



PROCESSING DATA POLICY FOR APPLICANTS

According to the Clause 13 of the UE Regulation 2016/679 of the European Parliament and the Council (hereinafter "Regulation") on the Protection of the individuals concerning the processing of personal data

Dear participant,

hereby, Markas Ltd, as data Controller, informs you that the personal data you provide will be processed in accordance with the principles established by Regulation: lawfulness, transparency and fairness.

1. Purpose of processing and legal basis for processing

1. Markas Ltd will use your personal data (such as name, surname, e-mail and Social Security Number) for purposes related to the implementation of ideas on the Markas Lab Ideas portal. The ideas will be uploaded on the portal. In particular, the data will be processed for the following purposes: "processing is necessary for the performance of a contract to which the data subject is a party or in order to make provision at the request of the data subject prior to the conclusion of a contract" pursuant to Art. 6, co 1 of EU Reg. 679/16. The above mentioned personal data will be processed exclusively by authorized personnel in order to manage the portal properly.
2. Markas Ltd reserves the right to publish the ideas and the participants' name and surname on the website and on specific supports such as social media, trade magazines and initiatives. Furthermore, Markas Ltd reserves the right to contact participants for purposes related to the ideas uploaded to the Markas Lab Ideas portal. The data will only be processed with the explicit consent of the data subject, pursuant to art. 6, par. 1, letter a) of the Regulation.

2. Processing methods within Markas Lab Ideas

The data will be treated only with prior consent of the data subject, pursuant to art. 6 par. 1 letter a) of Reg. EU 679/16. Therefore, the data will be processed:

- on paper support, computer and/or telematic support;
- by authorized personnel;
- with appropriate technical and organisational protection measures to ensure data privacy and prevent access to unauthorized third parties

3. Personal Data storing period

For the purpose n.1, your personal data will be stored only for the time necessary to achieve the purposes of treatment above illustrated;

For the purpose n.2, your personal data will be processed until deletion. Data will be processed for as long as deemed useful for the purposes and duration of the current edition of Markas Lab Ideas, respecting the principles of proportionality and necessity and with exclusive reference to the above-mentioned purposes; or until revocation of consent by the data subject takes place or until the deletion request of the data on the part of the person concerned, in the manner provided for in Article 17 of the Regulation. Nevertheless, the right to object to the processing of personal data pursuant to Article 21 of the Regulation shall apply. In any case, data will be processed for a time frame of 5 years and after that period they will be deleted/anonymized.



4. Rights of the data subject

In accordance with current legislation, the data subject may request to obtain the access to the collected personal data at any time. The data subject has the right to withdraw his or her objection at whatever time. Therefore, the participant has the right to obtain from the Controller the rectification/modification of inaccurate personal data or the integration of incomplete personal data.

At any time, if the legal conditions are met, the participant has the right to object to the processing of collected personal data or to request the erasure or the limitation of the processing. In these cases, except for the data retention, the personal data, subject to processing limitation, may be processed only with the consent of the applicant, for the judicial exercise of a right of the owner, for the protection of the rights of a third party or for reasons of significant public interest. Markas Ltd will communicate any rectification or erasure of your personal data and a restriction of processing to all recipients to whom Markas Ltd has disclosed your personal data, unless this proves impossible or involves a disproportionate effort. Besides, the data subject also has the right to data portability to another controller.

Furthermore, if the data subject considers that her or him rights are violated, she/he has the right to file a complaint with the regulatory authority for data protection at any time: www.garanteprivacy.it

5. Data communication to third parties

The above mentioned personal data will be processed exclusively by personnel who is authorized by the Controller.

Solely for the above purposes, information of the participants may be disclosed to third parties who are in contractual relationship with the Controller and operate as Data Controllers (in accordance to Article 28 of Regulation), when the disclosure is deemed essential or functional to carry out our activities.

The collected data may be conferred to companies belonging to the Markas group only for the aforementioned purposes and processed by authorized personnel.

6. Data Controller

Markas Ltd, located in via Macello n. 61 (39100), Bolzano, Italy.

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7. Data Protection Officer

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