("the Site") either when they register to use the Site, either during the course of their use of the Site, either when M&M requests further information from Users from time to time following on from registration :

1- the data processing will be performed : a) for purpose of exercising any rights and fulfilling any duty deriving from the contractual agreement between our Companies and/or any other duty required by Italian and UE laws and regulation in force; b) in particular , for purpose of fulfilling any economic, financial, legal, fiscal, insurance, commercial assignment related to the management of the contractual relationship and/or to the costing assessment in compliance with accounting regulations and Spirax Sarco Group accounting and management procedures ; c) for statistic, commercial , marketing and credit safeguard purposes ;

2. the data processing will be handled in compliance with Section 11 Leg. decree 196/2003 , and it will include any operation or set of operations described by Section 4 .1.a. Leg. decree 196/2003, included the communication of the data to the subject indicated at point 5 below, and their dissemination in the terms described at point 7. The data processing is carried out with or without the help of electronic or automated means, and it is managed by persons in charge of the processing; the data will be stored and filed on paper and/or using every automatic tool and support – optical/information/ magnetic – capable of storing and recording ; the data processing with manual means with collection of the data on specific books and/or file cards which will be conserved into traditional archives;

3. Providing the requested data is obligatory when required for fulfilling duties deriving from laws or regulations, and voluntary when required for fulfilling rights and duties deriving from contractual agreements ,but necessary for the purposes indicated at point 1 ;

4. Any refusal to provide the data and/or to allow the subsequent processing may result in the undersigned M&M being unable , partially or in full, to reach the purposes indicated at point 1 ;

5. the data will be communicated to:

- Public Authorities or Administrations , within the limits and criteria established by laws and regulations;
- financial and/or commercial and/or bank companies or legal consultants for credit safeguard purposes;
- banks and financial or commercial companies in charge of collecting or issuing payments;
- entities in charge of supplying administrative/accounting/fiscal support for managing related services;

- lawyers and legal consultants for purposes of safeguard of Company's interests related to the contractual relationship , and for the evaluation of possible liabilities having legal significances;
 - auditors and statutory auditors for purposes of auditing and checking of accounts related to the contractual relationship , and for the evaluation of possible liabilities having economic significances;
 - insurance companies and brokers for managing of the company's risk policies and their crosscheck, included credit assurance ;
 - companies and consultants in charge of managing and maintenance of the IT system and network;
 - Spirax Sarco Group companies (located in or outside the territory of EU) for satisfying all requirements of corporate policies and internal check procedures and / or to enable them to provide the Subjects with information about products and services which they believe would be of interest ;
 - consultant and entities in charge of supplying support for quality assurance, technical productive/logistic/ environmental consultancy , for purposes connected to their charges;
 - Company's customers and suppliers, located in or outside EU , only for purposes connected to the managing, organization, and execution of activities connected and/or related to contractual relationships and agreements;
6. data can be disclosed to the following processors or persons in charge of the processing :
Company ' s management and employees of the administration /accounting/customer services/commercial/ purchasing/ production/logistic/ technical/quality departments ;
7. the data can be transferred to third countries, either inside and outside the EU ; an updated list of the extra- European countries is available by the processor indicated at the following point 9.; the data will be not disseminated;
8. every data subject is entitled to exercise the rights granted by Section.7 of Leg .Decree 196/2003 (full text herewith enclosed)
9. M&M INTERNATIONAL is the controller of the data processing, in person of its Legal Representative " pro- tempore " ; processor of the data processing is the Administrative and Finance Manager " pro-tempore" of the Company , residing at the administrative offices in Orio al Serio (BG)- I , Via Portico n.17, for the sole purpose of this assignment ; any concerned subject is entitled to refer to the a.m. processor for the exercise of the rights indicated at Section 7 Leg. Decree 196/2003, by emailing at administration@mminternational.net .

M&M INTERNATIONAL SRL

Leg. Decree 196/2003 – Section 7 (Right to access personal data and other rights)

1. *A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him exist, regardless of their being already recorded, and communication of such data in intelligible form.*
2. *A data subject shall have the right to be informed :*
 - a) *of the source of the personal data;*
 - b) *of the purpose and methods of the processing;*
 - c) *of the logic applied to the processing , if the latter is carried out with the help of electronic means;*
 - d) *of the identification data concerning data controller, data processors and the representative designated as per Section 5 (2) ;*
 - e) *of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of their processing .*
3. *A data subject shall have the right to obtain :*
 - a) *updating, rectification or, where interested therein, integration of the data;*
 - b) *erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed ;*
 - c) *certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated , unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.*
4. *A data subject shall have the right to object , in whole or in part ,*
 - a) *on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;*
 - b) *to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.*

CONSENT TO OUR USE

If you object to the use by M&M International of your User Data in the manner described above , please inform us by e-mail at administration@mminternational.net

ACCEPTANCE OF TERMS AND CONDITIONS OF M&M PRIVACY POLICY

By using the M&M website to contact us you acknowledge that you have read the terms and conditions of our Privacy Policy and that you agree to M&M International use of your User Data in the terms and for the purposes set out above. That Privacy Policy may be amended by M&M International at any time . M&M International will notify you of changes through the website .