



**PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA – ELECTRONIC ACCESS CONTROL SYSTEM (eCLIQ)
PURSUANT TO THE FEDERAL ACT ON DATA PROTECTION (FADP) AND THE 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**, acting as the Data Controller, informs data subjects that, in compliance with the Swiss Federal Act on Data Protection (FADP) and, where applicable, Regulation (EU) 2016/679 (GDPR), their personal data will be processed in accordance with the aforementioned legislation, in observance of the principles of fairness, lawfulness, proportionality, and transparency, while safeguarding confidentiality and the rights of data subjects.

2. PURPOSES OF THE PROCESSING

Your personal data, collected through the electronic access control system (eCLIQ), are processed exclusively for the following purposes:

- to enable the management and control of access to the managed buildings;
- to protect movable and immovable property;
- to ensure the safety and security of individuals accessing the buildings;
- to prevent unauthorized access, particularly in sensitive areas (technical rooms, IT infrastructure, protected PPP areas and similar);
- to manage authorizations operationally (assignment, modification and revocation of your electronic key);
- to comply with any requests from judicial authorities or law enforcement agencies.

The system is not used to systematically monitor your activities, but solely for security and access management purposes.

3. LEGAL BASIS AND JUSTIFICATION / PRINCIPLES OF LAWFULNESS

Under the FADP:

- the processing is based on the overriding interest of the controller in ensuring the security of the buildings, the protection of persons and property, and the controlled management of access.

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

- legitimate interest of the data controller (Art. 6(1)(f) GDPR), consisting in the protection of building security and the prevention of unauthorized access;
- performance of contractual obligations (Art. 6(1)(b) GDPR), related to tenancy agreements or other legal relationships involving access to the buildings;
- compliance with legal obligations (Art. 6(1)(c) GDPR).

The Controller has carried out a balancing test of interests and has determined that the processing is proportionate and does not override the fundamental rights and freedoms of the data subjects.

For the protection of employees, the processing is carried out in accordance with Articles 328 of the Swiss Code of Obligations (CO) and 30 FADP.

In the event of requests from judicial bodies or authorities (Police, Courts, etc.), the relevant legal provisions shall apply.

4. METHODS OF PROCESSING

The processing is carried out through the electronic access control system (eCLIQ) installed in the buildings managed by Immobiliare Mantegazza SA.

The system is predominantly offline and allows the management of authorizations through programmable electronic keys assigned to users.

Access-related data are recorded on the devices and made available through authorized management software.

The data are processed exclusively by authorized personnel or designated external processors, adopting appropriate technical and organizational measures to ensure confidentiality, integrity, and security.

The processing does not involve profiling or automated decision-making processes.

5. CATEGORIES OF PERSONAL DATA PROCESSED

Through the access control system, the following data may be processed:

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



- identifier of the assigned electronic key;
- identification data of the user associated with the key;
- access records (date, time, and access point);
- any unauthorized access attempts;
- technical information necessary for the operation of the system.

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

The provision of your personal data is necessary to enable the assignment and management of the electronic key and to allow you access to the areas of the building for which you are authorized.

Any refusal to provide the requested data or to accept the processing will result in the impossibility of assigning you access credentials and, consequently, of accessing the areas controlled through the electronic system.

The processing of access-related data is carried out strictly within the limits necessary to ensure security and the proper use of the infrastructure.

7. DATA RETENTION PERIOD

The Controller, the Processors and the persons authorized to process the data (appointed personnel) will process your personal data for the time strictly necessary to achieve the purposes indicated in this notice.

In particular, the data will be retained:

- for the entire duration of the contractual relationship and/or assignment;
- subsequently, for a maximum period of 10 years following the termination of the relationship, where required or permitted by applicable regulations (for example in accounting, tax or statutory limitation matters).

Any extensions may be required in the presence of:

- legal obligations;
- provisions of competent authorities;
- the need to establish, exercise or defend a right in judicial proceedings.

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

8. DATA DISCLOSURE AND RECIPIENTS

The personal data may be accessed exclusively by:

- employees of Immobiliare Mantegazza SA expressly appointed and authorized;
- authorized external processors designated for the management and/or maintenance of the system;
- competent authorities, in cases provided for by law or upon request by public bodies.

Personal data will be stored by the Data Controller and its appointed Processors and primarily processed 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 Data 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 the processing of your data on grounds relating to your particular situation.

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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

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