

Privacy policy on processing of Personal Data pursuant to EU Regulation 2016/679 (GDPR)

Regarding the personal data provided for the application to join the Specialized Assistance Service, the following information is provided.

1. Data Controller and Data Protection Officer

The Data Controller is the Chamber of Commerce of Milan Monza Brianza Lodi (hereinafter, for brevity, also “the Chamber of commerce”) - Via Meravigli 9/B, 20123, Milan <http://www.milomb.camcom.it> - cciaa@pec.milomb.camcom.it.

The Chamber of commerce has appointed a Data Protection Officer pursuant to Art. 37 GDPR reachable at RPD@mi.camcom.it.

The Data Controller reserves the right to disclose the contact details of special agencies, investee companies, or other bodies of the Chamber Holding, appointed as Data Protection Officers or recognized as Joint Data Controllers, to the Data subject when the service is provided.

2. Purpose and legal basis of the processing

The personal data provided will be processed with the following objectives:

- Organizing individual and group meetings linked to specialized first orientation assistance;
- Registering users of the service, maintaining communication with them and providing all necessary information to facilitate the most effective use of the service;
- Monitoring user satisfaction to gather valuable feedback and enhance access to the Specialized Assistance Service.

User satisfaction is assessed online by automatically sending invitations to participants to the meetings. The survey will be anonymous, involving only the processing of device and browser data of the users.

The legal basis of the processing, as per art. 6 par. 1 letter e) of the GDPR, is the performance of tasks carried out by the Chamber of Commerce in the public interest, in accordance with Italian Law No. 580/1993, particularly those in support of the competitiveness of local businesses.

Upon submission of the application, the provided data will be entered into the Chamber of Commerce's digital platform (CRM), designed to assist and interact with customers. This platform aims to personalize support, understand needs, improve services, and offer the most responsive solutions.

The legal basis for the further processing carried out within this platform is art. 6 par. 1 letter e) of the GDPR, as the processes are necessary for the execution of tasks of public interest, as mandated by the reforms of the Public Administration (Decree 150/2009), which introduced the central role of citizens in the service report.

The Chamber of Commerce may carry out processing for marketing and profiling purposes jointly with Agenzia Italiana per l'Internazionalizzazione - Promos Italia Scrl, only upon explicit consent given in accordance with art. 6 par. 1 letter a) of the GDPR, as described in the following [privacy policy](#).

3. Processing methods

The personal data collected for organizing the Specialized Assistance Service and the satisfaction survey are processed solely for the purposes outlined in point 2. This processing is carried out exclusively by authorized

personnel, who are adequately trained and employed either by the Data Controllers or by any Joint Controller or Data processors eventually appointed by them.

The personal data processed within the CRM platform may be shared with personnel from other offices of the Administration who, while performing their duties of assisting and interacting with users, act as authorized to process.

Data processing is conducted in both paper and electronic formats, employing recording, archiving, and/or computerized processing procedures as to ensure security and privacy. Personal data processed by the Chamber of Commerce are not transferred to third countries or international organizations outside the European Economic Area.

4. Data provision

Providing personal data is voluntary. However, failure to provide personal data will prevent the delivery of the service. Similarly, filling out the satisfaction survey is optional and not completing it will not affect the user's right to access the service.

5. Data dissemination and communication

The provided data are processed solely for the purposes outlined in point 2 and are shared with external experts recruited to deliver the service, who are specifically designated for data processing. Data collected through satisfaction surveys is only disclosed in an aggregate form to prevent the identification of individual users.

6. Data retention period

The personal data are processed only for the time necessary to achieve the purposes stated at point 2 in compliance with the principle of "storage limitation" (art. 5 par. 1. lett. e) GDPR) and are stored for a maximum period of 5 years. The personal data processed within the CRM platform will be stored for a maximum period of 10 years.

7. Data subject's rights and safeguards

The data subjects can exercise the rights granted by artt. 15 et seq. of GDPR and by the privacy legislation. Specifically, data subjects have the right to access to their personal data, to rectify, update or erase them if incomplete, inaccurate or unlawfully collected, the right to object or to restrict the processing and the right to ask for data anonymization. If personal data processing is based on the data subject's consent, they have the right to revoke it at any time, without affecting the lawfulness of processing conducted prior to the revocation.

The exercise of the aforementioned rights is governed by a regulation that defines the conditions and methods of implementation, which can be found – alongside the application forms – at <https://www.milomb.camcom.it/regolamenti>.

In addition, data subjects have the option to file a report or complaint with the Italian Data Protection Authority, following the conditions set forth by the Authority itself.