

## PRIVACY POLICY FOR CLIENTS OF CALENTI & PARTNERS S.R.L.

**Calenti & Partners S.r.l.** (Hereinafter, “**Company**” or “**the Data Controller**”), in its capacity as Data Controller wishes to inform you, pursuant to applicable legislation governing the protection of personal data, including European Privacy Regulation 679/2016 relating to the protection of personal data (“**Regulation**”), that the personal data provided by you when entering into relations with the Company and during the course of the agreement, shall be processed in accordance with applicable legislative and contractual provisions for the purposes of and in the manner set forth hereinbelow. In certain circumstances data may also be retained at third parties, where necessary, and always in accordance with applicable legislation.

### 1. Identity and contact information of the Data Controller

The Data Controller is Calenti & Partners S.r.l., having its registered office in Via Plinio n. 11, Milan.

### 2. Category of personal data, purpose and legal basis of processing

The Company may process:

- **identity and contact information:** name and surname or company name, tax ID or VAT number, residence or registered office, email address, telephone number;
- **tax data or data required for remitting or receiving payments.**

The above personal data is processed for the following purposes and subject to the following lawful conditions:

**a.** to comply with obligations arising under law and/or the agreement with the Company to which this policy is annexed, and in all cases so as to provide the consultancy and assistance requested; in such case the lawfulness of data-processing is based on the need to comply with legal obligations relating to the establishment and management of work relations (Article 6, paragraph 1, subpart (b) and (c) of the Regulation);

**b.** to deal with any disputes and to protect the Company’s rights; in such eventuality, the legality of processing is based on the need to pursue the Company’s lawful interests (Article 6, paragraph 1, subpart (f) of the Regulation);  
Your consent is not required for these purposes.

**c.** The data provided may also be processed in order to send newsletters, informational communications or for marketing purposes; in such eventuality the lawfulness of processing requires your consent (article 6.1, subparagraph a of the Regulation).

### 3. Manner of processing and type of data provided

Personal data shall be processed by the Company using computerised and hardcopy systems in accordance with tenets of fairness, good faith and transparency as provided for by applicable legislation governing the protection of personal data and in order to safeguard your confidentiality and your rights through the adoption of appropriate technical and organisational measures in order to ensure a level of security which is appropriate to the risk.

The provision and updating of your personal data is mandatory under applicable legislation (governing tax and other matters) or in order to perform the contractual agreement. Without such data, it will not be possible to initiate or – in certain circumstances – continue relations.

The provision of data for the purposes referred to in **point 2.c** is optional and failure to provide your data or withdrawal of your consent to the processing of your data shall not entail consequences to the contractual relations, but shall only render it impossible to process the data for the above-mentioned purposes.

### 4. Retention of data

All data referring to you shall be retained in accordance with civil law and fiscal obligations (for example the civil law obligation to retain accounts records and additional corporate correspondence for 10 years) and in all cases only for the

duration of the ongoing agreement. Once the agreement is terminated, in order to protect the Company's rights, the data shall be retained - so as to be accessible only if needed - for a period of time until the prescription period for any rights which you may claim against the Company, expires. This period varies according to the type of data and any interruption or suspension of the prescription period.

Should you allow the processing of your data for the purposes referred to in **point 2.c** this data shall be retained for no more than 24 months after the date on which it is provided.

#### 5. Recipients of data

Your data shall not be disclosed to others but, for the aforementioned purposes and in compliance with the principles informing the Regulation, it may be forwarded to: employees of the Company, its associates, consultants and outsourced professionals (chiefly, by way of non-limiting example: certified public accountants; communication agencies). In order to comply with legal duties, obligations arising under the contractual relationship or when requested by you, the data may be forwarded to public bodies or authorities.

#### 6. Transfer of data

Your data shall be retained at the Company's registered office and on its servers (both located in Italy), and on the servers belonging to communication agencies web platform located within the European Union and, under no circumstances shall it be transferred outside the European Union.

#### 7. Data Subject's Rights

With regard to the processing of the data described herein, the data subject may exercise his or her rights in accordance with applicable legislation governing the protection of personal data, including the right to:

- receive confirmation of the existence of your personal data and to access the contents of same (access rights);
- update, amend and/or correct your personal data (right of correction);
- request erasure of or limitations on the processing of data processed in breach of legislation including data which it is not necessary to retain for the reasons for which it is collected or otherwise processed (right to be forgotten and right to limitations);
- object to data processing grounded on legitimate interests (right to oppose);
- revoke consent, when given; such revocation of consent shall not prejudice the lawfulness of any processing based on consent provided prior to such revocation;
- file complaints with the supervisory authority in the event of breach of the provisions governing protection of personal data;
- receive copies of the data relating to the data subject in an electronic format when such data is provided within the context of an employment agreement (for example data relating to salaries, internal mobility services) and to request that this data be sent to another data controller (right to data portability).

In order to exercise these rights, at any time, you may contact the Company, sending your request to the following email address [privacy.emaitaly@ema-partners.com](mailto:privacy.emaitaly@ema-partners.com) or by means of registered mail with return receipt to the following address: Via Plinio n. 11, Milan.

The undersigned Mr/Ms \_\_\_\_\_ states he/she has reviewed the instant privacy policy in its entirety, provided pursuant to Art. 13 of European Regulation 697/2016.

Place \_\_\_\_\_ Date \_\_\_\_\_

The data subject's signature \_\_\_\_\_

The undersigned \_\_\_\_\_ provides his/her consent to the processing of his/her data for the purposes referred to in **point 2.c** above.

The data subject's signature \_\_\_\_\_