

PRIVACY POLICY

In conformity with the provisions of Italian Legislative Decree No 196/2003 – Personal Data Protection Code – and **Recommendation No 2/2001 of the Working Group Art. 29 of Directive 95/46/EC** Morning Capital Srl, with registered office in Milan, Via Aldo Rossi 4, telephone +39 02 89.83.5811, e-mail info@morningcapital.eu hereby informs you, in relation to the processing of your personal data, of the following:

DATA PROCESSED AND PURPOSES

Navigation data During normal operation, the computer systems and software procedures for the operation of this Website acquire some personal data which is implicitly transmitted in the use of Internet communication protocols. This information is not gathered in order to be associated to the identified Data Subjects, but by its very nature it could, if processed and associated to data held by third parties, lead to the identification of the users. This category of data includes the IP addresses or names of computer domains used by the users when connecting to the website, URI (Uniform Resource Identifier) addresses of requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in reply, the numerical code indicating the state of the reply given by the server (OK, error, etc.) and other parameters concerning the operating system and computer environment of the user. The data collected may be used to ascertain responsibility in the event of computer-related crimes to the detriment of the website.

Cookies

For information on cookies refer to the cookie policy on the website.

Data provided directly by the user

The personal data provided by the user optionally (e.g. when requesting information or clarifications, using the telephone numbers indicated in the website or by writing to the indicated e-mail addresses) are used solely to process any requests made. The website areas or pages offering any such specific services include specific privacy policies with all the information on the processing of the data provided.

Nature of the provision of data

With the exception of navigation data, required to implement IT and telematic protocols, the provision of personal data by users is free and optional. However, the failure to provide such data will lead to the impossibility to process such requests. Your personal data will be used to perform the activities with purposes strictly related to the institutional purposes of the undersigned company. The data will be processed using storage procedures which, as required, guarantee the security and confidentiality of the data.

Methods of processing

The data is processed using IT supports. The data is stored in electronic archives, adopting the minimum security measures laid down by the legislator. The data will be kept for the time strictly necessary to process the requests of the data subject and in any case in compliance with all legal terms.

Communication and disclosure

The data collected will not be disclosed. The data will not be disclosed to persons outside the Agency without the express consent of the data subject, except in the case in which communication to third parties (companies and consultants providing IT services and related assistance, agents, communication and marketing consultants) is necessary to comply with legal obligations or process the requests made by the data subjects or if such third parties (falling in one of the categories indicated) work in an external privacy manager capacity. The data subject may request the list of external parties performing their activity in an external privacy manager capacity pursuant to Art. 29 of the Privacy Code.

Rights of the data subject

The data subject may request information at any time, and may exercise the rights laid down in Art. 7 of the privacy code, by sending an e-mail to info@morning-capital.eu

[...] Art. 7 of Italian Legislative Decree 196/2003

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and the communication of such data in an intelligible form.
2. The data subject shall have the right to be informed:
 - a. of the source of the personal data;
 - b. of the purposes and methods of the processing;
 - c. of the logic applied to the processing, if the latter is carried out with the help of electronic means;

- d. of the identification data concerning data controller, data processors and the representative designated as per Article 5(2);
 - e. of the entities or categories of entity to whom or which the personal data may be communicated and who or which may gain knowledge of said data in their capacity as designated representative(s) in the territory of the State, data processor(s) or person(s) in charge of the processing.
3. The data subject shall have the right to obtain:
- a. the updating, rectification or, where interested, the integration of the data;
 - b. the erasure, transformation into an anonymous form or suspension of data processed in violation of the relevant legislation, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
 - c. certification to the effect that the operations as per points a) and b) have been notified, as also related to their contents, to the entities to whom or which the data have been communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.
4. The data subject has the right to object, wholly or partly: a) on grounds relating to his or her particular situation, to the processing of personal data concerning him or her, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys. [...]

CONTROLLER: MORNING CAPITAL S.r.l.

The data subject may also contact the Controller at any time to exercise the rights listed in Art. 7 of Italian Legislative Decree No 196/2003 and/or by sending requests to the following address: Morning Capital S.r.l. Via Aldo Rossi n. 4 – 20149 Milan

e-mail: info@morningcapital.eu