



INFORMATION NOTICE ON PERSONAL DATA PROCESSING

dpconsulenze S.r.l. hereby provides information on the on its personal data processing modalities, pursuant to Art. 13 of Regulation no. 2016/679/EU of the European Parliament and Council of 27 April 2016, General Data Protection Regulation (**GDPR**).

1) DATA CONTROLLER

The Data Controller is dpconsulenze S.r.l. (hereby “**dpconsulenze**”) having registered offices in 20132 Milan, via Pordenone, 17, e-mail address: privacy@dpconsulenze.com.

2) TYPES OF DATA PROCESSED

The following types of personal data (**Data**) referring to you (**Data Subject**) or Third Parties you represent (**Third Parties which you represent**) will be processed as required on a case by case basis:

- (i) common data, personal details, identifying data, contact and bank details
- (ii) data relating to the employment or collaboration relationship
- (iii) any other data connected with the performance of the contractual relationship with dpconsulenze.

Should you provide us with Data of Third Parties you represent (for example personnel, collaborators, members of the Board of Directors or other Company boards) we request that you communicate this information notice to them.

3) PURPOSES AND LEGAL BASIS OF THE DATA PROCESSING

I) Your Data will be processed for the purposes of corresponding with you and Third Parties which you represent, to comply with contractual, administrative, accounting and tax obligations, as well as for the purposes of complying with legal obligations to which dpconsulenze is subject.

The Data processing for the purposes listed above is necessary as it is indispensable for the performance of the contract with dpconsulenze. Any objection, or partial objection, to the Data being processed will mean that the contract cannot be fully performed.

II) Your Data will be processed also for the promotion of dpconsulenze’s activities, including by means of newsletters, communications, information, and invitations to events. Data processing for such purposes is based on the consent of the Data Subject and is optional, with the result that



you and your Personnel may decide not to give your consent, or to revoke your consent at any time, by objecting to the on-going processing of the Data.

4) MODALITY OF PROCESSING

The Data have been collected, or will be collected, directly from you, or have been acquired from Third Parties you represent as a result of the contractual relationship with dpconsulenze.

The processing may be done manually, using hard copy material, electronically, with or without the aid of automated processes, with means able to memorize, manage and transmit the Data, and will include all operations necessary for the processing at issue, including the communication of such Data to persons or entities indicated at point 5).

The Data processing will not include any profiling activity or any activity aimed at taking decisions based merely on the automated processing of the Data.

The means adopted are appropriate to ensure the security and confidentiality of the Data.

5) COMMUNICATION TO THIRD PARTIES AND DATA PROCESSORS

The Data will be processed by employees of dpconsulenze, who act in compliance with specific instructions concerning data processing and confidentiality, as well as by service providers that dpconsulenze has appointed, or will appoint, as data processors and who provide adequate guarantees that the data will be processed in compliance with the terms of GDPR.

The Data may also be communicated to other companies in the Group to which dpconsulenze belongs, for the same purposes as indicated at point 3). These companies will process the Data using the same modalities as those set out at point 4).

An up-to-date list of data processors may be requested from the following e-mail address: privacy@dpconsulenze.com.

The Data will not be disseminated, but may always be communicated to judicial authorities, supervisory authorities, state bodies and agencies in compliance with legal obligations.

6) STORAGE AND TRANSFER OF THE PERSONAL DATA OUTSIDE THE EUROPEAN UNION

Your Data is processed through solutions which can include *cloud*, *housing* and *on premise* servers. The servers, which may be located either inside or outside of the European Union, may be available both to dpconsulenze and to third parties appointed as data processors.

The transfer of your data outside of the European Union will occur adopting the appropriate measures, such as the adoption of standard clauses approved from the European Commission (in accordance, for example, with the decisions n. 2004/915/EC and 2010/87/EU).



7) PERSONAL DATA STORAGE PERIOD

The Data will be processed and stored for the duration of the business relationship with dpconsulenze and after the termination of such relationship for the period of time for the limitation of action established by law, and however for a period of time not less than ten years imposed by law for the storage of accounting records.

8) DATA SUBJECT'S RIGHTS

You and, depending on the case, Third Parties you represent, may exercise the following rights:

- a) right of access: to obtain confirmation at any time that your Data is being processed and to receive information in relation to such processing;
- b) right of rectification: to obtain without undue delay the rectification or integration of any incorrect Data;
- c) right of erasure: to obtain without undue delay the erasure of your Data;
- d) right of restriction: to obtain that the processing of your Data be restricted merely to its storage;
- e) right of portability: to receive your Data in a structured, commonly-used and machine-readable format and to have your Data transferred to another data controller indicated by you;
- f) right of objection: to object to the processing of your Data.

You and Third Parties which you represent may contact dpconsulenze to exercise your rights under GDPR, sending a request to the following e-mail address privacy@dpconsulenze.com. Should you exercise any one of these rights, you will normally receive a reply within one month of receipt of your request.

With reference to the processing of your Data and to the exercise of your rights as Data Subject, you and Third Parties which you represent are entitled to make a complaint to "Garante per la protezione dei dati personali", Piazza di Monte Citorio no. 121 - 00186 Roma - www.gpdp.it - www.garanteprivacy.it.

Milan, May 25th 2018



RECEIPT OF INFORMATION NOTICE AND CONSENT FOR PROCESSING OF PERSONAL DATA

The Data subject acknowledges the receipt of the information notice on personal data processing, pursuant to Art. 13 of Regulation no. 2016/679/EU (GDPR).

Does the Data subject give consent to processing of his personal data referred to in points 2 (iii), 2 (iv) and 2 (v) for the purposes referred to in point 3 I) of the information notice?

An objection or partial objection to the processing prevents the performance of the contract services (such as, for example, the remote support as even the inadvertent visualization has to be considered a data processing).

YES NO

Does the data subject give the consent to processing of his personal data referred to in points 2 (i) e 2 (ii) for the purposes referred to in point 3 II) of the information notice?

YES NO