

PROTECTION DATA POLICY

Introduction

Personal Data Protection represents a topic M.D. Micro Detectors S.p.A. really cares about. Already compliant to the Italian Regulation in terms of Privacy (dlgs. 196/2003), our company is now applying all the necessary transformations to actually respect the General Data Protection Regulation (GDPR 679/2016). As a part of Finmasi Group, M.D. Micro Detectors S.p.A. is adopting the General Group Guidelines about the Personal Data Protection. The following companies belong to Finmasi Group: Metalsider S.p.A.; Sidermed S.p.A.; Cistelaier S.p.A.; Techci Rhone Alpes S.A.; BridgEarth GmbH; Hotel Executive S.r.l. and Ristorante Exé 1985 S.r.l.

The present declaration has the aim of exposing our Policy in terms of Personal Data Protection. In particular, the nature and the scope of Personal Data we treat and process and the temporal limit for data storage are going to be explained. Finally, data subjects are informed about their rights.

The visit of our website does not require any indication of Personal Data. If specific functions or services are required (e.g. curriculum submission, newsletter ...), the treatment of data becomes necessary. In all of these cases, we previously ask the data subjects for explicitly providing their consent.

About the Controller

The controller for the purposes of the General Data Protection Regulation (GDPR) is:

M.D. Micro Detectors S.p.A. - P.IVA 1555630365

Strada Santa Caterina n. 235

41122 Modena (MO), Italy

Phone: +39 059 420411

Email: info@microdetectors.com

Website: www.microdetectors.com

There are two other company branches:

Micro Detectors Ibérica S.A.U.

Antic Camí ral de València, 38

08860 Castelldefels Barcelona

Telefono: +34 93448 66 30

Fax: + 34 93 645 28 15

E-mail: info@microdetectors.es

M.D. Micro Detectors (Tianjin) Co, LTD

XEDA International Industry area B2-3 Xiqing District

300385 – Tianjin, Cina

Telefono: +86 022 23471915

Fax: +86 022 23471913

E-mail: info@microdetectors.com

The controller is responsible for the definition of the purpose of data treatment and of the means of treatment (Art. 5).

Definitions

All the terms used within the present declaration are defined on the basis of what established by the General Data Protection Regulation (GDPR) – Article 4. In order to be legible and fully understandable for all the readers, the definitions of the most common terms are provided here:

1. **'personal data'** means any information relating to an identified or identifiable natural person ('data subject') such as a name, an identification number, location data, an online identifier;
2. **'processing'** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means;
3. **'restriction of processing'** means the marking of stored personal data with the aim of limiting their processing in the future;
4. **'profiling'** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;
5. **'pseudonymization'** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and

organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

6. **'filing system'** means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis;
7. **'controller'** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;
8. **'processor'** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
9. **'recipient'** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not;
10. **'third party'** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
11. **'consent'** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
12. **'group of undertakings'** means a controlling undertaking and its controlled undertakings;
13. **'supervisory authority'** means an independent public authority which is established by a Member State pursuant to Article 51;

Cookies and Navigation Data

The Internet pages of the website www.microdetectors.com use cookies: text files stored on client computers by the browser. Cookies contain some information about:

- IP address of visitors or user identification;
- URI addresses about the visited and required resources;
- Parameters of the users' operating systems;
- Navigation index.

Data contained in the cookies can be used by the company for:

1. Technical supporting operations directly related to the visit of the website;
2. Collection and elaboration of data, with the aim of conducting specific statistics with commercial purposes and/or for verifying the quality of offered services.

The usage of cookies is explicitly indicated in the website and the specific acceptance by visitor is required. Collected data are stored and treated by respecting the minimum security measures, as the Article 32 establishes.

Through specific settings on their browser, visitors have the possibility of disable the management of cookies by the visited websites.

Navigation data are collected and managed through tools provided by third parties. Here below the links referring to their privacy policy are presented:

Google Analytics: <http://www.google.com/analytics/terms/it.html> - <http://www.google.com/privacypolicy.html>

We do not diffuse to other subjects navigation data collected.

Social Networks

Our company uses the following social networks: LinkedIn and Youtube. Some of their functions are integrated within our website and provide an active contribution to the treatment of navigation data.

Use of LinkedIn

The controller has integrated components of the LinkedIn Corporation on this website. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, UNITED STATES. For privacy matters outside of the UNITED STATES LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

Further information about the LinkedIn plug-in may be accessed under <https://developer.linkedin.com/plugins>. During the course of this technical procedure, LinkedIn gains knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on LinkedIn, LinkedIn detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject.

The LinkedIn Cookie Policy is available under <https://www.linkedin.com/legal/cookie-policy>.

Use of YouTube

On this website, the controller has integrated components of YouTube. YouTube is an Internet video portal that enables video publishers to set video clips and other users free of charge, which also provides free viewing, review and commenting on them.

The operating company of YouTube is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, UNITED STATES. The YouTube, LLC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

Further information about YouTube may be obtained under <https://www.youtube.com/yt/about/en/>.

YouTube's data protection provisions are available at:

<https://www.google.com/intl/en/policies/privacy/>,

Newsletter

The Newsletter has the aim of informing the interested subjects about the company news. The general purpose of this treatment has a commercial nature. Data subjects freely provide their e-mail address and allow its future treatment. It is possible, in any moment, to withdraw the consent, with the consequent deletion of the address from the mailing list. The collected email addresses are stored and protected by the company. No diffusion is done to third parties.

Curriculum submission

Data collection is based on the free input by the interested subjects (candidates for job positions). The collected data are strictly related to the recruitment purpose: name, surname, phone, e-mail contact and professional information. Data classified within special categories (as stated by the Article 9) are not treated and are deleted.

The **general purpose** of the treatment of personal and professional data is strictly related to the eventual future employment contract. The obligations linked to the instauration of an employment contract make the above-mentioned treatment strictly necessary. Interested subjects are responsible for wrong data submission.

The **treatment** is performed both through automatic tools (electronic elaborators) and through manual tools and paper storage supports. All the security and reservation measures are applied (Article 32).

Collected data are not diffused to any third party.

The **data storage** is limited to the time elapse strictly necessary to the recruitment activities (interviews and candidate evaluation) and, in case of employment contract, until they are necessary to respect all the contract obligations.

Data are internally managed only by the Human Resources and the Responsible of the specific area of interest. Each external communication is strictly justified by the necessity of manage the employment contracts (e.g. Payroll Management).

Data collected during the expositions

Our commercial activity brings us to participate, each year, to different expositions. Several customers contacts are collected during these events. The consent to treat these data is considered as tacitly provided through the exchange of business cards or the oral or written communication of personal data. (GDPR, Article 7)

The treatment **purpose** has a commercial nature: sending of technical documentation, offers formulation, orders acquisition. The **deadline** for the data storage and treatment is linked to the management of the commercial relationship with the customer.

Commercial contacts are exclusively communicated to our partners operating on the reference markets (agencies).

Purposes and bases for the treatment

Personal Data treated by the Controller are within the following categories: name, surname, e-mail address, address, bank data. Collected data are treated lawfully, fairly and in a transparent manner, with explicit, specified and informed formulation of consent by the data subject.

The treatment base is represented by a legitimate interest of the controller, basing on its industrial and commercial activities, and/or on tax, legal and contractual compliance.

Treatment methods and duration

Data are treated through IT tools and manually, basing on paper supports. The minimum security level is granted, as stated by the Article 32 of GDPR. The duration of each treatment is previously communicated to the data subjects.

Data are communicated to third parties exclusively for activity strictly necessary for pre-contract, contract, legal, tax obligations and for satisfying the Controller's legitimate interests, when they are not opposed to the rights of the data subjects.

Rights of data subjects

Here below, a list of the rights granted to the data subjects is provided.

- Right of access (Article 15) – right of visioning the data treated and knowing the methods of treatment;
- Right to rectification (Article 16) – right of modifying the data, when they are wrong;
- Right to erasure or right to be forgotten (Article 17) – right of obtaining the complete and definitive deletion of personal data from all the storage supports;
- Right of restriction of processing (Article 18) – right of excluding the data treatment if referring to some specific purposes;
- Right to data portability (Article 20) – right of having data stored in a structured way, to grant the possibility of transferring them to other controllers;
- Right to object (Article 21) – right of opposing, in any moment, to the treatment;
- Right to withdraw data protection consent (Article 7) – right of rescinding from the data treatment.

Our company is able to grant the fully application of these rights. We also inform that the data subject has the right of lodging a complaint with the supervisory authority in case of failure (Article 77).

Data breach

In case of data breach, the company must communicate the violation to the Supervisory Authority within 72 hours from the discovery of the fact happening (Article 33). Furthermore, the company undertakes to notify the violation to all the interested data subjects (Article 34).

Supervisory Authority

Our company refers to the Italian Supervisory Authority for what concerns the Italian headquarter:

Modena, 25th May 2018

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Fax: (+39) 06.69677.3785
Centralino telefonico: (+39) 06.696771

E-mail: garante@gdpd.it

Posta protocollo@pec.gdpd.it
certificata:

The Spanish subsidiary (Micro Detectors Ibérica S.A.U.) responds to the indications of the Spanish Authority:

Agencia Española de Protección de Datos
C/ Jorge Juan, 6
28001-Madrid

Telefono: 901 100 099

Sito web: <https://www.aepd.es/index.html>