

English version

Privacy notice

This privacy notice informs you about how MCC Camaiore Srl (MCC) collect, use, disclose, and store personal information in our role as a controller of personal information when you interact or use our website, including when you download materials from it, request to subscribe the newsletter, or ask us to contact you.

As a company we are committed to safeguarding your privacy with the utmost care and, in compliance with the law, we have developed this new model of Privacy Notice using simple and direct language to provide you with information in a transparent and clear way on how your personal data are processed when you visit or use our website.

PLEASE READ THIS PRIVACY NOTICE CAREFULLY AS IT DESCRIBES YOUR RIGHTS, RESPONSIBILITIES, AND LIABILITIES. BY ACCESSING OR USING OUR WEBSITE OR OTHERWISE PROVIDING US WITH PERSONAL INFORMATION, YOU ARE CONSENTING TO THE TERMS OF THIS PRIVACY NOTICE AND OUR TERMS OF USE AND ANY APPLICABLE COOKIE POLICY ON A WEBSITE.

Updates to this privacy notice: MCC may update this privacy notice. Please check this privacy notice periodically to verify for any updates. Any updates to this privacy notice will become effective upon their posting here on the MCC website.

Last updated Nov 20, 2024.

IMPORTANT: this privacy notice applies only to this website. For our privacy obligations in relation to other scenarios, please refer to the applicable privacy notices respectively.

Methods of processing and sources of information: we collect and manage your data electronically and automatically using online tools and company systems. We collect personal information directly from you when you use our services, through automated means when you are using the website, and from third parties. More specifically, we collect personal information from the following sources:

- **First Party / Direct Collection.** We collect personal information directly from you when you use our services (e.g., registering accounts, completing purchases) or whenever you directly engage with us, such as when you visit our offices or premises or otherwise contact us.
- **Automated Collection.** We may collect information and data, such as usage data and cookies, through automated means when you use the website (see “Website” section above).
- **Third-Party Sources.** We collect personal information from third parties, such as publicly available databases, social networking providers, advertising companies, our service providers, and third-party references.

For purposes of this Privacy Notice, the term “**personal information**” or “**personal data**” means any information that, alone or in conjunction with other information or data, identifies

or is linked to a particular individual or household and that is subject to, or otherwise afforded protection under, a data protection law, statute, or regulation. The term “personal information” does not include anonymized or de-identified data that is not attributable to a particular individual or household and that is not otherwise subject to a data protection law, statute, or regulation. MCC may anonymize or de-identify personal information, and such data is not subject to this Privacy Notice, and MCC may use such data for any purpose.

8. Who are we?



The data controller of personal data processed as described in this privacy notice is:

MCC Camaiole Srl whose registered address is Via dei Metalmeccanici S.N.C. Frazione Capezzano Pianore, 55041 Camaiole (LU).



Data Protection Officer (DPO): MCC has appointed an internal data protection officer for you to contact if you have any questions or concerns about MCC’s personal data policies or practices. If you would like to exercise your privacy rights, please direct your query to MCC’s data protection officer:

Data Protection Officer
MCC Camaiole Srl
Via dei Metalmeccanici S.N.C.
Frazione Capezzano Pianore
55041 Camaiole (LU)
email: mcc_dpo@mcclabel.com

9. What personal data do we collect?



When you (as a data subject) visit or browse our website, we may collect the following categories of personal data about you:

- contact information (e.g., name, surname, email address, username, password, country, etc.).
- professional data (e.g., company and industry).
- technical data (e.g., IP address, type of browser/ device used, etc.); and
- any personal data contained in any correspondence you send to us.

10. Why do we use your personal data?

The below information outlines the purposes that we process your personal data for and, for each purpose, the legal basis for the processing operation in question:

e. Subscribe to Newsletter

Purpose and legal basis: we will use the user contact details to send information and marketing communications on events, news, activities and promotions. The processing of your personal data is only carried out based on your consent.



Data necessary for the purposes of the processing: you are not obliged to provide the personal data requested by us, but without it we will not be able to send you the newsletter.

f. Contact us

Purpose and legal basis: respond to requests regarding the products or services offered by MCC and any requests for offers, collaboration or support submitted through the contact forms. The processing of your personal data is only carried out based on your consent.

Data necessary for the purposes of the processing: you are not obliged to provide the personal data requested by us, but without it we will not be able to respond to your requests.

g. Improving your website experience

Purpose and legal basis: in order to measure technical diagnostics, guarantee and improve the web browsing experience and the security of the web infrastructure including the personal data managed. Some personal data are automatically collected, the transmission of which is implicit in the use of internet communication protocols. We process this data on the basis of our legitimate interest.

Additional purposes and legal basis: to access parts of the website or for statistical purposes or to make the browsing experience more enjoyable and more efficient in the future, trying to evaluate user behaviour and modify the offer of content and advertising according to their behaviour, we collect through cookies the personal data of the users that are visiting the website. The legal basis for the processing, depending on the purpose, will be legitimate interest or consent. (The cookies used on our websites keep the user data from the minimum persistence time of the session of users' connection to a maximum of several months for advertising cookies. You can find further information on the processing of cookie data in our [cookie policy](#)).

Data necessary for the purposes of the processing: the collection of your data is mandatory while browsing our website to allow the correct technical and functional delivery of the website. The consent for collecting your data for the advertising and analytics cookies is instead optional and will not compromise the surfing on the website.

h. Compliance with legal obligations

Purpose and legal basis: to comply with Laws, rights and requests from Public Authorities, MCC will process your personal data in the event of any requests for the investigation of crimes by the Judicial Authorities as well as to assert or defend in court a right of MCC.

11. Who do we share your personal data with?

Persons authorized to process data: the people in charge of processing your data operate in the context of Marketing and Sales' operations and the technical support service.

External data processors: we may also use companies that provide services in our name or on our behalf, such as the supplier who assists us in defining and carrying out marketing and/or communication activities and, the service providers or companies of the MCC group who oversee routine maintenance and operations of our website. The updated list of data

processors is available by writing to the company at the address provided above and we will get back to you in due time.

Data transfer to other data controllers: based on your country, or your specific request we could share your data with the appropriate MCC group companies.

12. Do we transfer your personal data outside the EU/EEA?



Data transmission outside the European Union: Information we collect about you will be processed in the United States as our systems are located in US.

The United States has not sought nor received a finding of “adequacy” from the European Union (EU) under Article 45 of the GDPR. Pursuant to Article 46 of the GDPR, MCC is providing for appropriate safeguards by entering into binding standard data protection clauses, enforceable by European data subjects.

MCC complies with all applicable legal requirements to safeguard your personal data transferred outside of the EU.

To share data within our corporate group, we have entered into specific contracts approved for use in the US, such as the [EU standard contractual clauses](#), to ensure that an equivalent level of data protection applies to your personal data even where EU data protection laws do not directly apply.

13. How long do we store your data?



The data collected will be kept for a period of time not exceeding the achievement of the purposes for which they are processed or on the basis of the deadlines set by law. The verification of the obsolescence of the data stored in relation to the purposes for which they were collected is carried out periodically.

For the purposes of processing listed under 3.a (subscribing to our newsletter), you can request to unsubscribe from the sending of the newsletter through the appropriate option present in the footer of the email. Similarly, for 3.b (contacting us through our online webforms), we will process your data until we have complied with your request, or until the withdrawal of your consent. For the purposes of 3.c (website improvement and security), the navigation data of website visitors do not persist on our logging systems and security infrastructures for more than 180 days, except for any need for the investigation of crimes by the judicial authorities.

Conservation terms: at the end of the conservation terms the data will be deleted or made anonymous in compliance with company policies.

14. What rights do you have?



- Right to access;
- Right to rectification;

- Right to erasure;
- Right to data portability;
- Right to restriction of processing;
- Right to object;
- Right to withdraw consent.

This Privacy Notice is intended to provide you with information about what personal data the MCC collects about you and how it is used.

If you wish to confirm that the MCC is processing your personal data, or to have access to the personal data the MCC may have about you, modify, oppose and/or limit the processing of your data, as well as request its deletion or portability, and withdraw your consent, please contact us directly via post at the address provided above and we will get back to you in due time. To the extent permitted by law, we will need to verify your identity (or the identity of your agent) and ensure the authenticity of your request.



Complaints. For questions or complaints concerning the processing of your personal information, you can email MCC's data protection officer at mcc_dpo@mcclabel.com . Alternatively, if you are located in the EU/EEA, you can also have recourse to the European Data Protection Supervisor or with your nation's data protection authority.

Personal data of minors: This website is not intended for use by individuals under the age of 18. We do not knowingly collect or solicit personal information from anyone under the age of 18. If you are under 18, please do not attempt to register for the services or send any personal information about yourself to us. If we learn that we have collected personal information from a minor under age 18, we will delete that information as quickly as possible.

Social Media: we may engage with you on various social media platforms (e.g., Facebook, Twitter, LinkedIn). If you contact us on a social media platform for customer support or for other reasons, we may contact you via the social media's direct message tools. Certain social media platforms may also automatically provide us with your personal information. The information we receive will depend on the terms that govern your use of the social media platform(s) and any privacy settings you may have set. The website may include social media features and widgets (e.g., the "Facebook Like" button, the "Share This" button) or interactive mini-programs that run on the website. These features may collect your IP address and which website page you are accessing and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the website. Your interactions with these features are governed by the privacy statement of the relevant social media platform that provides them.

Links to Other Websites; Your Direct Third-Party Disclosures: as a resource to you, the website may include links to third-party websites or provide you the opportunity to disclose information directly to third parties (e.g., credit card processors). Our Privacy Notice does not apply to such third-party websites or organizations. You assume all privacy, security, and other risks associated with providing any data, including personal information, to third parties via the our services. For a description of the privacy protections associated with providing



information to third parties, you should refer to the privacy statements, if any, provided by those third parties.

Security: We seek to protect the security of your personal information and use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. HOWEVER, NO INFORMATION SYSTEM CAN BE FULLY SECURE, AND WE CANNOT GUARANTEE THE ABSOLUTE SECURITY OF YOUR PERSONAL INFORMATION. MOREOVER, WE ARE NOT RESPONSIBLE FOR THE SECURITY OF PERSONAL INFORMATION YOU TRANSMIT TO OUR SITE AND/OR SERVICES OVER NETWORKS THAT WE DO NOT CONTROL, INCLUDING THE INTERNET AND WIRELESS NETWORKS, AND YOU PROVIDE US WITH ANY PERSONAL INFORMATION AND DATA AT YOUR OWN RISK. TO THE EXTENT PERMITTED BY LAW, WE SHALL NOT BE LIABLE OR OTHERWISE RESPONSIBLE FOR ANY DATA INCIDENT OR EVENT THAT MAY COMPROMISE THE CONFIDENTIALITY, INTEGRITY, OR SECURITY OF YOUR PERSONAL INFORMATION CAUSED BY A THIRD PARTY. The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a username and password to access our services, you are responsible for maintaining the security and confidentiality of those credentials and not revealing them to others. You must contact us immediately (and in any event within twenty-four (24) hours) if you have reason to believe that your username or password to our services has been compromised. You acknowledge and agree that we may contact you via email or other electronic communications in the event we are legally required to notify you of a data security incident or event related to your data.

Email Marketing and Your Rights. You have the right to opt out of receiving email marketing communications from us. Generally, the email marketing communications that you receive from us will provide you an option to “unsubscribe” from receiving future email marketing communications from us. You may also unsubscribe from such email marketing by contacting us at mcc_dpo@mcclabel.com. You hereby agree to immediately notify MCC, in writing, in the event you no longer own, license, or use an email address to which you subscribed to receive email marketing from us.

Do-Not-Track Signals. some web browsers may transmit “do-not-track” signals to the website with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they are even aware of them. Unless otherwise required by law, we currently do not take action in response to these signals.

Persons with Disabilities. MCC strives to ensure that every person has access to information related to our services, including this Privacy Notice. Please contact us if you would like this Privacy Notice provided in an alternative format, and we will seek to meet your needs.

Employment Applications and Talent Management. As part of our recruitment and talent management process, we collect personal information with respect to individuals who are interested in working for us. In this context, we collect employment and application data, such as the following: contact information (e.g., name, title, residential or postal address, telephone number, and personal email address); information in a curriculum vitae, resumé, cover letter, or similar documentation; details regarding the type of employment sought,

willingness to relocate, job compensation and benefit preferences; health data (e.g., medical conditions); information related to your background, education, criminal record, credit history and similar data; information provided about or by your references or other third parties related to your employment history, skills, qualifications, or education; and information related to previous applications to us or previous employment history with us. When permitted by law, we may collect information about your race and ethnicity to assist with our diversity and inclusion programs. We use this information for the following purposes: to identify and evaluate job applicants; to verify your information; to complete employment, education, background and reference checks; to communicate with you about the recruitment process and your application; to comply with our legal, judicial, regulatory, administrative, or other corporate requirements; to analyze and improve our application and recruitment process; to accommodate individuals who may have specialized needs during the employment process; and to protect the rights, interests, and property of our business, other job applicants, employees, or the public, as required, or permitted, by law. We share this personal information with third parties, and we may also use this employment and application data for any other purpose set forth in this Privacy Notice.

Events and Video Teleconferencing: MCC hosts and uses video teleconferencing platforms to facilitate conferences, meetings, training events, and other programs. We often use online platforms that are owned and administered by a third-party service provider (e.g., Teams, Google, Zoom, WebEx, Skype for Business). Please be aware that our video teleconferencing may record the content, conversations, and discussions thereon, and such records may be stored or retained by our third-party service providers. By participating in our events and video teleconferencing, you hereby consent to the collection and retention of any information provided therein, and you hereby consent to the recording of such activities.

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