

Privacy Policy Statement under Art. 13 of EU Regulation No. 2016/679 – GDPR (General Data Protection Regulation)

The firm Vasapolli & Associati – Professional Partnership (hereinafter “V&A”), in accordance with the provisions of EU Regulation No. 2016/679 (hereinafter, called “the Regulation” or GDPR) on the protection of persons and other data subjects for the processing¹ of personal data, provides the following Privacy Policy Statement regarding personal data² and/or specific categories of personal data³ (hereinafter, “Data”) which are processed during the execution of the mandate assigned to it (hereinafter “Mandate”):

Data controller

The Data controller is Vasapolli & Associati – Professional Partnership, with office at Piazza Carlo Emanuele II No. 13, 10123 Turin, telephone no. 011/5611319, email privacy@vasapolli.it.

Purposes of the processing and provision of personal data

The Data, which can also be acquired through third parties, shall be processed both in out-of-court and court matters exclusively for the execution of the Mandate assigned to the company, and for the purposes that are connected and/or necessary to the execution of the same, without prejudice to obligation of confidentiality and professional secrecy, as well as to perform the requirements under Legislative Decree No. 231/2007 and related implementing regulations (hereinafter “Anti-Money Laundering Law”). The provision of these Data is optional; however, V&A may not be able to perform its Mandate if these Data are not provided.

Personal data and contact details may be used, without the consent of the data subject, to send institutional communications (such as, for example, newsletters, publications, studies, etc.) and invitations to events, seminars, round tables, conventions (also aimed at professional training) organized and managed by the Data Controller autonomously or in collaboration with third parties, identified from time to time in the invitations that will be sent in advance.) and invitations to events, seminars, round tables meeting, conferences (also aimed at professional training) organized and managed by the Data Controller autonomously or in collaboration with third parties, from time to time identified in the invitations that will be sent in advance, as well as any other type of informative material of a professional nature, drafted, edited or published by the Data Controller, on the basis of V&A's legitimate interest in establishing, maintaining and developing profitable and optimal professional relations with its clients and potential clients. The data subject has the right to object at any time to the processing of personal data concerning him/her carried out for such purposes.

Only personal and contact details may be used in sending institutional communications and event invitations in electronic forms in accordance with V&A's legitimate interest to maintain and develop business relationships with its clientele. The interested party may provide such Data according to his discretion and has the right to object to the processing of his data for said purposes at any time.

Data processing procedure

Data processing is carried out by persons specifically appointed to the task, in accordance with the provisions of the current legislations and principles of fairness, lawfulness and transparency, and uses an integrated computer system and paper documents to store, manage

and send such Data according to the provisions of Art. 32 of the Regulation. Access to personal data shall be given to V&A's professionals, collaborators and employees according to their respective functions, including administrative and secretarial ones.

¹ Under Art. 4 of the Regulation, “processing” means: “any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction”.

² Under Art. 4 of the Regulation, “personal data” means: “any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural 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 the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

³ Under Art. 9 of the Regulation, “special categories of personal data” means data that reveals “racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation”. Data that are considered as “special categories of personal data” may be processed only with prior and written consent at the end of this privacy policy statement.

Data storage period

In line with the principles of lawfulness, purpose limitation and data minimization under Art. 5 of the Regulation, the Data will be stored for a period of time needed to fulfill the purposes for which said Data is collected and processed, and will be stored for an additional period necessary to comply to legal obligations. In any case and in accordance to the Data Controller's legitimate interest, the collected Data may be stored until the fulfillment of said interests.

Disclosure and dissemination of personal data and their transfer abroad

The Data may be disclosed to Trend Srl, a company providing administrative and accounting services, and/or to professionals and collaborators and/or counterparties and relevant defence attorneys and/or persons who work in the same sector in which V&A operates and, in general, all persons and/or public and private entities where disclosure of the Data is necessary and appropriate so the Mandate may be carried out, as well as to comply with the Anti-Money Laundering laws.

The Data may be shown in the Firm's presentation documents for the public, including on websites, paper publications and through the press, in accordance with the provisions of applicable professional standards.

To the extent in which it is necessary to carry out the Mandate, the Data may be transferred to a subject in a third country or to an international organisation in the European Union (EU) or the European Economic Area (EAA).

The absence of permission to the disclosure of personal data may result into V&A's impossibility to carry out the Mandate. The Data will not be disclosed unless this is necessary to comply with the obligations required by the laws or regulations.

Right of the data subject

Under Articles 15 to 22 of the Regulation, at any time, the data subject has the right to

- ask for confirmation whether personal data regarding him are being processed or not;
- obtain information on the purpose of the data processing, categories of personal data, recipients or categories of recipients to whom personal data regarding him have been disclosed, and when possible, also their storage period;
- have data regarding him updated, rectified and erased;
- restriction of processing of his data;
- data portability⁴, or to receive data concerning him from a data controller in structured commonly-used and machine-readable format and send those data to another data controller without hindrance;
- object to data processing;
- object to automated individual decision-making, including profiling.
- ask the data controller for access to and rectification or erasure of personal data concerning him or restriction on the processing of the data or object to data processing, as well as data portability;
- withdraw consent to data processing, at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- lodge a complaint with a supervisory authority (www.garanteprivacy.it).

The data subject may exercise his rights by sending a written request to Vasapolli & Associati, at its registered address or at the following email address privacy@vasapolli.it.

⁴ The right to data portability allows data subjects to receive personal data concerning them that they have provided to a data controller in a structured, commonly-used and machine-readable format and transmit those data to another controller.