

PRIVACY NOTICE

Pursuant to article 13, Regulation (EU) 2016/679 (the '**Regulation**' or '**GDPR**')

1. WHO IS THE DATA CONTROLLER?

Gesis S.r.l., with registered office in Agrate Brianza (MB), Centro Direzionale Colleoni, Palazzo Astrolabio, P.IVA 00977960962, in the person of its *pro tempore* legal representative, is the Controller of your personal data ("**Gesis**" or the "**Controller**").

The Holder can be contacted by writing to the e-mail address privacy@studioteruzzi.it.

2. WHAT IS PERSONAL DATA?

Pursuant to the GDPR, personal data means: '*any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity*' (the '**Data**').

As part of the negotiation process, as well as for the conclusion of the contract that may be signed with the client company through your person, the Controller collects and processes the following data relating to you:

- personal and identification data (*e.g.*, first name, surname, date of birth, tax code, VAT number);
- contact data, such as address of residence or domicile, registered office, e-mail address, telephone number;
- bank details (*e.g.* IBAN code);
- company/firm, sector, job role, function;
- in general, any other information strictly necessary for the conclusion of the contract and/or fulfilment of contractual obligations or for ancillary or functional activities, including information potentially collected in the context of possible creditworthiness assessment and fraud prevention.

As a rule - except in cases where the provision of certain information is expressly provided for by law or is strictly necessary to be compliant with the legal obligations incumbent on the Data Controller, being therefore mandatory - the provision of your Data is entirely voluntary; however, in the event of a refusal to provide the Data required from time to

time, it will be impossible for the Data Controller, for example, to establish and/or continue the contractual relationship.

In any event, the Data Controller undertakes to ensure that the information collected and used is appropriate for the purposes set out below and that this does not lead to an invasion of your personal sphere.

3. PURPOSE OF PROCESSING AND LEGAL BASIS

a. Establishment, management and execution of the contractual relationship

The Data Controller shall process the Data listed above referring to you for the execution of pre-contractual services (*e.g.* (*e.g.*, in the event of a request for information prior to the conclusion of a possible contract), the performance and subsequent management of the contract with the company for which you are the contact person and for all activities ancillary thereto, including, by way of example, the ordinary administrative management of the contract, the performance of the services envisaged by the agreement, the issuing and payment of invoices, the registration and storage of the Data in order to keep evidence of your willingness to request the Service, the sending of communications with information content relating to the imminent expiry of the contract.

The relevant processing will take place in accordance with the condition of lawfulness set out in Article 6(1)(b) GDPR, the processing being necessary for the performance of a contract to which you are a party or for the performance of pre-contractual measures taken at your request.

b. Compliance with legal obligations

Your Data will be processed by the Data Controller for the fulfilment of legal obligations incumbent upon it (including those provided for under anti-money laundering legislation) in connection with pre-contractual checks, the establishment and management of the contractual relationship.

Where necessary, processing will be based on the condition of lawfulness set out in Article 6(1)(c) GDPR.

c. Defence of legitimate interests

The Data Controller processes the Data in order to pursue its legitimate interests (including in court).

The data processing is based on the legitimate interest of the Controller to defend its rights in accordance with Article 6(1)(f) GDPR.

4. TO WHO ARE YOUR DATA COMUNICATED?

Your data may be transferred to entities that Gesis uses to carry out activities necessary to achieve the purposes indicated and described in paragraph 3 above including external companies that offer Gesis IT services, specifically appointed as data controllers under Article 28, GDPR. In addition, where such communication is possible or required by law, your data may be communicated to other companies, competent Authorities or Public Bodies, which process them for their own purposes as autonomous data controllers.

The list of data processors can be requested by contacting the Data Controller at the contact details indicated in paragraph 1.

In any case, your Data will not be transferred outside the European Economic Area or disseminated.

5. HOW LONG IS YOUR DATA KEPT?

Your Data will be processed by Gesis for the entire duration of the contractual relationship and will be kept for a further period of 10 years following the termination of said relationship for any reason whatsoever. At the end of this period, the Data shall be deleted, except in the event of judicial or administrative verification requirements in progress at the date of expiry of the retention period.

6. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

In compliance with the provisions of Chapter III, Section I, GDPR, you can exercise the rights indicated therein and in particular:

- Right of access - The right to obtain confirmation as to whether or not personal data concerning yourself are being processed and in case obtain information, in particular about: the purposes of the processing, the categories of personal data processed and the period of storage, the recipients to whom the personal data may be disclosed (Article 15 of GDPR);
- Right to rectification - The right to obtain, without undue delay, the rectification of inaccurate personal data concerning yourself and to have incomplete personal data completed (Article 16 of GDPR);
- Right to erasure - The right to obtain, without undue delay, the erasure of your personal data, in the circumstances envisaged by GDPR (Article 17 of GDPR);
- Right to restriction of processing - The right to obtain the restriction of processing in the circumstances envisaged by GDPR (Article 18 of GDPR);

- Right to data portability - The right to receive the personal data concerning yourself which you have provided to the Controller in a structured, commonly used and machine-readable format, and to have those data transmitted to another controller without hindrance, in the circumstances envisaged by GDPR (Article 20 of GDPR);
- Right to object - The right to object to processing of personal data concerning yourself, unless legitimate grounds for the Controller continuing the processing exist (Article 21 of GDPR);
- Right of revocation of consent - You have the right to revoke your consent to the processing of your Data at any time, without prejudice to the lawfulness of the processing based on your consent prior to revocation;
- Right to file a complaint with the Authority - if the Controller refuses to comply with your requests to exercise the above rights, the reasons for such refusal will be provided. If applicable, you have the right to file a complaint as described in the following paragraph.

Please note that you may exercise the above rights simply by sending an e-mail to the e-mail address of the Controller.

The exercise of your rights as a data subject is free of charge pursuant to and within the limits of Article 12, GDPR.

7. HOW TO FILE A COMPLAINT

You have the right to file a complaint with the Italian data protection authority, Garante per la protezione dei dati personali. Information and contact details can be found on the authority's website www.garanteprivacy.it.