**Privacy Policy**

INFORMATION ON THE PROCESSING OF PERSONAL DATA[[1]](#footnote-1)

This Privacy Policy governs how **Marcolin** **Singapore Pte. Ltd.** (hereinafter referred to as “Marcolin” / “we” / “Company”), a subsidiary of MARCOLIN SpA, the owner and operator of the business-to-business platform (“B2B Platform” / “Website”) process the personal data through the B2B Platform. This information are provided in compliance with the Personal Data Protection Act 2012 (“PDPA”) of Singapore and explain the management of the data collected from data subjects interacting with the web services provided by the data controller and accessible via internet from this website and who can subsequently request the supply of products and services from the data controller. This information applies only to this website and not to other websites accessed by users via a link.

Any questions, comments or claims with respect to this Privacy Policy may be directed to the **Data controller** is Marcolin Singapore Pte. Ltd., located in Unit 04-04, Tower 1, Marina Bay Financial Centre, 8 Marina Boulevard Singapore, 018981 ("Data Controller”).

**TYPE OF DATA PROCESSED**

**Navigation data**

During normal operation, the IT systems and software procedures behind the functioning of this website acquire personal data (so-called log files) whose transmission is implicit in the use of Internet communication protocols. Information is not collected to be associated to identified data subjects but could, due to their same nature, enable their identification if processed and associated with data held by third parties. This data category includes IP addresses, domain names of computers used to connect to the website, URI addresses (Uniform Resource Identifiers) of the requested resources, request time, method used to submit the request to the server, size of the file obtained in response, numerical code indicating the status of the response provided by the server (successful, error, etc.) and other parameters concerning the operating system and IT environment of the user. The data are used with the only purpose of gathering anonymous statistical information on the use of the website and to control its effective functioning. The data may be used to ascertain responsibility in case of hypothetical computer crimes against the website and might be produced to the Judiciary should an explicit request be made.

**Data provided voluntarily by users**

The optional, explicit and voluntary sending of messages or requests to the addresses indicated on this website, or filling in the contact form, entails the acquisition of the address of the sender, as it is necessary to respond to requests, as well as of any other personal data included in the message body. Specific synthetic information will be gradually reported or shown in the web pages for particular services upon request.

After a first contact, we may ask the data subject for additional personal information; we will limit ourselves to the data necessary to respond to user requests and to establish and carry out contract agreements and fulfilments.

**Minors**

This Website is not destined to those under the age of 18 and the Data Controller does not intentionally collect information referring to minors. Should any information concerning minors be unintentionally registered, the Data Controller will promptly delete them.

**Nature of the data processed:** Data processed are collected directly from you and can include: personal data, addresses and phone numbers (including cell phone numbers), e-mail addresses, certified e-mail addresses, CVs or work information should you send a job application, registration and access data to the area reserved to investors, profiling cookies whose detailed information is provided in the website cookie policy.

**Purposes and legal bases**: Marcolin SpA will process the personal data you provide via the B2B Platform on the Website and subsequently acquired for the following purposes and according to the following legal bases:

| **Purpose** | **Legal base** |
| --- | --- |
| Manage communications with the data subjects and any request and, if necessary, communicate their data to third parties only with the purpose of complying with requests (e.g. requests made via the “contact” form or the e-mails found on the website or requests to subscribe to the newsletter or requests to assess an application) | Necessary for the execution of a contract or pre-contractual measures |
|  |   |
| Prevent or discover fraudulent activities or abuses harmful to the Website (navigation data);Exercise the rights of the Data Controller, e.g. exercise of a right in court. | Legitimate interest of the Data Controller |
| Comply with the obligations set out by the law, a regulation, Community legislation or order of the Authorities (e.g. access to the reserved area by registered investors); | Legal obligations - contract fulfilment and request from the data subject |
| Send information on products and services offered by the Data Controller - subscription to the newsletter via e-mail, post and/or phone. | Express consent of the data subject |
|  |  |
| user profiling activities (website cookies). | Express consent of the data subject |

**Processing methods**: Personal data will be processed according to rules of legality, fairness, relevance and not excess, using paper and electronic tools and guaranteeing their confidentiality and integrity.

**Possible recipients/recipient categories of personal data**: The data may be known by the people authorised to process them and by the data processors appointed by Marcolin SpA, who perform activities necessary to supply the services required as well as services of complementary nature (administrative, legal, tax, IT), including companies part of the Group for applications abroad and, following inspections and checks (if required), to all inspection bodies in charge of performing checks to verify the regularity of legal obligations.

Your personal data will not be disseminated to third parties.

**Obligation to provide data**: Apart from what is specified for navigation data, users are free to provide or not provide their personal data. Providing data is compulsory to enable us to process your requests.

Refusing to do so, or providing compulsory information that is wrong/incomplete, may make it impossible for the Data Controller to guarantee consistent processing.

Providing personal data for marketing purposes is optional.

**Data transfer to third countries:** Personal data will be managed and stored in servers located in Italy owned by Marcolin SpA or in servers located in Singapore owned by the Data Controller and/or companies part of the Group and/or third companies appointed as Data processors.

Should the data be transferred outside of Singapore, such transfer will be performed in accordance with the requirements prescribed under the PDPA to ensure that the organisation provides a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

**Retention period of personal data**: Personal data will be processed for the time necessary to comply with the purposes provided and will be retained:

1. In case of requests for information: for the time necessary to comply with the data subject's request;
2. in case of data supplied for the sending of marketing information or to subscribe to the newsletter, until the data subject opts out;
3. in case of registration data to access the website area reserved to investors and to the information contained for the period established by law
4. in case CVs or applications are sent: for the time necessary to assess the application or for a maximum of 3 years after the request is received, unless the data subject agrees to a prolonged retention or to a longer term corresponding to a work contract in case the interested party is hired.

**Rights of the data subject**: pursuant to Sections 16, 21 to 22A of the PDPA, the data subject has the right to:

* access, modify, cancel, limit and oppose the processing of data;
* obtain the data without impediment from the data controller, in a structured format of common use and readable by an automatic device to transmit it to another data controller;
* withdraw consent to the processing, without prejudice to the lawfulness of the processing based on the consent acquired before the withdrawal;
* Lodge a complaint to the Personal Data Protection Commission of Singapore.

Data subjects may exercise their rights at any time via:

* registered letter with return receipt addressed to Marcolin Singapore Pte. Ltd., located in Unit 04-04, Tower 1, Marina Bay Financial Centre, 8 Marina Boulevard Singapore, 018981;
* e-mail to: infosingapore@marcolin.com.
1. As defined under Section 2(1) of the Personal Data Protection Act 2012, to mean “data, whether true or not, about an individual who can be identified – (a) from that data; or (b) from that data and other information to which the organization has or is likely to have access”. [↑](#footnote-ref-1)