

PRIVACY POLICY

FOR THE PROCESSING OF PERSONAL DATA OF CLIENTS

PURSUANT TO EU REGULATION n. 2016/679 (“the GDPR”)

DATA CONTROLLER

- Company name: Studio Legale Associato Isolabella
- Via Fontana 4, 20122 Milan (Italy)
- Telephone: 02 599 2101
- Email address: segreteria@studioisolabella.it

CONTACT DETAILS FOR THE DATA PROTECTION OFFICER OR DPO (“RESPONSABILE DELLA PROTEZIONE DEI DATI” OR “RPD”)

- Name and Surname: Cesare C.M. Del Moro
- Address: Largo Cairoli 2, 20121 Milano
- Telephone: 02 8718 7157
- Email address: dpo@bassidelmoro.it

TYPE OF DATA, PURPOSE OF PROCESSING



The following type of data will be collected and processed:

- Identification data: name, surname, tax id (“codice fiscale”), etc;
- Contact data: telephone number, email address, address, etc;
- Bank details: IBAN, credit card number, etc;
- Special categories of personal data (sensitive data): data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, 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;

For the following purposes:

- d. Establishment and performance of the professional appointment;
- e. Compliance with the obligations provided by applicable laws and regulations;
- f. If necessary, to ascertain, exercise and defend the Data Controller's rights in or out of court.

LEGAL GROUNDS AND PROCESSING MEANS



The applicable legal grounds for processing, as identified by the GDPR, are the following:

- Performance of the professional appointment;
- Authorisation by law pursuant to Art. 2-*octies*, par. 3 letter f of Law (D.Lgs.) 101/18;
- Need to comply with legal obligations;
- Legitimate interest of the Controller for a smoother performance of the professional appointment;
- Optional consent, which may be withdrawn at any time without prejudice also in connection with processing based on consent provided before withdrawal.

Data will be processed with support from paper, digital or telematic instruments. Processing shall be carried out by authorised and trained subjects, using suitable technical and organisational means to protect such data.

In all cases, personal data will be:

- Processed in a lawful and fair manner;
- Collected and registered for specified, explicit and legitimate purposes;
- Accurate, and if necessary, updated;
- Relevant, complete and limited to what is necessary in relation to the purposes for which it is processed.

CONSERVATION OF DATA OR PRINCIPLES FOR ESTABLISHING SUCH PERIOD



The data conservation period is established as follows:

- 10 years after the end of the appointment;
- In case of litigation, for the duration thereof and for the duration of the terms for challenge.

Once the above storage **terms have elapsed, data will be destroyed**, deleted or made anonymous, compatibly with the state of the art of technology.



OBLIGATION OF DATA DISCLOSURE



The disclosure of data for the purposes set out in points a), b) and c) above is compulsory. In case of failed disclosure of data, it will not be possible to proceed with the contractual professional appointment.

THIRD PARTY RECIPIENTS OF DATA



Data may be sent to subjects different from the Controller.

Data may also be sent to subjects processing such data on account of the Firm as Data Processors, on the basis of a legally binding agreement protecting the data.

The categories of such subjects include but are not limited to:

- d.IT suppliers (eg. data back-up, email, WEB/cloud computing, hosting, network monitoring, email dispatch, website maintenance services etc.);
- e.Consultants (eg. Professionals, technical consultants, investigation companies, etc.);

f. Authorities and regulators, public or private subjects entitled to request data.

DATA PROCESSORS



Data may be processed by staff and consultants in connection with their role, who are specifically authorised and suitably trained for processing.

TRANSFER OF DATA TO THIRD COUNTRIES (NON-EU/EEA)



The transfer of data to third countries (outside of the EU/EEA) is possible if such countries have been considered adequate by the European Commission pursuant to art. 45 of the GDPR, or:

- Following the implementation of adequate safeguards pursuant to art. 46, 2, letters c) and d) of the GDPR (binding corporate clauses, standard contract clauses, implementation of a code of conduct or certification mechanism);
- Further to the presence of one of the derogations of art. 49 of the GDPR (eg. consent, transfer required for contract or pre-contract purposes in connection with an agreement entered into with the interested party or in their favour, assessment, exercise or defence of a right in court, etc.).

RIGHTS OF THE INTERESTED PARTY COMPLAINTS TO THE AUTHORITIES



Data Owners have the following rights:

h) Access - in order to:

- Find out whether data is being processed, for what purposes, what data; discover what recipients or categories of recipients have received or will receive the data, and where possible, the storage period provided for personal data, or if not possible, the principles used to determine such period; discover their rights, information on the origin of data, whether an automatised decision-making process is under way, including profiling (at least, in such cases, with significant information on the logics used and the importance and consequences of such process); discover what suitable safeguards are available if data is transferred to a third country;

- Obtain copy of the personal data being processed without harming the rights and liberties of others;

i) Correction and integration of inaccurate data - keeping in mind the purpose of processing;

j) Cancellation - in the following cases: a) the personal data is no longer necessary in terms of the purposes for which it was collected or processed; b) the Data Owner withdraws consent if there are no more legal grounds for processing; c) the Data Owner opposes the processing of data in the absence of prevailing rights or obligations against it; d) the personal data is processed unlawfully; e) there is a legal obligation for the Controller to do so; f) the personal data was collected in connection with an offer of services on the internet;

k) Limitation to processing by way of challenge to the accuracy of data; unlawful processing because excessive; for the ascertainment, exercise or defence of a right in court (even when the Controller no longer needs the data); in case of challenge (while awaiting a verification on the concrete applicability of such right);

- l) Opposition (in case of processing required for the performance of a duty in the public interest or by way of legitimate interest of the Controller, including profiling) for reasons connected with the particular situation of the Data Owner, except if other rights in the interest of the public or legal obligations prevail;
 - m) Opposition to receipt of commercial communications through automatic means (email, etc.) for processing aimed at direct marketing, including profiling;
 - n) Portability of data in a common and interoperable format, also directly through another Operator if technically possible, in case of processing through automatised instruments;
- In cases as per letters b), c) and d), the Controller shall advise each of the recipients to whom the personal data has been transmitted of any corrections or cancellations or limitations to the processing, unless it is impossible or implies a disproportionate effort.

In order to exercise their rights, Data Owners may contact the Controller or the DPO through the contact details provided herein.

Data Owners are entitled to file a complaint with competent Authorities in the member State in which they usually live or work, or in the State in which the presumed violation has occurred.

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