

PERSONAL DATA PROCESSING NOTICE

Issued pursuant to Articles 13 and 14 of Regulation (EU) 2016/679
General Data Protection Regulation

The following is intended to provide customers, including potential customers, and third parties in general who come into contact with our companies (the "data subjects") with a summary description of the main features of the processing of their personal data that may be carried out by:

RYOMA MC S.p.A. (P.IVA 07938370967) based in Corso Italia, n. 22, 20122 – Milano – group leader

CMA Macchine per Caffè Sr.l. (P.IVA 04518950268), based in Via Condotti Bardini n. 1, Susegana (TV)

Wega Macchine per Caffè S.r.l. (P.IVA IT04533130268), based in Via Condotti Bardini n. 1, Susegana (TV)

Astoria MC S.r.l. (P.IVA 04884860265), based in Via Condotti Bardini n. 1, Susegana (TV)

Macap S.r.l. (P.IVA 03336810274) based in Via Toniolo, n. 18, Maerne di Martellago (VE)

each acting as **Data Controller** (hereinafter the "Controller") for the purposes of the performance of the contract and the fulfilment of legal obligations relating to the contract to be entered into by the Data Subject with the individual company and, with respect to the **processing for marketing purposes** only, acting as **Joint Data Controllers** (hereinafter the "Joint Controllers"), being "two or more controllers who jointly determine the purposes and means of the processing" as provided for in Article 26 of Regulation (EU) 2016/679 (GDPR). The main content of the agreement between the Joint Controllers is available to data subjects by contacting the following email address: privacy@ryoma.it.

This means that if the Data Subject intends to enter into or conclude a contract with one of the above-mentioned Companies, the same Company will be the Data Controller of the data processed for the fulfilment of the aforementioned contract and will be Joint Data Controller together with all the other above-mentioned Companies of the data processed for marketing purposes. Processing will be carried out in accordance with Regulation (EU) 2016/679 - General Data Protection Regulation (the "Regulation") and Legislative Decree No. 196 of 30 June 2003, as amended by Legislative Decree 101/2018 (hereinafter the "Code").

Data" means "any information relating to an identified or identifiable natural person" and "processing" means "any operation or set of operations, performed with or without the help of automated processes and applied to personal data or sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction".

For further details, please refer to the detailed information below.

The information on the processing of personal data relating to the **conclusion and performance of a contract to which the Data Subject is a party or to the performance of pre-contractual measures taken at the request of the data subject, as well as to the processing of contact data for marketing purposes carried out by the Joint Data Controllers**, is provided in summary form in the table on processing below, which makes it easier to find the essential information on the processing of personal data. However, a detailed information notice will be available at a later date, which will provide a full picture of the information we are required to provide under Article 13 of the GDPR.

Who is the Data Controller ?	<p>The Data Controller is the company with which you intend to enter into or have entered into a contract or agreement, and may be:</p> <p>RYOMA MC S.p.A. (P.IVA 07938370967) based in Corso Italia, n. 22, 20122 – Milano</p> <p>CMA Macchine per Caffè Sr.l. (P.IVA 04518950268), based in Via Condotti Bardini n. 1, Susegana (TV)</p> <p>Wega Macchine per Caffè S.r.l. (P.IVA IT04533130268), based in Via Condotti Bardini n. 1, Susegana (TV)</p> <p>Astoria MC S.r.l. (P.IVA 04884860265), based in Via Condotti Bardini n. 1, Susegana (TV)</p> <p>Macap S.r.l. (P.IVA 03336810274) based in Via Toniolo, n. 18, Maerne di Martellago (VE)</p> <p>Contact details: privacy@ryoma.it</p> <p>Contact details of the Data Protection Manager: dpo@ryoma.it</p> <p>With regard to processing for marketing purposes, the above-mentioned companies act as Joint Data Controllers.</p>
-------------------------------------	---

What Personal Data do we process?	<ul style="list-style-type: none"> Personal and contact data (e.g. name, surname, fiscal code/tax code, address, e-mail address, telephone number); personal data related to billing and payment methods.
Why do we process Personal Data? (Purpose)	<ol style="list-style-type: none"> In order to be able to offer our products and services and generally for the conclusion and proper performance of a contract with the data subject and/or for the performance of pre-contractual activities and measures at the request of the data subject; to comply with legal obligations or public authority orders; for the establishment, exercise or defence of rights, including in court and when the authorities exercise their functions; to send commercial information, also by SMS and newsletters, on services and products of the contractors, subject to your consent.
What is the basis of the Treatment? (Legal Basis)	<ol style="list-style-type: none"> Processing under par. 1) is necessary for the performance of a contract to which the Data Subject is party or for the performance of pre-contractual measures taken at the request of the Data Subject. Processing under par. 2) relates to the performance of legal obligations. Processing under par. 3) relates to the legitimate interest of the Data Controller. Processing under par. 4) is subject to the acquisition of the consent of the Data Subject.
How do we process personal data?	<p>In electronic and paper form, in compliance with all the precautions taken by the Data Processor(s) to guarantee security, confidentiality and control.</p> <p>The data may also be stored and processed on servers located outside the European Community, in compliance with the relevant regulations in force.</p>
To whom do we disclose personal data? (Categories of recipients)	<ol style="list-style-type: none"> Employees, co-workers, subjects appointed and authorised by the controller(s); Service providers acting as data processors pursuant to Article 28 GDPR; Subjects entitled by law to access the data; Subjects to whom communication is necessary for the fulfilment of contractual obligations; Public authorities; Third parties. <p>The personal data processed are in no way subject to dissemination.</p>
How long do we keep personal data?	<p>The personal data will be kept for the time necessary to achieve the above-mentioned purposes. In any case, the processing may not last longer than the limitation period for exercising the rights relating to the data processed.</p> <p>Criteria used to determine the additional data retention period:</p> <ol style="list-style-type: none"> Pursuit of purposes relating to processing. Retention time required by law. Withdrawal of consent by the Data Subject - opt out (in the case of processing based on consent, e.g. the sending of commercial information and newsletters).

	d. Maximum time limit allowed by the applicable legislation to protect the rights and/or interests of the controller/joint controller
Is the provision of personal data compulsory or optional? What happens in case of refusal to provide personal data?	With regard to the processing of data carried out based on the contractual relationship, the provision of data is mandatory in order to carry out pre-contractual measures and the contract; refusal to provide data may result in the contract not being concluded and the requested service not being provided. The provision of data is also necessary to comply with legal obligations. On the other hand, the provision of data is optional for the sending of commercial information and newsletters relating to the services and products of the contractors; the refusal to provide data for this specific processing will not have any consequences for the fulfilment and execution of the other purposes indicated and, therefore, for everything connected with the establishment and execution of the contract, but will only make it impossible to carry out the aforementioned activity.
What rights does the Data Subject have?	The data subject has the right to: <ul style="list-style-type: none"> a) Access the data in our possession and request its communication in intelligible form; b) Ask for the data to be updated, corrected and/or supplemented; c) Ask for the deletion ('right to be forgotten'); d) Request the restriction of processing; e) Request notification of updating, rectification, erasure, restriction; f) Request data portability; g) Object to the processing; h) Withdraw consent given; i) Complain to a supervisory authority.

1 - Identity and contact details of the Data Controller and Data Protection Officer

The **Data Controller** is the company with which you intend to conclude or have concluded a contract/agreement and may be:

RYOMA MC S.p.A. (P.IVA 07938370967) based in Corso Italia, n. 22, 20122 – Milano

CMA Macchine per Caffè Sr.l. (P.IVA 04518950268), based in Via Condotti Bardini n. 1, Susegana (TV)

Wega Macchine per Caffè S.r.l. (P.IVA IT04533130268), based in Via Condotti Bardini n. 1, Susegana (TV) **Astoria MC S.r.l.** (P.IVA 04884860265), based in Via Condotti Bardini n. 1, Susegana (TV)

Macap S.r.l. (P.IVA 03336810274) based in Via Toniolo, n. 18, Maerne di Martellago (VE)
Contact details: privacy@ryoma.it.

Contact details of the Data Protection Manager:
dpo@ryoma.it.

With regard to processing for marketing purposes, the above-mentioned companies act as **Joint Data Controllers**.

2 - Type of Data Processed

The Data Controller collects and processes data from Data Subjects for the purposes specified in Section 3 below. The following is an illustrative list of the data processed:

- (i) personal data, such as name, surname, date and place of birth, fiscal code, personal identity document, driving licence
- (ii) contact data, such as domicile address, e-mail address and telephone numbers (also as co-owner for the purpose of sending commercial communications including newsletters)
- (iii) billing and payment data, such as credit card payment data, IBAN.

3 - Purpose and legal basis of data processing

The Data will be processed for the following purposes, in accordance with the aforementioned legislation:

- 1) For the **proper management of the contractual relationship** between the Data Subject and the Data Controller in order to guarantee access to the services offered. The purposes just described all relate to the legal basis for the performance of a contract to which the data subject is a party or **for the performance of pre-contractual measures** taken at the request of the data subject.
- 2) to **fulfil legal obligations** or to comply with orders from public authorities;
- 3) for the **establishment, exercise or defence of legal rights, including legal proceedings** (e.g. for the purposes of credit recovery or credit protection,

protection of company assets, settlement of disputes); this processing purpose is based on the **legitimate interest of the Data Controller**;

- 4) **for the sending of commercial information, also by SMS and newsletters**, concerning the services and products of the Contractors; such processing is based on your specific and unconditional **consent**.

4- Data processing methods

Data will be processed by manual, paper, electronic or telematic means in accordance with the Regulation and the Code, and in any case in such a way as to guarantee the security and confidentiality of the data and to prevent unauthorised disclosure or use, alteration or destruction, by means of effective physical, logical and organisational security measures.

As a general rule, the Data processed will not be transferred outside the EU; however, should a transfer of data outside the EU become necessary, it will be carried out in compliance with the provisions of Articles 44 et seq. of the GDPR. If countries do not guarantee an adequate level of personal data protection according to the standards set by the EU Regulation, the necessary precautions will be taken for a legitimate data transfer (e.g. by implementing the standard contractual clauses approved by the European Commission). For the sending of commercial communications, including newsletters, tools that involve the transfer of data to the US may be used, subject to verification of compliance with the Privacy Framework (e.g. Mailchimp).

Information on the transfer abroad of personal Data may be requested at any time by contacting the Controller at the contact details given. The Controller will carry out the processing by means of a personalised and never fully automated evaluation process.

5- Data recipients

The Data may be communicated (within the limits of their competence) to

- a) subjects to whom the communication of data is necessary for the operation and supply of services and for the performance of contractual or pre-contractual obligations, who act as data processors on the basis of written agreements concluded with the data controller or as independent data processors. A list of all the Data Processors may be requested by means of a communication sent to the addresses indicated under point 1;
- b) agents and persons authorised by the Controller / Joint Controllers who have undertaken to maintain confidentiality or who are subject to an adequate legal obligation of confidentiality (e.g. employees and collaborators of the Controller / Joint Controllers). The data will not be disclosed.

In order to comply with legal obligations, regulations, EU legislation or contractual obligations, as well as to exercise any legal rights, the data subject's data may be accessed by the following third parties **(i)** banks, credit and financial institutions **(ii)** tax, legal or accounting consultants; **(iii)** companies that provide the Controller with services that are essential for the recovery of debts; **(iv)** companies that provide the Controller with services that are essential for the management of the contractual relationship; and **(v)** public and private supervisory and control authorities and bodies (e.g. Agenzia delle Entrate, judicial authorities, etc.).

6 Data retention period

Within the scope of the above-mentioned purposes, Data will be kept for the time strictly necessary to achieve the purposes for which they were collected and processed. The criterion for determining the actual retention period of the data will be the limitation period of the actions arising from the relationship with the data subject. Without prejudice to the need to keep the data for the purpose of fulfilling legal obligations or for the establishment, exercise or defence of legal rights, the data of the data subject will not be kept for longer than 10 years from the termination of the relationship, unless the statute of limitations is expressly interrupted, after which the data will be irreversibly destroyed or rendered anonymous, unless their further retention is necessary to fulfil legal obligations or to comply with orders issued by public authorities and/or supervisory bodies. The data relating to the sending of commercial information and newsletters on the services and products of the joint owners will be kept in the archives of the joint owners for the time necessary to fulfil the purpose and, in any case, until the data subject withdraws his or her consent (opt-out).

7. Compulsory and optional nature of the provision of personal data

The provision of the Data is compulsory for the performance of the contractual services directly provided by the Data Controller to the Data Subject and for the fulfilment of legal obligations; the failure to provide the Data makes it impossible to provide the requested service and to comply with the law. On the other hand, the provision of data is optional for the purposes of sending commercial information and newsletters relating to the services and products of the data controller; the refusal to provide data for this specific processing will have no consequences for the fulfilment and execution of the other purposes indicated and, therefore, for everything connected with the establishment and execution of the contract, except for the impossibility of carrying out the aforementioned activities.

8 - Rights of the Data Subject

By sending a communication to the registered office of the Data Controller or to the address privacy@ryoma.it, each Data Subject may, at any time, exercise his or her rights under Articles 15 et seq. of the Regulation, including: **(i)** confirmation as to whether or not data concerning him or her are being processed; **(ii)** access to his or her data and to the information referred to in Article 15 of the Regulation; **(iii)** rectification, without undue delay, of any inaccurate data or integration of incomplete data **(iv)** to request the deletion of data relating to him without undue delay; **(v)** to request the limitation of the processing of data relating to him; **(vi)** to be informed of any rectification or deletion or limitation of the processing of data relating to him; **(vii)** to obtain data relating to him in a structured, commonly used and machine-readable format; **(viii)** to revoke, at any time and free of charge, the consent previously given. The full list of the rights of the data subject can be found at <https://www.garanteprivacy.it/Regolamentoue/diritti-degli-interessati>.

The exercise of the above rights is not subject to any formal constraints and is free of charge. A response to the Data Subject's request shall be provided within one month of receipt of the request. In cases of particular complexity, this deadline may be extended; in such cases, the Data Controller undertakes to provide at least one interim communication within one month of receipt of the request. In the event of the exercise of one of the rights provided for in the Regulation, the Data Controller reserves the right to verify the identity of the requesting data subject by requesting the submission of a photocopy of an identity document proving the legitimacy of the request. Once the identity of the requesting data subject has been confirmed, the photocopy received shall be immediately destroyed.

9 - Complaint to the Data Protection Authority

If the Data Subject considers that the Processing of his or her personal data violates the provisions of the Regulation, he or she may always lodge a complaint with the Data Protection Authority (www.garanteprivacy.it), or with the Data Protection Authority of the country in which he or she normally resides, works or where the alleged violation occurred.