

PRIVACY POLICY

Thank you for your interest in our products and services. Protecting your privacy is very important for us. Here below you will find the details on the processing of your data pursuant to Art. 13 of Regulation (EU) No 679/2016, as well as Art. 13 of Italian Legislative Decree (D.Lgs.) No 196/2003.

This privacy policy applies to the website of Morning Capital S.r.l. with registered office in Via Aldo Rossi, 4 Milan, Italy and informs all data subjects on the procedures used to ensure the protection of personal data. This policy illustrates which data are collected and for which purposes, the methods of processing and how they are used.

1. PURPOSES OF THE PROCESSING

1.1. Contact requests.

The personal data (hereinafter for short, "Data") entered on the website are collected and used by the company, also using IT tools and procedures, for purposes directly linked and instrumental to the provision and management of Contact requests, in the terms specified below.

We collect your personal data (name, surname and e-mail), to respond to contact requests and to fill out any requests for information. The mandatory fields are marked as such, as in these cases we need your data to process the request in relation to the reasons for your contact. Your data will be retained for the period of time required to process your requests, as well as according to any statutory fiscal and contractual terms, unless you have expressly consented to any further different use of your data. These data, therefore, are and will be processed by us for the sole purpose of processing your request, and to pursue any other compatible purposes.

The data will be processed, on IT supports and hard copies, exclusively by authorized persons (employees, staff, interns) and will be retained for the time required to process and respond to your request and, subsequently, if there are no administrative and/or contractual reasons, for a maximum period of two years. For the whole retention period, the data will not be disclosed or sent to third parties.

Provision of data is optional. However, the even partial failure to provide the data expressly indicated as necessary to pursue the purposes indicated in the previous point, will make it impossible for our company to process your contact request.

Accepting these points, the User authorizes the company to collect, disclose and transfer their personal data to the subjects, within the limits and for the purposes indicated in this privacy policy.

1.2. PROMOTION OF REAL ESTATE MANAGEMENT SERVICES AND THE SENDING OF INFORMATION AND PROMOTIONAL MATERIALS

The personal data are collected for the purpose of providing some of the services of and information on the company, as well as to inform you of our new proposals. Furthermore, if the user decides to provide their consent, their data may also be used for the promotion of the services and products offered by Morning Capital s.r.l. and to send information or promotional materials.

2. DATA RETENTION PERIOD

The personal data will be stored in hard copy and/or electronic/computerized format for the time strictly necessary to meet the purposes listed in paragraphs 1 and 2 above, in compliance with your privacy and the laws in force. As regards any Contact Requests, the data will not be retained for a period of more than 2 years, without prejudice to

other specific legal or regulatory needs, or due to the legitimate interests of the company. For purposes relating to promotional activities and the sending of information materials, we will store your data for a maximum period equal to that laid down in the applicable laws, in any case for no more than 2 years following the last interaction.

3. POSSIBILITY OF CONTACT AND RIGHTS OF THE DATA SUBJECT

The data subject has the right to free information on the personal data stored by us, and, if required,

- the right to rectification,
- restriction of processing and
- portability of their data or erasure of the said data.

The data subject also has the right to:

- withdraw consent to the data processing at any time;
- obtain confirmation as to whether or not personal data concerning him/her are being processed;
- obtain access to their data or to the following information purposes of the processing, categories of data processed, any recipients and/or categories of recipients to whom the data have been and/or will be disclosed, the retention period);
- obtain the rectification of any incorrect data concerning them and/or the integration of any incomplete data, also providing us with an additional declaration;
- obtain the erasure of the data, in the cases laid down in Art. 17 of Regulation (EU) No 679/2016, as well as the restriction of processing in the cases laid down in Art. 18 of Regulation (EU) No 679/2016. The data subject also has the right to the portability of their data, in the cases in which the processing is based on their consent, and to lodge a complaint with the Data Protection Authority.

For any questions on the collection, processing and use of personal data, information on, rectification, suspension or erasure of the data or to withdraw any consent or object to a specific use of the data, please contact our corporate Data Protection Officer (DPO):

Via Aldo Rossi, 4 - Milano (MI)

certified e-mail: direzione.morningcapital@legalmail.it

e-mail: privacy@morningcapital.eu

Tel. +39 02 89835811

In the subject, please indicate the reasons for the request and attach a copy of a valid ID document.

To the extent to which we process personal data, according to the above-indicated purposes, the User has the right to object to the processing of their data with effect for the future. Having exercised the right to object, we shall no longer process your personal data for these purposes, unless we can demonstrate that there are urgent reasons for protecting such processing that prevail over your interests, rights and freedoms, or if the processing is required to enforce, exercise or defend other legitimate rights.

Last updated in May 2021