

▼ General data applicable to all privacy policy on the processing of personal data.

In this section you can find general information that applies to all the following privacy policy.

DATA CONTROLLER	CONTACT DETAILS	REFERENCE WEBSITE (if any)
Polytec Spa	mediarelations@bmgroup.com	https://polytec.bmgroup.com/
BM Group Holding S.p.A	mediarelations@bmgroup.com	https://bmgroup.com/en/
Polytec Intralogistics SRL	intralogistics@bmgroup.com	https://www.polytecintralogistics.com/en/
Centrale Idroelettrica Limentra Srl	/	/
Darnia Srl	/	/
Infinity Srl	/	/
Magriola Srl	/	/
Mommio Srl	/	/
PIG Hydroelectric Production Grosina Srl	/	/
SEA Servizi Energia e Ambiente Srl	/	/
Hydroalp Srl	info@hydroalp.com	https://www.hydroalp.com/en/
BM Elettronica Srl	mediarelations@bmgroup.com	/
BM Group Real Estate Srl	/	/
Consorzio Tecnologico Trentino Srl	/	/
Polytec Energy Srl	/	/
NYOX Srl	info@nyox.it	/
Hydrogreen Srl	/	/
CMF Energie Alternative Srl	/	/
Trentino Rinnovabili Srl	info@trentinorinnovabili.it	/
BM Wind Power srl	/	/
Tecnerga S.r.l.	tecnerga@tecnerga.com	/
Alpicapital S.r.l.	office@alpicapital.it	/
Polytec Development SRL	/	/

▼ Data recipients (by categories)

- **Authorized processors** duly instructed and required to maintain confidentiality.
- **Processors: service providers to whom the** data may be transmitted and who process the data on behalf of the Controller on the basis of a legally binding agreement guaranteeing the protection of personal data.
- **Autonomous data controllers** with sufficient guarantees to process data subject's data and with a valid legal basis for doing so (e.g. supervisory and control authorities and bodies, public or private entities that have right to request data, such as partners or suppliers).

▼ Legitimate interests pursued by the Controller

The Controller may use its legitimate interest as the legal basis for a specific purpose by balancing its rights with those of the data subject, taking into account his or her 'reasonable expectations' in view also of the existing relationship with the data controller. When processing is based on the legitimate interest of the Data Controller, it is not necessary seeking the Data Subject's consent for that specific purpose. The processing must not adversely affect the rights and freedoms of the Data Subject.

▼ Transfers to third countries pursuant to Articles 46, 47, 49 GDPR

Transfers to third countries will take place in accordance with current legislation:






- in countries recognised as safe by the EU Commission
- in countries with which Europe has international Data Protection Agreements
- with entities with which the Data Controller has entered into legally binding agreements providing adequate guarantees for the protection of the Data Subjects as required by law.
- if there are exemptions provided for:
 - consent of the Data subject
 - by necessity and not repetitively for types and amounts of data that allow it.

Further details on the location, appropriate safeguards and copy of the data can be requested from the Data Controller and/or will be provided in appropriate reference notices.




▼ Rights of Data Subjects

- To obtain confirmation or not about on going processing and eventually, obtain access to the data concerning the data subject
- To know the origin of the data processed by the Controller
- To verify the accuracy of the data concerning the Data Subject
- To oppose, for legitimate reasons, the processing
- To ask for possible integration, deletion, updating, rectification, blocking of personal data processed in violation of the law, portability

Enquiries may be addressed to the Data Controller via the contact details in the header or to the Data Protection Officer (DPO) at dpo@bmgroup.com.

	<p>Data Subjects also have the right to</p> <ul style="list-style-type: none"> • Be informed about violations that may present a high risk for those concerned • To lodge a complaint to the competent supervisory authority in the Member State where they usually reside or work or in the State where the alleged breach occurred.
	<p>▼ Consent</p> <p>The free, optional and revocable consent, of the data subject, when required, is collected for the processing of data for specific types of data or purposes.</p>
	<p>▼ Categories of personal data concerned</p> <p>For some of the Data Controller's activities, the personal information collected relates to common data (could include identification and contact data etc.) and sometimes to data belonging to special categories within the meaning of Article 9 of the GDPR (only where there is an appropriate legal basis, e.g. when the data subject has given consent or the Data Controller needs to exercise employment and social security law rights).</p>
	<p>▼ Additional purposes</p> <p>Where the Data controller intends to further process personal data for a purpose other than that for which it was collected, the Data Controller shall, prior to such further processing, provide the Data subject with information about that different purpose and any additional information relevant to the new purpose. Such disclosures may take place by updating the Information Notice and/or by contacting the person concerned.</p>
	<p>▼ Version and date</p> <p>V.03_June_2024</p>

Following the specific privacy policy:

	<p>Privacy policy for Forms on the Controller's Websites and/or for commercial communications.</p> <p>This privacy policy is supplementary to the general data and is given to the Data Subjects for the processing indicated. For these data processing, the Data Controller indicated on the front page is to be considered the Joint Data Controller.</p>
	<p>▼ Purposes and Legal Bases for Processing and Criteria for Determining the Data Retention period</p> <p>CONTACT FORMS AND COMMERCIAL COMMUNICATIONS VIA EMAIL</p> <p>The personal data subject to processing is provided by those who navigate on the site and interact with it. The data may concern identification and contact data (name, surname, e-mail address, etc.), special data (ex art. 9 GDPR) that may be spontaneously provided by filling in the contact form.</p> <p>The Data Subject's personal data are processed for</p> <ul style="list-style-type: none"> • Responding to requests or queries submitted by the User whose legal basis is the legitimate interest of the Controller to be identified in the reasonable expectation that the User expects his/her personal data to be used to respond to his/her contact request. If particular data are provided, the legal basis is consent confirmed by ticking the appropriate box. The data will be processed for the appropriate time to handle the request sent. • Send communications of a commercial nature, by means of the contact details provided through the form and/or at conventions, events, trade fairs, where the Data Subjects has provided their details (e.g. by means of a business card). These communications are aimed at promoting Products/Services provided by the Controller. The legitimate interest of the Data Controller in promoting its business with these types of Data Subjects is the basis of the processing given the reasonable expectations of the same. The processing will take place until the legitimate interest of the Controller ceases to exist or the Data Subject exercises his/her right to object.
	<p>▼ Version and date</p> <p>V.03_June_2024</p>



Totem, Newsletter and commercial communications Information

This privacy policy supplements the general data and is given to the Data Subjects for the processing indicated. The Data Controller is the Company that owns the site on which the Data Subject uses the Totem platform to book/manage visits or on which he/she fills in the form to receive commercial communications.



▼ Purposes and Legal Bases for Processing and Criteria for Determining the Data Retention period

The personal data being processed are provided by those interacting on the Totem platform.





The data subject's personal data are processed for:






- **Manage the entrances and exits of BM Group company locations via Totem** control and protection of the company environments and for the organisation of the exits. The legal basis on which the treatment is based is the legitimate interest of the Controller. The treatment will take place until the legitimate interest of the Controller ceases to exist or the Data Subject exercises the right to object.
- **Sending newsletters/commercial communications**, by means of the contact details provided through the **online form (Totem or other online collection mode) and/or** at conventions, events, trade fairs, where the data subject has provided their data. These communications are **aimed at promoting Products/Services provided by the Data Controller**. The legal basis on which the processing is based is the free, optional and voluntary **consent** provided by the Data Subject. The Data Subject's data will be stored by the Controller for a period of time equal to 12 months.



▼ Version and date

V.03_June_2024

	<p>Candidate privacy policy</p> <p>This privacy policy integrates the general data and is provided both to the Data Subject who propose their candidature for a job position to the Controller and for the specific personnel searches that may be promoted by the Controller also with the support of specialised subjects.</p> <p>For these processing, the Data Controller indicated on the front page is to be considered Joint Data Controller.</p>
	<p>▼ Purposes and Legal Bases for Processing and Criteria for Determining the Data Retention period</p> <p>The personal data of the person concerned are processed for the following purposes:</p> <ul style="list-style-type: none">• Examination of the candidate's profile and assessment and organisation of meetings and interviews• Preparation of recruitment documentation in case of positive evaluation• If necessary, to ascertain, exercise or defend the Controller's rights in or out of court <p>The applicable legal bases for processing identified by the GDPR are:</p> <ul style="list-style-type: none">• Performance of pre-contractual activities• Legal Obligations• Legitimate interest of the Controller for a better organisation of the activity (e.g. communication via the telephone number provided also via SMS) <p>The maximum period of data retention is 24 months after the data is provided. After the above-mentioned retention period has expired, the data will be destroyed, deleted or anonymised.</p>
	<p>▼ Source of origin of personal data</p> <p>Personal data are generally collected from the data subject but, in some cases, come from publicly accessible sources such as university databases or from agencies that process data in order to enable data subjects to receive job offers.</p>
	<p>▼ Version and date</p> <p>V.03_June_2024</p>

	<h3>Privacy policy on contractual relations</h3> <p>This privacy policy is supplementary to the general data and is given to the Data Subjects for the processing indicated.</p>
	<h3>▼ Purposes and Legal Bases for Processing and Criteria for Determining the of Data Retention period</h3> <p>The purposes of the processing are related to the presentation of the Controller's Services, business proposals (made or received), negotiation and conclusion of agreements.</p> <p>The legal bases for this processing are:</p> <ul style="list-style-type: none"> ▪ need for the exercise of pre-contractual and contractual measures ▪ consent (where necessary will be requested) ▪ legitimate interest of the data controller in a smoother organisation of its work. <p>Criteria identified for the data retention period linked both to compliance with current tax and administrative regulations as well as to keeping a profitable network of business contacts up to date and constant.</p>
	<h3>▼ Source of origin of personal data</h3> <p>Data not collected from the data subject come from publicly accessible sources such as company websites and are used in accordance with the principle of purpose.</p> <p>Social-media research may be conducted on certain professional figures to better identify their professional role.</p> <p>Certain Data Subjects/Referents may be introduced to the Controller through partners or collaborators.</p>
	<h3>▼ Contractual reference</h3> <ul style="list-style-type: none"> ▪ The Parties undertake that the personal data provided to each other shall be processed in compliance with the European Data Protection Regulation 2016/679 ("GDPR"), Legislative Decree No. 196/2003 of Italian Law ("Privacy Code") and subsequent amendments and additions, as well as within the limits set out below. <ul style="list-style-type: none"> ▪ Among the possible actions to be taken, should the type of relationship between the Parties concretise the case envisaged by Article 28 GDPR, is the signing of a Data Controller - Data Processor Agreement. The Parties undertake as of now to fulfil this possible obligation in an annex "DPA by article. 28 GDPR - Controller-Processor Agreement". ▪ The Parties mutually acknowledge, in their capacity as Data Controllers, that such personal data shall be processed for the purpose of entering into and executing the contractual relationship, i.e. for purposes strictly connected with and instrumental to the performance of any pre-contractual activities, the management of the contractual relationship (e.g. administrative and accounting activities), the fulfilment of contractual obligations as well as to comply with legal obligations, and shall be retained for the needs inherent to the performance of the Contract and in any case for the time necessary to fulfil the legal or regulatory obligations of the Data Controller. ▪ Data shall be processed only by the Parties, by subjects specifically authorised by them or by other third parties which the Parties themselves make use of, specifically appointed as External Data Processors, as well as by autonomous Data Controllers with an adequate legal basis (e.g. by the Authorities in case of request). Personal data shall not be subject to dissemination in the sense of publication unless the processing is provided for by consent of the Data Subject, by the nature of the Contract or by legal obligations to which the Data Controller is subject. ▪ This is without prejudice to the right of the Parties to possibly transfer the data outside the territory of the European Union, to those states that ensure the same level of security and guarantee in data processing as well as full compliance with the provisions of the GDPR.
	<h3>▼ Version and date</h3> <p>V.03_June_2024</p>