

Information notice given pursuant to section 13 of Regulation (EU) 2016/679 (GDPR)

Impemba & Associati srl, having its seat in Milan, Via Tortona, n. 72, in person of its legal representative, as Controller of your personal data spontaneously communicated, given pursuant to section 13 of Regulation (EU) 2016/679 (GDPR - General Data Protection Regulation),

informs you about:

1. Identity and contact details of the Controller

Impemba & Associati srl
Via Tortona, 72, 20144 Milan
Telephone +02 89401372
Tax code / VAT n.: 07988780156

Your personal data shall be processed lawfully for the purpose of carrying out orders, providing services for which the registration is envisaged and for other purposes indicated in this informative note. The processing shall be based on principles of correctness, lawfulness and transparency as well as protection of your privacy.

2. Purposes of the processing for which the personal data are intended

Your personal data will be processed:

(i) without your consent (GDPR, section 6, items b, c, f), for the following purposes:

- performance of pre-contractual and contractual obligations deriving from the execution of a possible professional service contract;
- compliance with legal obligations, as provided for by a law (national or EU) or if requested by any Authority, as well as any other entity to which the Controller is subject;
- exercise of the rights of the Controller, with particular reference to judicial defensive rights.

(ii) with your consent (GDPR, section 7), for the following purposes:

- organisation of events, conferences, lessons and workshops also for professional training;
- marketing and promotional activities of professional services, distribution of promotional materials, sending out of professional newsletters and publications;
- management of surveys and customers' satisfaction questionnaires.

For the purposes under par. (i) above, the collection of your personal data is necessary. The absence of the data or an express refusal to process such data may result in the impossibility for the Controller to perform the professional services, or in possible violation of the competent Authorities requests.

For the purposes under par. (ii) above, the collection of your personal data is made on voluntary basis; consequently, you may decide not to provide us with any consent, or to waive it at any time.

3. Processed categories of personal data

Within the purposes of the mentioned processes under par. 2) above, we shall exclusively process those personal data concerning, by way of example, your name and family name, tax code, VAT number,

residence, domicile, work address, email, certified email address, phone and fax numbers, employer company, etc.

4. Methods of processing personal data

Your personal data are processed through the operations indicated in General Data Protection Regulation, section 4, n. 2), - whether or not performed by automated means – such as: collection, recording, organisation, structuring, update, storage, adaptation or alteration, retrieval and analysis, consultation, use, disclosure by transmission, alignment or combination, restriction, erasure or destruction.

Whichever the way, it will guaranteed their security, logical and physical, and overall their confidentiality, adopting all necessary technical and organisational measures appropriate to guarantee the data security.

5. Personal data storage period

Personal Data provided for the purposes indicated under par. (2), section (i) above are processed and stored for the entire duration of the executed professional services contract.

As of the termination of such contractual relationship, for whichever reason or cause, personal data will be stored as long as time-barring legal terms will be elapsed.

Personal Data provided for the purposes indicated under par. (2), section (ii) above are processed and stored for the time necessary for the performance of the same purposes and, anyhow, not later than 2 years from the date in which we will receive your consent.

6. Categories of personal data recipients

The personal data you will submit to us for the purposes mentioned under par. 2), section (i) above, could be transferred to:

- Employees and collaborators of the Controller, in their capacity of persons duly authorised to data processing;
- Any third party subject, performing outsourced activities on behalf of the Controller, in their capacity of data processors;
- Any judicial or controlling Authority, public entities (whether national or foreign ones).

Upon your express consent to processing the personal data for the purposes indicated under par. (2), section (ii) above, data may be transferred to those subjects indicated above, as well as, upon your prior consent, to other Italian legal entities.

Your personal data will not be subject to dissemination.

7. Transfer of personal data to third Countries

Personal data are processed and stored on servers located in Milan, inside the EU.

The transfer to non EU-countries is performed in compliance with the provisions under par. V, GDPR (sec. 46), adopting standard contractual clauses drafted pursuant to versions no. 2004/915/EC and n. 2010/87/EU, as adopted by the European Commission.

8. Exercisable rights

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

- **Right of access** – Obtain confirmation whether your data are processed or not and, in such a case, obtain information related, in particular, to: the purposes of such processing, the categories of the processed personal data, the storage period, the recipients to whom such data can be transferred (Section 15, GDPR);
- **Right of rectification** – Obtain, without undue delay, the rectification of inaccurate personal data and to have incomplete personal data completed (Section 16, GDPR);
- **Right of erasure** – Obtain, without undue delay, the erasure of your personal data, in the cases provided for by the GPDR (Section 17, GDPR);
- **Right to restriction** – Obtain from the Controller the limitation to processing, in the cases provided for by the GDPR (Section 18, GDPR);
- **Right to data portability** – Receive your personal data as communicated to the Controller in a structured, commonly used and machine-readable format and obtain the transmission of such data to another controller without any hindrance, in the cases provided for by the GDPR (Section 20, GDPR);
- **Right to object** – Object to the processing of your personal data, unless the Controller have compelling legitimate grounds for the continuation of the processing (Section 21, GDPR);
- **Right to lodge a complaint with the Supervisory Authority** – Lodge a complaint to Autorità Garante per la protezione dei dati personali, Piazza di Montecitorio n. 121, 00186, Roma (RM).

9. How to exercise the rights

You may exercise your rights by:

- Registered letter to Impemba & Associati srl, Via Tortona, 72 Milano, Tax code / VAT no: 07988780156;
- Certified e-mail to impembaeassociati@alapec.it.