

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.

Data storage period

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.

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 professionals and/or 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 Vasapoli & Associati, at its registered address or at the following email address email privacy@vasapoli.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.

Consent to data processing
(for natural persons)

The undersigned:

Surname and Name

Place and date of birth

Registered address Street..... no.

Municipality..... ZIP Code Country

Profession/Business activity

Tax Code

Identity document (*attach a copy*): Identity card Driver's Licence Passport Other

no. Issuing authority date

Acting in his/her capacity as: Owner Other

of Sole-proprietorship business

of Professional activity

registered address

VAT No.

hereby states to have read the Privacy Policy statement under Art. 13 of the EU Regulation No. 2016/679, and accepts its contents, and with regard to the Data that have been provided before, these include data that are considered special data categories, as well as for the Data that will be provided henceforth

gives consent does NOT give consent

to data processing by V&A for the execution of the Mandate assigned to it according to methods and terms contained in the Privacy Policy statement

gives consent does NOT give consent

to the disclosure of the Data to subjects that have been specified in the previous statement

gives consent does NOT give consent

to receiving institutional communications from V&A and invitations to events (such as newsletters, publications, studies, etc.) and invitations to events, seminars, round tables meeting, conferences (including those aimed at professional training) organized and managed by V&A independently or in collaboration with third parties, as identified from time to time 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 V&A

Signature

Name and Surname

Place and date

Anti-Money Laundering Compliance

V&A is required to comply under Legislative Decree no. 231/2007 to prevent using the financing system for money laundering and terrorist financing.

Specifically, these obligations include:

- i) Identification of clients, verification of the data that has been acquired during the performance of the professional activity, storing and recording the information in anti-money laundering paper archives;
- ii) Reporting suspicious transactions to supervisory authorities;
- iii) Reporting any violation to supervisory authorities regarding the limitation on the use of cash and on the bearer's securities.

In order to carry out client due diligence, V&A is required to do the following activities upon receipt of the mandate:

- Verify the client's identity based on the identity document of the natural person who gave the mandate;
- Obtain identification information of the said natural person, as well as any other necessary information in compliance with the anti-money laundering requirements;
- Identify and verify the identity of the beneficial owner, if any, as defined in the Information Document as well as in the Information Document's closing notes ^(A);
- Verify if the client is a politically-exposed person as defined in the Information Document's closing notes ^(B);
- Obtain information on the purpose and intended nature of the professional services to be provided;
- Carry out regular monitoring activities during the business relationship or performance of the professional service.

In case of failure to provide or late submission of necessary documents to carry out said verification activities, V&A shall not be allowed to carry out the mandate, as required by the Anti-Money Laundering Law.

The data and information that have been recorded under the Anti-Money Laundering Law shall be used for tax purposes in accordance with relevant laws.

The requirement to report suspicious transactions (ii), whose violation shall be subject to criminal sanctions, must be fulfilled by V&A, where appropriate, as soon as possible and will be treated by V&A as confidential, except if disclosure thereof is required by relevant supervisory authorities.

The national authorities which supervise the adherence to the legislation are the Ministry for the Economy and Financial Affairs, the "Unità di Informazione Finanziaria" (Financial Information Office), the "Direzione Investigativa Antimafia" (Anti-Mafia Investigation Department) and the Special Currency Police Unit of the Guardia di Finanza (Financial Police).

In compliance with the regulations of the Anti-Money Laundering Laws, please complete and sign the Information Document and enclose relevant documentation.

Anti-Money Laundering Information Document

(for natural persons)

The undersigned:

Surname and Name

Place and date of birth

Registered address Street..... no.

Municipality.....

Province ZIP Code Country

Profession/Business activity

Tax Code

Identity document (*attach a copy*): Identity card Driver's License Passport Other

no. issuing authority date

Acting in his/her capacity as: Owner Other

of Sole-proprietorship business

of Professional activity

registered address

VAT No.

(the "Client")

Assuming full responsibility in accordance to Art. 22 of Legislative Decree No. 231/007

1. Hereby declares that the purpose and the nature of the professional service required from V&A are the following:

- Preparation and/or sending statements pertaining to tax requirements (UNICO (tax return), ICI (town tax), VAT, etc.)

A) SERVICES WHOSE VALUE IS UNDETERMINED OR CANNOT BE DETERMINED

- Cost-revenue analysis, drawing up of economic and financial plans
- Assistance on insolvency procedures
- Consultancy on extrajudicial agreements
- Consultancy on extraordinary operations:
- Consultancy on: accounting matters, financial statements
- Consultancy and services in setting up: corporations, other organizations, trusts and similar legal entities
- Administrative inspections, audits, certifications
- Organization of the necessary contributions in setting up: corporations, other organizations, trusts and similar legal entities
- Accounting and preparation of accounting and tax records accounting and administrative data entry
- bookkeeping reorganization
- Regulations and settlement of damages
- Other services:
-

B) PROFESSIONAL SERVICES RELATING TO MEANS OF PAYMENT, GOODS OR ASSETS

- Administration and liquidation of: sole-proprietorship businesses, business assets, single assets
- Arbitration and any other dispute resolution services
- Assistance, consultancy, representation and defense in: fiscal proceedings, judicial proceedings, extrajudicial proceedings
- Assistance and consultancy on preliminary investigation for business financing
- Technical evaluation of the business project and business plan survey to access public funding
- Consultancy on contractual matters
- Consultancy and transfer of company shares
- Consultancy of any kind on transfers of: real estate, economic activities
- Custody and preservation of assets, companies
- Management of: securities accounts, bank accounts, money, deposit passbooks
- Management of cash collections and payments on behalf of the client
- Management of social security and insurance details
- Extraordinary financial operations
- Preparation of technical valuation and survey report
- Preparation of the Surveyor's report required by the Italian Civil Code
- Arrangements consultancy for: heirs assets family arrangements
- Valuations of: companies, business branches, assets
- Other services:

Value of the Professional Service:

- undetermined or cannot be determined
- €

Source of funds to finance the Professional Service (if any)

Funds used to finance operations come from:

- Own business activity
- Inheritance or donations
- Sale of other assets
- Bank loans
- Other

(the "Mandate")

2. Having acknowledged the definition of "beneficial owner" according to Legislative Decree No. 231/2007 as described in note (A):

the undersigned declares that:

- he is acting on his own, and therefore, there is no beneficial owner
- he is acting on behalf of the following beneficial owner:
 - Name and Surname
 - Place and date of birth
 - Registered address Street..... no.
 - Municipality.....
 - Province ZIP Code Country
 - Tax Code
 - Identity document (attach a copy): No.....
 - Issuing authority date

3. Having acknowledged the definition of “politically-exposed persons” according to Legislative Decree No. 231/07 as described in note ^(B):

the undersigned hereby declares:

- That he/she is not a “politically-exposed person”
- That (*Name and Surname*) can be considered a “politically-exposed person” as (indicate position of public office or the close or family ties with the person who holds the public office):
.....

The undersigned declares the truthfulness of the Data and information provided above and to be aware of the criminal charges and of the reporting obligations as stipulated in the Anti-Money Laundering Law, to be aware that the data and information are necessary to enable V&A to comply with correct client due diligence as set out in the Anti-Money Laundering Law as well as to perform the Mandate. He/she will also accept the responsibility to provide and to verify any additional or updated Data when necessary, as required by the requisite of client due diligence and correct monitoring as stipulated by the Anti-Money Laundering Law, and by the Italian Privacy Law.

Signature
Name
Place and Date (day/month/year)

^(A) According to Art. 1.2 (pp) of Legislative Decree No. 231/2007, “**beneficial owner**” means any natural person(s), other than the client, who ultimately sets up long-term business relationship or have professional services provided or transactions carried out on behalf of the client.

^(B) According to Art. 1.1dd of Legislative Decree No. 231/2007, “**politically-exposed persons**” are: natural persons who have taken or have ended taking office of important public functions for less than a year, as well as their immediate family members, or persons known to be their close associates, such as the following:

- 1) natural persons who take or have taken office of important public functions that include or have involved the following functions:
 - 1.1 President of the Republic, Prime Minister, Minister, Vice-Minister and Undersecretary, President of a Region, regional councilor, provincial capital or city mayor, mayor of municipalities with a population of at least 15,000, as well as similar functions in foreign states;
 - 1.2 members of parliaments, senators, members of the European parliament, regional councilor, as well as similar functions in foreign states;
 - 1.3 member of the central governing bodies of political parties
 - 1.4 members of the Constitutional Court, Court of Cassation or Court of Auditors, State councilor and other members of the Sicily Region Administrative Justice Council, as well as similar functions in foreign states;
 - 1.5 members of central bank decision-making bodies and independent authorities;
 - 1.6 ambassador, chargé d'affaires or equivalent functions abroad, high-ranking officials of the armed forces or similar functions in foreign states;
 - 1.7 members of the administrative, management or supervisory bodies of enterprises that are directly or indirectly controlled by the Italian State or by a foreign state, or mainly or fully held by Regions, provincial capitals and cities and municipalities with a population of at least 15,000
 - 1.8 general manager of the local health authority, hospital, university hospital and other national health service institutions.
 - 1.9 director, deputy director and member of the management body or persons who carry out equivalent functions in international organizations;
- 2) the immediate family members of the politically-exposed persons include: parents, spouse or partner in a civil partnership or cohabitation or associated to the politically-exposed person through similar institutions, their children and their spouses through civil partnership, cohabitation or similar institutions;
- 3) persons who have close ties with the politically-exposed person:
 - 3.1) any natural person who has joint beneficial ownership of legal entities or any other close business relations with the politically-exposed person;
 - 3.2) any natural person who has sole beneficial ownership of a legal entity or legal arrangement which is known to have been set up for the benefit de facto of the politically-exposed persons.