

Dear Sir/Madam,

We would like to inform you that **E.B.M. - Ente Bilaterale Metalmeccanici** (hereinafter referred to as "E.B.M." or the "Organisation"), in its capacity as Data Controller, will process - for the purposes and in the manner indicated below - the personal data that you have provided when registering as a "Worker" on the E.B.M. Platform. Furthermore, E.B.M. will process your personal data, including special data, as well as the personal and special data of your family members, including those attested by a declaration in lieu of certification, when you request, for yourself and/or for them, the contributions and/or the bilateral benefits provided by E.B.M., by filling in the appropriate forms that you will find in the reserved area.

1. Legal basis and purpose of processing

- **1.1.** The aforementioned processing is based on your consent and is aimed at registering you on the E.B.M.'s portal for the purpose of providing the benefits, foreseen by the E.B.M. Regulations currently in force, approved by the E.B.M. Assembly on 30 July 2020, required for yourself and/or your family members.
- **1.2.** The processing of your contact details (telephone and e-mail) is based on your consent and is aimed at sending you institutional communications to keep you up to date on the initiatives of the Organisation through a *newsletter* system, without prejudice to your right to "unsubscribe" if you no longer wish to receive such information.
- **1.3.** The processing of your contact details (telephone and e-mail) is also based on your consent and is aimed at carrying out *customer satisfaction* surveys for statistical purposes to assess the quality of the services offered.

2. Method of processing

The processing of your personal data is carried out, also with the help of electronic means, by means of the operations indicated in Article 4 no. 2) of the GDPR and precisely: the processing of personal data may consist of the collection, recording, organisation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

3. Mandatory nature of the provision of data

- **3.1.** The provision of data for the purposes referred to in point **1.1.** is mandatory. Any refusal to provide the above data will make it impossible to register in the indicated reserved area and therefore to request the benefits offered by the Organisation.
- **3.2.** The provision of data for the purposes referred to in points **1.2** and **1.3** is optional.

4. Scope of data communication

- **4.1.** Your personal and/or special data, as well as those of your family members for whom you apply for benefits provided by the Organisation, may come to the knowledge of E.B.M. staff appointed for this purpose, as well as, as Data Processors, the IT Services that manage the *databases* where your data are stored and the tax, accounting and actuarial consultants of the Organisation and the competent administrations for any possible verifications.
- **4.2.** The personal and/or special data you provide will not be disclosed.

5. Transfer of data abroad

- **5.1.** Personal data are stored on *servers* located in Italy. In any event, it is understood that the Data Controller may move the *servers* outside the EU if necessary. In this case, the Data Controller

hereby ensures that the transfer of data outside the EU will take place in accordance with the applicable legal provisions and in particular, those set out in Title V of the GDPR.

- **5.2.** Apart from the cases referred to in point 5.1., your data will not be transferred outside the EU.

6. Period of data retention

- **6.1.** Your data and those of your family members that you may have provided will be processed for the period of your registration with the organisation and also subsequently, in any case for a maximum of 10 years from the cancellation of your account in the reserved area, in order to carry out potential administrative and/or accounting audits.
- **6.2.** The data referred to in letter b) for the purposes referred to in point **1.2.** relating to the *newsletter* service will be kept until you indicate that you no longer wish to receive institutional communications from the Organisation or request to "unsubscribe" from the *newsletter* service.
- **6.3.** The data referred to in point b) for the purposes referred to in point **1.3.** relating to *customer satisfaction* will be kept for 12 months.
- **6.4.** The verification of the obsolescence of the processed data with respect to the purposes for which they were collected and processed is carried out periodically.

7. Data controller

E.B.M. – ENTE BILATERALE METALMECCANICI

Via della Colonna Antonina, 52

00186 – Rome

Pec: ebm@sicurezza postale.it

8. Data Protection Officer

E.B.M. has appointed a Data Protection Officer who can be contacted at the following address:

dpo@entebilateralemetalmeccanici.it

9. Rights of the data subject

You may at any time be informed of the data concerning you, find out how it was acquired, check whether it is accurate, complete, up-to-date and well kept, and request that it be corrected or deleted in accordance with Articles 16 and 17 of the GDPR. You also have the right to receive the personal data you have provided and which have been processed with your consent, in a structured, commonly used and machine-readable format and to revoke at any time any consent you have given regarding the processing of your data. Pursuant to Article 21 of the GDPR, you shall have the right to object, in whole or in part, to the processing of your data on grounds relating to your particular situation; if the data is processed for direct marketing purposes, you shall have the right to object at any time to its processing for that purpose. These rights may be exercised - if you wish, using the form provided by the Data Protection Authority and downloadable from the website www.garanteprivacy.it - by means of a specific request to be sent to the Data Controller by registered letter or by certified email.

You also have the right to lodge a complaint with the Data Protection Authority.

Rome, 30 November 2020

The Data Controller

Gian Piero Cozzo

EBM Chairman