



## PRIVACY NOTICE

pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter the “Regulation”) on the protection of natural persons with regard to the processing of personal data

Dear Participant,

Markas S.r.L., as the Data Controller, wishes to inform you that the personal data you provide will be processed in accordance with the principles established by the Regulation: lawfulness, fairness, and transparency.

### 1. Purposes of data processing and legal basis for processing

Markas S.r.L. wishes to inform you that the processing of your personal data will take place within the scope of the comprehensive management of the initiative and for purposes related to the implementation of ideas on the Markas Lab Ideas portal. In particular, processing may occur for the following purposes:

- Corporate value development through the active involvement of participants in the collection and promotion of ideas and contributions that support the Organization’s sustainable growth and innovation - *“processing is necessary for the purposes of the legitimate interests pursued by the controller [...]” – Art. 6(1)(f) of the Regulation;*

#### **Art. 6(1)(f) of the Regulation;**

- Management of the process of collecting and evaluating ideas on the dedicated portal - *“Processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures [...]” – Art. 6(1)(b) of the Regulation;*

- Management of the awards ceremony and awarding of the prize (in accordance with the procedures described in the contest rules) for all employees who are winners of the initiative - *“Processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures [...]” – Art. 6(1)(b) of the Regulation;*

- Markas S.r.L. also reserves the right to publish the submitted ideas, as well as the first and last name of the participant who proposed them, on the company website and other platforms such as social media, industry magazines, and related initiatives. Furthermore, Markas S.r.L. reserves the right to contact participants for purposes related to the ideas uploaded to the Markas Lab Ideas portal. The data will be processed only with the data subject’s express consent, pursuant to Article 6(1)(a) of the Regulation - *“processing is necessary for the purposes of the legitimate interests pursued by the controller [...]”- Art. 6(1)(f) of the Regulation.*

### 2. Data Processing Methods at Markas Lab Ideas

Data will be processed by Markas S.r.L.:

- in paper, electronic, and/or digital formats;
- by personnel authorized to perform such tasks;
- using appropriate organizational and technical measures to ensure data confidentiality and prevent access by unauthorized third parties.

### 3. Categories of personal data processed

General personal data: first name, last name, tax ID number, email address, and bank account information (the latter only for winning participants).



#### 4. Duration of processing

Personal data is retained only for as long as is necessary to fulfill the purposes for which it was collected and processed, in full compliance with the principle of data minimization.

#### 5. Rights of the Data Subject

Under current legislation, the data subject may, upon request, access their data at any time. The data subject has the right to withdraw their consent at any time. Furthermore, if they consider the data to be inaccurate or incomplete, they may request its correction or supplementation, respectively; where the legal conditions apply, they may object to its processing, request its erasure, or request the restriction of processing. In the latter case, with the exception of storage, personal data subject to processing restrictions may be processed only with the consent of the data subject, for the legal exercise of a right by the data controller, for the protection of the rights of a third party, or for reasons of substantial public interest. If the data subject has exercised their rights pursuant to Articles 16, 17(1), and 18 of Regulation (EU) 2016/679, Markas S.r.L. will notify the recipients to whom the personal data were transmitted of any corrections, erasures, or restrictions on processing that have been made. The data subject also has the right to data portability to another controller.

If you believe your rights have been violated, you have the right to file a complaint with the Italian Data Protection Authority: [www.garanteprivacy.it](http://www.garanteprivacy.it)

#### 6. Disclosure of Data to Third Parties

In connection with the purposes indicated above, your personal data may be disclosed to third parties with whom the Data Controller has a contractual relationship and who have been appointed as Data Processors (Article 28 of EU Regulation 2016/679), when such disclosure is necessary or functional to the conduct of our business. The data collected may be provided to companies within the Markas Group solely for the purposes indicated above and processed by authorized personnel. Your data will not be used in automated decision-making processes.

#### 7. Data Controller

Markas S.r.L., located at Via Macello 61 (39100), Bolzano, Italy.

Phone: (+39)0471307611

Email: [IT-privacy@markas.com](mailto:IT-privacy@markas.com)

#### 8. Data Protection Officer (DPO)

Renorm S.r.L., located at Via Macello No. 50 (39100), Bolzano, Italy.

Phone: (+39)04711882777

Email: [renorm@legalmail.it](mailto:renorm@legalmail.it)