



**PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA OF CO-OWNERS AND TENANTS
PURSUANT TO THE FEDERAL ACT ON DATA PROTECTION (FADP) AND THE EUROPEAN GENERAL DATA PROTECTION
REGULATION (GDPR)**

1. DATA CONTROLLER

Immobiliare Mantegazza SA, represented by its Legal Representative pro tempore, with registered office at **Riva Paradiso 2, 6902 Paradiso**, in its capacity as Data Controller, hereby informs you that your personal data will be processed in accordance with the Federal Act on Data Protection (FADP) and, where applicable, Regulation (EU) 2016/679 (GDPR).

The processing will be carried out in compliance with the principles of fairness, lawfulness, proportionality, and transparency, as well as in protection of your privacy and your rights.

2. PURPOSES OF PROCESSING

Your personal data will be processed for purposes strictly related to condominium management and administration, as well as for the fulfilment of obligations arising from co-ownership or tenancy agreements.

In particular:

- management of communications and condominium meetings;
- fulfilment of tax, accounting, and legal obligations;
- execution of collections and payments;
- protection and defence of the Controller's rights in judicial or extrajudicial proceedings.

3. LEGAL BASIS AND JUSTIFYING GROUNDS / PRINCIPLES OF LAWFULNESS

Under the FADP:

- processing is carried out in accordance with the principles of lawfulness, good faith, and proportionality (Art. 6 FADP);
- for sensitive personal data or personality profiles, a justification is required, which may consist of consent, a legal obligation, or an overriding private or public interest (Art. 31 FADP).

Under the GDPR, where applicable, processing is based on the following legal grounds (Art. 6 GDPR):

- performance of contractual or pre-contractual obligations;
- compliance with legal obligations (e.g., tax and accounting);
- legitimate interest of the Controller (Art. 6(1)(f)), for the management and protection of the relationship;
- explicit consent, where required (particularly for special categories of data pursuant to Art. 9 GDPR).

4. PROCESSING METHODS

Processing will be carried out by paper and/or electronic means, by the Controller, by authorised persons, or by external processors, adopting appropriate technical and organisational measures to ensure confidentiality, integrity, and availability of data.

Data will not be subject to profiling or exclusively automated decision-making.

5. CATEGORIES OF PERSONAL DATA PROCESSED

The processed data may include:

- identification and contact data (name, surname, address, telephone, e-mail);
- contractual and administrative data (bank details, property-related information, debtor/creditor positions);
- any sensitive personal data (under the FADP) or special categories of data (under the GDPR), if provided by the data subject (e.g., health data, religious beliefs, criminal proceedings). In such cases, processing will only take place where strictly necessary and always in compliance with legal provisions, with adequate security measures to ensure confidentiality and protection.

This may include, for example:

- data relating to religious, philosophical, or political opinions or activities;
- health-related data;
- lifestyle habits or data concerning private life;
- data relating to racial or ethnic origin;
- data uniquely identifying a natural person;
- data concerning administrative or criminal proceedings and sanctions;
- data relating to social welfare measures.

6. NATURE OF DATA COLLECTION AND CONSEQUENCES OF FAILURE TO PROVIDE DATA

The provision of your personal data is necessary to enable the performance of the contract, the provision of the requested services, and

Immobiliare Mantegazza SA

Riva Paradiso 2 – Casella Postale 6902 Lugano 2 Caselle
Tel +41(0)91 960 54 54 – Fax +41(0)91 960 54 50 – info@mantegazza.ch – www.mantegazza.ch



compliance with related legal obligations.

Failure to provide the required personal data will result in the impossibility, in whole or in part, to pursue the contractual relationship or to provide the requested services.

7. DATA RETENTION PERIOD

The Controller, its Processors, and authorised staff will process your personal data for the time strictly necessary to achieve the purposes set out in this notice.

In particular, data will be retained:

- for the entire duration of the contractual relationship and/or assignment;
- subsequently, for up to 10 years after the termination of the relationship, where required or necessary under applicable regulations (e.g., accounting, tax, or statutory limitation).

After these periods, data will be deleted, anonymised, or stored in a form compatible with legal obligations and for archiving in the public interest, scientific or historical research, or statistical purposes, always in compliance with FADP and GDPR security measures.

8. DISCLOSURE AND DATA RECIPIENTS

For the purposes described in this notice and for the performance of the contract, your personal data may be disclosed to:

- natural or legal persons, such as legal, administrative, and tax advisors, audit firms, couriers and forwarding agents, data processing centres, IT consultants, and service providers, where such disclosure is necessary to fulfil the above purposes;
- banks for the management of collections and payments;
- factoring companies, debt collection agencies, or entities engaged in related activities;
- suppliers, collaborators, and employees of the Controller, expressly authorised within the scope of their duties.

Personal data will be stored by the Controller and its appointed Processors and processed exclusively within Switzerland. Any transfers to EU/EEA countries will take place on the basis of the reciprocal adequacy decision between Switzerland and the EU. If it becomes necessary to transfer data abroad, this will only be to countries ensuring an adequate level of protection or subject to the adoption of appropriate safeguards, in accordance with the FADP and Arts. 44 et seq. GDPR.

9. DATA SUBJECT RIGHTS

Pursuant to the Federal Act on Data Protection (FADP), you may exercise your rights with respect to the Controller at any time by contacting us at the details provided below:

Phone: **+41(0)91 960 54 54**

E-mail: davidepianca@mantegazza.ch

Postal address: **Riva Paradiso 2 - Casella Postale 6902 Lugano 2 Caselle**

You have the right to:

- access your personal data and obtain a copy;
- obtain rectification or updating of inaccurate or incomplete data;
- request the erasure of data no longer necessary or unlawfully processed;
- restrict processing in specific cases provided for by law;
- request the portability of your data to yourself or to third parties, if technically feasible (Art. 28 FADP and Art. 20 GDPR);
- object to processing for legitimate reasons or for direct marketing purposes.

If processing is based on consent, you may withdraw it at any time, without affecting the lawfulness of processing carried out before withdrawal.

You retain the right in Switzerland to lodge a complaint with the [Federal Data Protection and Information Commissioner \(FDPIC\) \(www.edoeb.admin.ch/en\)](http://www.edoeb.admin.ch/en).

Where the GDPR applies, you also have the right to lodge a complaint with the competent Supervisory Authority in the EU Member State where you reside or work, or with the [European Data Protection Supervisor \(EDPS\) \(www.edps.europa.eu/en\)](http://www.edps.europa.eu/en).

[Additional Information](#) | [Amendments](#) | [Entry into Force](#)

The Controller reserves the right to amend or update this notice. Any update will be made available to data subjects, indicating the effective date.

Last updated: 27 March 2026

Immobiliare Mantegazza SA

Riva Paradiso 2 – Casella Postale 6902 Lugano 2 Caselle
Tel +41(0)91 960 54 54 – Fax +41(0)91 960 54 50 – info@mantegazza.ch – www.mantegazza.ch