

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

DATA CONTROLLER

- Company name: Studio Legale Associato Isolabella
- Via Fontana 4, 20122 Milano (MI)
- Phone number: 02 599 2101
- Email: segreteria@studioisolabella.it

CONTACT DETAILS FOR THE DATA PROCESSING OFFICER (RPD/DPO)

- Name: Avv. Cesare C.M. Del Moro
- Address: Largo Cairoli 2, 20121 Milano
- Phone number: 02 8718 7157
- Email: dpo@bassidelmoro.it

TYPE OF DATA, PROCESSING PURPOSE

We will gather and process the following types of data:

- Identification data: name, surname, tax identification number, etc.;
- Contact details: phone number, email, address, email, etc.;
- Bank details: IBAN, credit card number, etc.;
- Special categories of data (previously sensitive data): revealing 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 relating to criminal convictions and offences (previously judicial offences): criminal records, administrative fines connected with offences and pending proceedings, or the status as defendant or person under investigation pursuant to articles 60 and 61 of the Code of Criminal Procedure; or personal data connected with criminal sentences and offences or to connected safety and security measures

For the following purposes:

- d. Execution and performance of the professional appointment or commercial relationship;
- e. Compliance with obligations originating from applicable laws and regulations;
- f. If required, to ascertain, exercise or defend the rights of the Data Controller in and out of court.

LEGAL BASIS FOR PROCESSING AND MEANS

The applicable legal bases for processing as identified within 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 Data Controller to facilitate the performance of the professional appointment;

- Optional consent that may be withdrawn at any time without prejudice to you, also in connection with processing based on consent offered before withdrawal.

Data shall be processed with support from paper, electronic or digitalised means. Processing shall be carried out by authorised and trained subjects, implementing adequate technical and organisations measures to ensure protection of the data.

In any case, personal data shall be:

- Processed in a lawful and fair manner;
- Gathered and filed for specific, explicit and legitimate reasons,
- Correct, and if needed, updated;
- Pertinent, complete and not in excess of the requirements of processing.

CONSERVATION OF DATA OR PRINCIPLES FOR ESTABLISHING SUCH PERIOD

The data conservation period shall be as follows:

- 10 years after the end of the appointment;
- In case of dispute, for the duration of the dispute and the terms for appeal.

At the end of the conservation term as specified above, **data shall be destroyed**, made anonymous, compatibly with the state of the art of technicalities.

DATA DISCLOSURE OBLIGATION

Disclosure of data for the purposes set out in letters a), b) and c) above is compulsory. In case of non-disclosure of data, it will not be possible to execute the contract-based professional assignment.

THIRD PARTY RECIPIENTS OF DATA

Data may be transmitted to subjects different from the Data Controller.

Data may be transmitted to autonomous Data Controllers or subjects processing on behalf of Studio Isolabella as Data Processor on the basis of a legally binding agreement protecting the data.

A sample of subject categories is listed hereunder:

- d. IT providers (eg. services such as data back-up, email, WEB/cloud computing, hosting, network monitoring, e-mail dispatch, website maintenance, etc.);
- e. Consultants (eg. Professionals, technical consultants, private investigation companies, etc.);
- f. Authorities and regulators; public or private subjects entitled to demand data.

SUBJECTS AUTHORISED TO PROCESS

Data may be processed by staff and consultants in connection with their role, who have been duly authorised and properly trained in processing.

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

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

- Subject to the implementation of adequate protections pursuant to x art. 46, 2, letters c) and d) of the GDPR (legally binding clauses, standard contract clauses, subscription of code of

conduct or certification mechanism);

- Previous existence of one of the derogations pursuant to art. 49 of the GDPR (eg. consent, transfer for the conclusion or performance of a contract concluded in the interest of the data subject; establishment, exercise or defence of legal claim in court, etc.).

RIGHTS OF THE DATA SUBJECT. COMPLAINT TO THE SUPERVISORY AUTHORITY

The data subjects are entitled to:

i) Access, to:

- Find out whether or not personal data concerning him or her are being processed, for what purposes, on what data; recipients or categories of recipient to whom the personal data have been or will be disclosed, and where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; the rights of the Data Subject, information on their origin, the existence of automated decision-making, including profiling (at least in such cases with significant information on the logic involved, the significance and envisaged consequences of such process); the appropriate safeguards if data are transferred to a third country.

- Obtain a copy of the personal data subject to processing without adversely affecting the rights and freedoms of others;

b) Rectification of inexact data and integration thereof, keeping in mind the purpose of processing;

c) Erasure in the following cases: a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the data subject withdraws consent and there is no other legal ground for the processing; c) the data subject objects to the processing and there are no overriding rights or obligations against this; d) the personal data have been unlawfully processed; e) there is an obligation in this sense on the Data Controller; f) the personal data were gathered in connection with the offer of services on the internet;

d) Restriction of processing when accuracy is contested; for unlawful processing because excessive; for the establishment, exercise or defence of a right in a court (including when the Data Controller no longer needs the data); in case of opposition (while awaiting verification of the concrete applicability of such right);

e) Objection (in case of processing required for the execution of a task in the public interest or for legitimate interest of the Data Controller, including profiling) for reasons connected with the particular situation of the Data Subject, save for the prevalence of other rights of public interest or legal obligations;

f) Objection to the receipt of commercial communications with automated means (email, etc.) for processing having direct marketing purposes, including profiling;

g) Portability of data in a commonly used and machine-readable format, also directly through another Operator if technically possible, in case of processing with automated instruments;

h) In the cases described in points b), c) and d), the Data Controller shall notify each of the recipients to whom personal data was sent of any rectification or erasure or limitation in processing, unless unfeasible or requiring disproportionate efforts.

Data Subjects are entitled to make a complaint to the competent Supervisory Authority of the member state in which they habitually reside or work or in the state where the presumed violation occurred.

EXERCISE OF RIGHTS AND FURTHER INFORMATION

In order to exercise their rights or to obtain further information, Data Subjects may contact the Data Controller or the DPO through the contacts indicated in this policy.

Concerned persons have the right to propose a claim to the Control Authority in charge in the member Country where they usually live or work or in the Country where the alleged violation occurred.

LATEST UPDATE: JANUARY 2020