

Banca Mediolanum API Portal – Notice on the processing of personal data

Introduction

This Data Processing Notice describes how Cedacri S.p.A., via del Conventino n. 1, 43044 Collecchio (PR) – Italy (“Cedacri”), as *controller* within the meaning of the General Data Protection Regulation (“GDPR”), collect and process your personal data when using the Banca Mediolanum API Portal, starting from your Registration.

Personal Data actively provided by you during the Registration

By signing up to Banca Mediolanum API Portal you are providing registration data (“Registration Data”), such as your organization’s name, your name, email address and telephone number. The collection of the Registration Data is necessary to administer your access to and improve your interactions with the Banca Mediolanum API Portal, to verify your identity, to create a user account and to provide the services to you.

The legal basis for the processing of such Registration Data is the contract on the use of the Banca Mediolanum API Portal concluded with you. The provision of that Registration Data is compulsory. If you do not provide the Registration Data, you cannot use the API Portal.

When you apply for the API Partner Network we ask you to provide:

- Username
- Contact Person Name
- Contact Person Surname
- Contact Phone
- Contact Mail (corporate email)
- Company’s Corporate Name

The collection of these data is necessary to verify your identity, to provide services to you offered within the API Partner Network including the communication with you.

Use of cookies

A cookie is a small text file that is stored by your browser on your computer's hard drive. On each subsequent visit to the website, the browser searches for cookies. If the browser finds cookies, it sends the information stored by the cookie to the website. The website downloads cookies on your computer, tablet or mobile phone which are strictly necessary for the functioning of the website, such as cookies which ensure that you can retrieve information on the website quickly, and cookies which are strictly necessary to provide a service which has explicitly been requested by you, such as a cookie which remembers your cookie settings.

When you visit the Banca Mediolanum API Portal and its content, Cedacri collects standard log information and other details, gathered by using technical cookies. This type of cookies is used for the sole purpose of improve the service and the functionalities of the Banca Mediolanum API Portal.

Modalities of Data Processing

The processing of your personal data is carried out through IT and telematic tools, for the purposes identified above, in compliance with the provisions of current regulations regarding the protection of personal data. Personal data are stored and protected through appropriate technical and organisational measures, so as to guarantee a level of security appropriate to the risk of varying likelihood and severity for the rights and freedoms of natural persons, for the time necessary for the accomplishment of the mentioned purposes.

Within the limits of the processing activities carried out, Cedacri will not proceed with the transfer of personal data to third countries with respect to the European Union. The treatment will be carried out exclusively within the European Union.

Treatment activities are not supported by automated decision-making processes, including profiling, which produce legal effects on the applicant or which have a similar impact on his or her person.

How long do Cedacri keep your Personal Data?

Your Registration Data and Profile Data will be retained as long as necessary to provide you with the services, i.e. access to test data. Once our relationship has come to an end, we will store your Registration Data and Profile Data and then either delete your Registration Data and Profile Data or anonymize it, unless statutory retention requirements apply or if necessary to establish, exercise or defend a legal claim. This also applies to passively collected information, unless you object to the respective processing in which case we will erase or anonymize such information.

Identity and contact details of Cedacri

The Data Controller is Cedacri S.p.A., Via Del Conventino 1, 43044 Collecchio (Parma) - Italy.

Identity and contact details of Cedacri Data Protection Officer

Cedacri has designate its own Data Protection Officer (DPO). The DPO is available under the following address: Castellazzo Bormida (AL), via Liguria 529; and can be contacted for any clarification or request at the e-mail address: rpd@cedacri.it.

Persons that can process personal data

As a Data Controller, Cedacri informs that your personal data may be processed by persons that have been authorised by the data controller to carry out processing operations. These persons have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality in accordance with the provisions of Regulation (EU) 2016/679 (GDPR)

Personal data may be communicated to subjects to whom the communication is due for legal obligations, regulations or European regulations, such as the Guarantor for the protection of personal data, in case of inspections, and the police officers, in the course of investigations.

Personal data may also be communicated to the supervisors, located at the Cedacri Group offices. These subjects were invested with the appointment of persons in charge of processing personal data.

Personal data will not be disseminated.

Your rights

Pursuant to the applicable data protection law you may have the right: (i) to request access to your personal data, (ii) to request rectification of your personal data, (iii) to request erasure of your personal data, (iv) to request restriction of processing of your personal data, (v) to request data portability, (vi) to object to the processing of your personal data (including objection to profiling; also, other rights in connection with automated decision-making).

Please note that the above-mentioned rights might be limited under the applicable national data protection law. Below please find further information on your rights:

a) Right of access

You may have the right to obtain from Cedacri confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data. The access information includes – inter alia – the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipient to whom the personal data have been or will be disclosed.

You may have the right to obtain a copy of the personal data undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

b) Right to rectification

You may have the right to obtain from Cedacri the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement. You can change your Profile Data any time via your account.

c) Right to erasure (right to be forgotten)

Under certain circumstances you may have the right to obtain from Cedacri the erasure of personal data concerning you and we may be obliged to erase such personal data.

d) Right to restriction of processing

Under certain circumstances you may have the right to obtain from Cedacri restriction of processing your personal data. In this case the respective data will be marked and may only be processed by us for certain purposes.

e) Right to portability

Under certain circumstances you may have the right to receive the personal data concerning you, which you have provided to Cedacri, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from Cedacri.

f) Right to object

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by Cedacri. Cedacri can be required to no longer process your personal data. As Cedacri process and use your personal data primarily for purposes of carrying out the contractual relationship with you, Cedacri will in principle have a legitimate interest for the processing which will override your objection request, unless the objection request relates to marketing activities.

To exercise your rights, please contact us under the following email address: ufficioprivacy@cedacri.it

You also have the right to lodge a complaint with the competent data protection supervisory authority (Garante per la protezione dei dati personali italiano), according to the methods indicated by this authority.

For any clarification, please contact us under the following email address: ufficioprivacy@cedacri.it.