

Information on the processing of the parties' personal data in mediation

Camera Arbitrale di Milano S.r.l., with registered office in Milan, Via Meravigli n. 9/b - 20123, C.F. 97425550155 and VAT no. 05121020969, as data controller (hereinafter, "Data Controller"), informs you pursuant to Regulation (EU) 2016/679 ("GDPR") and the current national legislation on the protection of personal data that your data will be processed in the following ways and for the following purposes:

1. Object of the processing

The Controller processes the following personal data that you have provided (or that have been communicated by third parties, **such as recruitment companies and/or employment agencies**) by filling in the mediation application or joining the mediation procedure (hereinafter, "Data" or "Personal Data").

The conduct of the mediation procedure may involve not only the processing of ordinary and common identification data of various kinds, but also the processing of particular Personal Data and/or data relating to criminal convictions and offences (as referred to in Articles 9 and 10 of the GDPR).

2. Purposes and legal bases of the processing

The purpose of the processing is to manage and carry out, through the **Mediation office** and the designated Mediator, in accordance with the Mediation Rules of the Chamber of Arbitration of Milan, the mediation procedure to the parties concerned.

More specifically, Personal Data are processed in order to:

- a) process the mediation request of the parties concerned
- b) designate the Mediator who will assist the parties in the mediation attempt
- c) ensure **the proper provision** of the service, through the management of the relevant stages of the proceedings
- d) fulfilling the consequent and related administrative, accounting, or fiscal legal obligations;
- e) carry out any third-party expert activities related to the specific type of dispute dealt with
- f) carry out all necessary internal and external communications.

The legal basis for the processing is Article 6(1)(c) and (e) GDPR for common data; Article 9(2)(g) GDPR for particular categories of data; and Article 10 GDPR for data relating to criminal convictions and offences, which refers to the performance of a task in the public interest (Article 6(1)(e) GDPR) and the fulfilment of a legal obligation (Article 6(1)(c) GDPR).

3. Method of processing

The processing of your Data is carried out, both in paper and computerised form, by means of the operations of collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your Personal Data is subject to electronic and possibly automated processing. Your Personal Data is protected in such a way as to minimise the risk of destruction, loss (including accidental loss), unauthorised access/use or use incompatible with the original purpose of collection. This is achieved by the technical and organisational security measures implemented by the Data Controller.

4. Storage of Data

Personal Data relating to the mediation service will be kept for 10 years following the end of the procedure. Once this period has expired, it will be definitively deleted, or anonymised for statistical purposes. This is without prejudice to any further retention obligations laid down by law.

5. Provision of data

The provision of Personal Data is necessary to initiate and continue the mediation procedure. If it is not provided, the procedure cannot take place.

6. Access to Data

Your Data may be made accessible for the above purposes to

- employees and/or collaborators of the Controller, in their capacity as data processors and/or internal data controllers and/or system administrators
- the Mediation office
- the other party to the mediation proceedings and their lawyers and technical consultants
- any **court-appointed technical consultants**;
- third parties who perform activities in outsourcing on behalf of the Controller and who will process the Data in their capacity as external data processors.

7. Communication of Data

Your Personal Data may be communicated, without your prior consent, to the Judicial or Administrative Authorities or to other public subjects entitled to request them in the cases provided for by law.

8. Transfer of Data

The Data Controller may transfer Data outside the European Union. To this end, in accordance with privacy regulations, the Controller assesses the impact of data transfers and adopts, if applicable, the most appropriate safeguards (e.g. adequacy decisions or standard contractual clauses).

9. Source of Personal Data

Data that is not collected directly from the data subject shall, as a rule, be collected from the party initiating the mediation procedure.

10. Rights of the data subject

The Data Controller informs you that, as a data subject, **if the limitations provided for by law do not apply, you have the right to**

- obtain confirmation of the existence or otherwise of your personal data, even if not yet registered, and that such data be made available to you in an intelligible form;
- obtain an indication and, where appropriate, a copy of: a) the origin and category of the personal data; b) the logic applied in the event of processing carried out with the aid of electronic instruments; c) the purposes and methods of processing; d) the identification details of the data controller and data processors; e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them, in particular if they are recipients from third countries or international organisations; e) when possible, the data storage period or the criteria used to determine this period

- to obtain, without undue delay, the updating and rectification of inaccurate data or, when interested, the integration of incomplete data
- obtain the deletion, transformation into anonymous form or blocking of data: a) processed unlawfully; b) no longer necessary in relation to the purposes for which they were collected or subsequently processed; c) if the consent on which the processing is based is revoked and there is no other legal basis, d) if you object to the processing and there is no overriding legitimate reason to continue processing; e) in the event of compliance with a legal obligation; f) in the case of data relating to minors. The Data Controller may refuse to erase data only in the event of: a) exercise of the right to freedom of expression and information; b) fulfilment of a legal obligation, performance of a task carried out in the public interest or exercise of public authority; c) reasons of public health interest; d) archiving in the public interest, scientific or historical research or for statistical purposes; e) exercise of a right in a court of law;
- obtain the restriction of processing in the event of: a) contestation of the accuracy of personal data; b) unlawful processing by the Data Controller to prevent their deletion; c) exercise of a right of the Data Controller in court; d) verification of whether the Data Controller's legitimate reasons prevail over those of the data subject;
- to receive, where the processing is carried out by automatic means, without hindrance and in a structured, commonly used and readable format the personal data concerning you in order to transmit them to another data controller or - if technically feasible - to obtain direct transmission by the data controller to another data controller
- object, in whole or in part, on legitimate grounds relating to your particular situation, to the processing of personal data concerning you
- to lodge a complaint with the Data Protection Authority.

In the aforementioned cases, where necessary, the Controller shall inform the third parties to whom your personal data is communicated of any exercise of your rights, except in specific cases (e.g. when such fulfilment proves to be impossible or involves a manifestly disproportionate use of means compared to the right protected).

11. Procedures for exercising rights

You may exercise these rights at any time

- by sending a registered letter with advice of receipt to the Controller's address;
- by sending an e-mail or PEC to camera.arbitrale@legalmail.it.

12. Data Controller, Data Protection Officer and Data Processor

The data controller is Camera Arbitrale di Milano S.r.l., with registered office in Milan, Via Meravigli no. 9/b - 20123, Tax Code 97425550155 and VAT no. 05121020969.



risoluzione delle controversie

The Data Controller has also appointed a Personal Data Protection Manager who can be contacted by sending an email to dpo.camarb@mi.camcom.it.

The updated list of data processors, processors and system administrators, on the other hand, is kept at the Data Controller's head office.

Milan, 01 August 2022

Milan Chamber of Arbitration S.r.l.