

## **PRIVACY POLICY**

### **Information pursuant article 13 of EU Regulation n.2016/679**

In accordance with article 13 of Regulation (EU) n. 2016/679 (hereafter “GDPR” or “Regulation”), concerning provisions for the safeguard of people or other subjects regarding the processing of personal data, we wish to inform you that personal data provided by you will be treated according to the abovementioned EU Regulation and according to the obligation of confidentiality by which the Firm Arletti Partners (A&P) is bound.

#### **Data controllers**

Chartered Accountant Alessandro Arletti processes the data as controller, domiciled at the same-named Firm in Corso Cavour n.39, 41121 Modena (MO).

#### **Purposes of the process**

The personal data provided are necessary to fulfil contractual and normative obligations, besides offering information on services provided by A&P.

Personal Data, including data bound to services required by users, shall be disclosed only to possible Collaborators, Supervisors or Staff appointed to data processing by Chartered Accountant Alessandro Arletti or by A&P; likewise, data may be disclosed to foreign partners residing in the European Union, only if sharing such data is absolutely necessary to protect the rights of the data subject. Said partners act as external responsible parties under contract and within the limits defined by Chartered Accountant Alessandro Arletti in his capacity as data controller and they guarantee protection standards consistent with the standards of the Firm.

Providing data is necessary to fulfil the obligations deriving from the provision of service and from law; failure to provide such data makes it impossible to fulfil the obligations borne by the firm.

#### **Methods of processing and retention**

Personal data processing will be carried out automatically and/or manually, in compliance with art. 31 of GDPR concerning security measures, even by external parties specifically appointed and in compliance with art. 29 of the said EU Regulation. In accordance with the principles of lawfulness, restriction of purposes and data minimisation, in compliance with art. 5 of GDPR, personal data will be stored for no longer than it is necessary for the purposes for which the personal data are collected and processed.

### **Context of communication and disclosure**

Except for what has been laid down in this policy and has been authorized for the “purposes of the process”, the collected data shall never be disclosed and shall not be communicated without explicit consent, save for necessary communication which may entail disclosing data to public bodies, to consultants or other subjects, so as to fulfil legal requirements.

### **Transfer of personal data**

Under no circumstances shall data be transferred to third Countries not part of the European Union.

Personal data may be transferred to foreign partners residing in the EU area, only if strictly necessary and in accordance with the principle of data minimisation. Such partners are appointed by the Controller as external parties responsible for processing and they guarantee a total compliance with the firm’s policy on protection of personal data. Furthermore, partners are members or national professional orders (lawyers, Accountants or Labour consultants).

### **Special categories of personal data**

In compliance with article 9 and 10 of the EU Regulation, data qualifying as “special categories of personal data” may be provided, that is, data which reveal “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”. Such data categories are not processed, and their disclosure is, in any case, prevented by policy, except for compelling legal obligations or explicit requests made by national authorities.

### **Existence of an automated decision-making process, including profiling**

The firm does not use any automated decision-making process, including profiling, described in article 22, paragraphs 1 and 4 of the said EU Regulation.

### **Rights of the data subject**

At any moment the data subject, according to articles 15 to 22 of the EU Regulation, shall have the right to:

- a) Ask confirmation as to whether or not personal data concerning him or her are being processed.
- b) Obtain information regarding the purposes of processing, the categories of personal data, the recipients, or categories of recipient to whom the personal data have been or will be disclosed and, when possible, the period of storage.
- c) Rectification or erasure of personal data.
- d) Obtain the restriction of processing.
- e) Obtain data portability, that is to receive data from a data controller in a structured, commonly used and machine-readable format and transmit those data to another controller without hindrance.
- f) Object to processing at any moment, even in case of processing for direct marketing purposes different from those mentioned in paragraph “purposes of the process”.
- g) Object to an automated decision-making process concerning natural persons, including profiling.
- h) Ask the data controller for access to personal data and for rectification or erasure of such data or a restriction of processing concerning him or her, besides the right to data portability.
- i) Withdraw consent at any moment without prejudice to the lawfulness of processing based on consent before its withdrawal.
- j) Lodge a complaint to the supervisory authority, in particular the Italian Data Protection Authority.

These rights may be exercised with a written request sent to A&P Arletti Partners to the postal address Corso Cavour n. 38, 41121 Modena (MO) or to the email address [info@arlettipartners.com](mailto:info@arlettipartners.com)