

Privacy Policy pursuant to article 13 on the use of personal data of Users visiting [www.mia-platform.eu](http://www.mia-platform.eu).

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(Latest Update 15/01/2020)

MIA s.r.l. (hereinafter MIA) processes the personal data of Users visiting [www.mia-platform.eu](http://www.mia-platform.eu) in compliance with EU Regulation no. 2016/679 (hereinafter GDPR) on the protection and processing of personal data.

In accordance with article 13 of the GDPR, information is given below on the processing of Users' data when browsing [www.mia-platform.eu](http://www.mia-platform.eu) and other data sent voluntarily by Users when using the chat service and/or sending emails to the addresses published on the aforementioned website.

## 1. Definitions

Personal Data: means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Reg. EU 2016/679 art. 4 no. 1). Personal data are a macro-category that includes the following sub-categories:

- Common data (e.g.: identifying data such as name, surname, address, tax code);
- Special personal data and personal data relating to criminal convictions or offences (pursuant to articles 9 and 10 GDPR: data revealing "racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation; data relating to criminal convictions and offences");

Browsing Data: these data fall within the sub-category of common personal data. More precisely, reference is made to personal data which are acquired by the IT systems and software procedures in charge of operating this website during the normal course of operation, and which are technically essential to ensure the functioning and security of sessions and the anonymous statistical processing of corresponding accesses. This type of information is not collected to be associated with any identified data subjects, but because of its very nature could enable the identification of users through processing and association with data held by third parties. Examples of browsing data include: IP addresses or domain names of the computers used by users who connect to the site, URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the numerical code indicating the status of the response from the server (successful outcome, error, etc.) and other parameters related to the user's operating system and IT environment.

User: means the natural person to whom the [www.mia-platform.eu](http://www.mia-platform.eu) browsing data, and any other personal information released on the above website as a result of sending emails and/or using the chat service, refer to.

Processing: means any operation or set of operations which is performed, whether or not by electronic means, concerning the collection, recording, organisation, structuring, storage, processing, adaptation, alteration, retrieval, use, consultation, disclosure by transmission, dissemination or otherwise making available, alignment, combination, restriction, erasure or destruction of personal data, even if such data are not recorded in a database.

Data Controller: means the person that determines the purposes, means of processing and the instruments used, including the security profile.

Data Processor: means the person that performs certain processing activities acting on the instructions of the Data Controller.

Person in charge of Data Processing: means the single employee and/or associate authorised to process data on the basis of instructions received from the Controller.

## 2. Who handles the Data

MIA s.r.l., VAT No. 08045100966, with registered office in Milan, Via Carroccio 16, is the Data Controller.

Some of the processing operations specified under point 5 are entrusted to Data Processors, as detailed thereunder.

The list of Persons in charge of Data Processing authorised by the Data Controller under point 3 and the relevant sub-lists, for the purposes specified in this Policy, may be viewed at the Data Controller's offices, following submission of an email to [privacy@mia-platform.eu](mailto:privacy@mia-platform.eu).

## 3. What kind of personal data we collect

MIA collects and uses certain personal data of the Users, as specified below depending on the type of service used by Users while browsing our website.

### 3.1 Browsing data

When Users access [www.mia-platform.eu](http://www.mia-platform.eu), MIA collects certain information to make it safe for Users to browse its website, on which web analysis services are used.

For more details, please refer to the Section on cookies.

### 3.2 Forms

When filling out the forms available on [www.mia-platform.eu](http://www.mia-platform.eu) to use the contact services, to download technical documents for free or to use any other services appearing on the header of the form, Users agree to the use of their personal data by MIA for the purpose of providing the above services.

MIA always asks Users for their email address, which is regarded as common personal data.

MIA may also request additional common personal data such as:

- Surname;
- Name;
- Company;
- Job position.

### 3.3 Newsletter

Please refer to the Section containing information about the processing of personal data for the newsletter service.

### 3.4 Emails

When Users contact MIA voluntarily for any information about the company's activities or for sending spontaneous applications for a job position by email to one of the following email addresses provided on [www.mia-platform.eu](http://www.mia-platform.eu) ([career@mia-platform.eu](mailto:career@mia-platform.eu), [info@mia-platform.eu](mailto:info@mia-platform.eu)), MIA collects and processes the following common personal data:

- Email address;
- Surname;
- Name;
- Any other personal data contained in the message sent.

### 3.5 Chat

When Users use the instant messaging tool available on [www.mia-platform.eu](http://www.mia-platform.eu) to contact MIA quickly, MIA collects and processes the following common personal data:

- Name;
- Surname;
- Any other personal data contained in the message sent.

#### 4. How personal data are used

MIA processes the browsing data referred to in art. 3.1 pursuant to art. 6, paragraph 1, letter f) (MIA's legitimate interest) of the GDPR. These data allow Users to use the website safely.

MIA processes the personal data referred to in points 3.2, 3.3, 3.4 and 3.5 pursuant to art. 6, paragraph 1, letter a) (User's consent), b) (performance of the service agreement by MIA), f) (MIA's legitimate interest) of the GDPR.

The data are used for processing requests sent by Users either by filling out a form, subscribing to the newsletter service and/or sending an e-mail or a chat message.

Specifically, MIA shall use Users' data for:

- Research, market analysis and product development purposes;
- Providing the newsletter service;
- Answering questions and/or sending any requested information;
- Considering Users' spontaneous applications for job positions.

In any case, MIA shall not use the data for sending advertising material or offering discounts or invitations to join promotional campaigns of any kind, unless it has received the User's explicit consent acquired separately at a later date.

The collection of data and subsequent recording, submission, rectification and/or erasure thereof shall take place by computerised means.

MIA warrants that the personal data acquired shall be processed by taking appropriate technical and organisational measures to ensure the safe performance of the above operations.

#### 5. Data Processors

In providing its services, MIA uses Data Processors, pursuant to art. 28 no. 4 of the GDPR, that is, external parties entrusted with certain data processing activities.

MIA s.r.l. particularly uses the services of:

A) GSuite of Google Ireland Ltd. to:

- Back-up the data received by email on Google Cloud;
- Send and receive emails using the Gmail business service.

B) HubSpot of HubSpot Inc. to:

- Provide the newsletter service;
- Provide the instant messaging service;
- Store Users' personal data

C) QZR s.r.l. to:

- Manage [www.mia-platform.eu](http://www.mia-platform.eu) as system administrator.

D) ICTandStrategy s.r.l. to:

- Manage some HubSpot functions as system administrator.

For further information, please send an email to [privacy@mia-platform.eu](mailto:privacy@mia-platform.eu).

## 6. Storage period for personal data

The personal data referred to in art. 3 and listed below are stored for the period of time detailed below. A distinction is made between:

Browsing data: stored for a maximum period of XX and then immediately erased. For further information, please refer to the Cookies Section.

Use of forms (for the free download of technical documents): data shall be stored until the purpose for which they were provided has been achieved or for a maximum period of twelve (12) months since the most recent interaction with MIA.

Request for information (by email or instant messaging service): data shall be stored until the purpose for which they were provided has been achieved or for a maximum period of thirty (30) days since the most recent interaction with MIA.

Spontaneous application for a job position: data shall be stored until the purpose for which they were provided has been achieved or for a maximum period of one (1) year from the date of receipt of the CV by the User.

Data are stored both on servers located within the European Union and on servers located in the United States of America. Data are transferred using HubSpot services.

For further information on this subject, please send an e-mail to [privacy@mia-platform.eu](mailto:privacy@mia-platform.eu).

MIA ensures the definitive erasure of the aforementioned data.

## 7. Social Media and links to other sites

MIA uses certain social media channels to communicate with the public: LinkedIn, Instagram and Vimeo.

Users can find the button for sharing content on these social networks on [www.mia-platform.eu](http://www.mia-platform.eu).

Social platforms such as LinkedIn, Instagram and Vimeo save Users' data in cloud on servers that may be located outside the European Union and use their own cookies to recognise Users who are browsing after having logged into their accounts.

MIA has made no agreements with the companies that run the aforementioned platforms and has no control over how the data of Users who have logged in are used. Therefore, MIA invites Users to read the privacy policy adopted by LinkedIn, Instagram and Vimeo.

Users are informed that certain Vimeo videos may be viewed directly on the MIA website. In this case, cookies or other tracking systems may be used. To avoid tracking, Users may change their preferences at any time by clicking on the Cookies button on the [www.mia-platform.eu](http://www.mia-platform.eu) footer.

## 8. Cookies

Please refer to the Section on the use of cookies.

## 9. Erasure and other User rights pursuant to the GDPR

Users, at any time, may exercise the right to:

- A. Obtain confirmation as to whether or not personal data concerning them are being processed;
- B. Obtain information about the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed and, where possible, the period of storage;
- C. Request from the Data Controller access to personal data and the rectification or erasure of personal data or restriction of processing of personal data concerning them or to object to such processing, as well as the right to data portability;
- D. Lodge a complaint with the supervisory authority.

In order to exercise the aforementioned rights, Users shall send a written request to [privacy@mia-platform.eu](mailto:privacy@mia-platform.eu). The request will be processed within thirty (30) business days from its receipt.

## 10. Data Protection Officer

The Data Protection Officer is:

Simone Messaggi

MIA s.r.l.

Registered office:

Via Carroccio, 16,  
20123 Milan, Italy

Operating offices:

Via Carlo Imbonati, 18  
20159 Milan, Italy

[privacy@mia-platform.eu](mailto:privacy@mia-platform.eu)

# Cookies

As Data Controller, MIA uses cookies for the correct operation of its website [www.mia-platform.eu](http://www.mia-platform.eu) and to make it easy for Users to browse its website.

MIA processes the data collected by cookies according to art. 6 paragraph 1 letter a) (consent from Users to enable them); (b) (performance of a contract); (f) (MIA's legitimate interest) of the GDPR. The period of storage for such data is shown in the Cookies Table or in the privacy policy on third party cookies which may be accessed by clicking on the relevant hyperlink.

By browsing the website and based on the consent given, Users agree that certain personal data regarding them which have been collected may be transferred outside the European Union.

## 1. What are cookies?

Cookies are portions of code installed in the browser that help MIA provide browsing services on [www.mia-platform.eu](http://www.mia-platform.eu), according to the purposes described in this Policy in the above Section.

Some of the purposes for which Cookies are installed may also require the User's consent: in this case, the User's consent may be withdrawn freely at any time by clicking on the Cookies button on the website footer.

## 2. What type of cookies does the MIA website use?

This website uses the following cookies:

Technical cookies: they ensure the correct use of website content;

Performance cookies: tool for the anonymous and aggregate analysis of Users' behaviour on the website. Although these cookies do not identify the User, they are able to detect, for example, if the same User logs in again at a different time;

Profiling cookies: used to promote offers in line with Users' needs.

Some of the cookies on this website are third-party cookies, as shown in the Cookies Table.

## 3. Enabling and disabling cookies

Since some of the performance cookies and profiling cookies of MIA and/or third parties are not essential for the proper operation of the website, Users who have given their consent to enable the optional cookies specified above may, at any time, change or withdraw their consent to the use of optional (own or third-party) cookies by clicking on the Cookies button on the [www.mia-platform.eu](http://www.mia-platform.eu) footer.

Flag	Type of cookies	Data Processor	Period of storage	Purposes
Compulsory	Technical Cookies	MIA srl QZR srl	Session	Ensure correct operation of website.
Optional	Performance cookies	MIA srl QZR srl <a href="#">Google LLC</a> <a href="#">Hotjar Ltd</a> <a href="#">Vimeo Inc</a>	Variable	Optimise the website and User's browsing experience.
Optional	Profiling cookies	MIA srl QZR srl <a href="#">Google LLC</a> <a href="#">Hubspot Inc</a> <a href="#">LinkedIn Corporation</a> <a href="#">Instagram Inc</a>	Variable	<ul style="list-style-type: none"> <li>- Share website content with other users (social media)</li> <li>- Propose advertising messages in line with Users' on-line behaviour and interests</li> <li>- Propose personalised content and information on specific Users' preferences.</li> </ul>

## Newsletter

Information is given below on the processing of personal data that you have voluntarily disclosed to us online in the form available on [www.mia-platform.eu](http://www.mia-platform.eu) or at an event you personally attended, which is essential for providing the newsletter service to you.

### 1. What data do we ask you for?

MIA always asks you for your email address, which is common personal data. MIA may also request the following additional common personal data from you:

- Name;
- Surname;
- Job position;
- Company.

### 2. How do we use your data?

MIA s.r.l. processes all your personal data specified above in accordance with art. 6, paragraph 1, letters a), b), f) of the GDPR.

Your data are used to send you our e-newsletter periodically (no less than every two months) and to keep you fully updated on: Mia-Platform product developments; news about our activities; training events; deeper insights that can be downloaded (pdf file) free of charge.

MIA will not use your data to send you any advertising material or to offer you any discounts or invite you to join any promotional campaigns of any kind.

We inform you that your personal data may be collected manually (by filling out a paper form) or using computerised means. Subsequent recording, submission, rectification and erasure operations shall be carried out using computerised means.

MIA warrants that the personal data you provide shall be processed by taking appropriate technical and organisational measures to ensure safe operations: for further information, please write to [privacy@mia-platform.eu](mailto:privacy@mia-platform.eu).

### 3. Who helps us to process your data?

MIA uses Data Processors to provide this service, pursuant to art. 28 of the GDPR, that is, external parties to whom we entrust certain activities relating to the processing of your data.

In this regard, we would like to point out that our newsletter service is managed on HubSpot, a marketing platform also used to send newsletters, owned by HubSpot Inc. and based in the United States of America.

HubSpot allows us to receive information about who opens the newsletters and clicks on the links. MIA uses this information for the sole purpose of understanding which content is of greatest interest to Users receiving the newsletters.

By agreeing to receive our newsletter, you agree to the storage of your email address on HubSpot Inc.'s Servers and to the transfer of your data referred to in point 3 above to the United States of America. [Here](#) is the link to HubSpot's Privacy Policy.

In addition, MIA uses the GSuite services of Google Ireland Ltd, to:

Back-up your data on Google Cloud;

Send and receive emails using the Gmail business service.

For further information, please send an email to [privacy@mia-platform.eu](mailto:privacy@mia-platform.eu).

#### **4. For how long and where do we store your data?**

Your data will be stored as long as you decide to continue to receive our newsletter. We remind you that you can unsubscribe at any time by clicking on the Unsubscribe button. Subject to the provisions set out in point 3 - transfer of data to the USA via HubSpot - your data shall be stored on servers located within the European Union: for further information on this subject, please send an email to [privacy@mia-platform.eu](mailto:privacy@mia-platform.eu).

When you unsubscribe, Hubspot will inform MIA that the newsletter has been unsubscribed successfully.

#### **5. Erasure and your other rights under the GDPR**

Pursuant to articles 15 – 22 of the GDPR, you may exercise the following rights at any time:

- A. The right to obtain confirmation as to whether or not personal data concerning you are being processed;
- B. The right to obtain information about the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed and, where possible, the period for which the data will be stored;
- C. The right to request from the Data Controller access to the personal data and the rectification or erasure of personal data or restriction of processing concerning you or to object to such processing, as well as the right to data portability;
- D. The right to object at any time to processing of personal data, including for direct marketing purposes;
- E. The right to object to an automated decision-making process concerning individuals, including profiling;

- F. The right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;
- G. The right to lodge a complaint with a supervisory authority.

You may exercise your rights by sending a written request to: [privacy@mia-platform.eu](mailto:privacy@mia-platform.eu).  
Your request will be processed within thirty (30) working days from its receipt.

## 6. Links to other sites

MIA informs you that this privacy policy does not apply to other websites and on-line pages or services that can be reached via hyperlink published at the bottom of the newsletter. We invite you, therefore, to view the privacy policy of these linked sites.

## 7. Data Protection Officer

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Simone Messaggi

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