

INFORMATIVE ON PERSONAL DATA PROCESSING

C.P.S. ANALITICA S.R.L., with registered office in Via Crosa, 67 – 28065 Cerano (NO), VAT number 02750990034 (later referred to as Controller), as Data Controller, informs you that, according to art. 13 EU Regulation n. 2016/679 (later also referred to as “**GDPR**”), will be processed with the following methods and purposes:

1. Data subject to processing

The Data Controller will process personal data as: name, surname, company name, address, VAT number, TAX code, e-mail address, certified e-mail address, bank, and payment details – later also referred to as “**personal data**”, disclosed by latter in accordance with the stipulation of the contract for the services rendered by the Data Controller.

2. Purposes of the processing

Your personal data are processed:

- a) without your prior expressed consent (art. 6 let. b), c) GDPR), for those services purposes:
- stipulation of the contract for the services rendered by the Data Controller;
 - fulfilment of pre-contractual, contractual and financial obligations, arising from the relation with the Data Controller;
 - fulfilment of the legal obligations laid down by the law, a regulation, Community legislation or an Authority order (for instance about anti-money laundering);
 - exercise the rights of defence in court.

3. Processing Methods

Your personal data are processed using the operations listed in art. 4 of Privacy Law and in art. 4 n. 2) GDPR, more specifically: data collection, recording, organization, storing, consultation, processing, rectification, selection, extraction, comparison, use, interconnection, communication, erasure, and destruction.

Your personal data will be processed both in paper form and electronically.

The Data Controller will process your personal data only for the period required to fulfil the purpose listed above and, in any case, for maximum 10 years starting from the termination of the contract.

4. Access to personal data

Your personal data will also be processed, for the purposes listed in art. 2.a), by:

- employees and assistants of the Data Controller, as Data Processors and/or in-house data manager and/or system administrators;
- Third-party companies and other companies or societies (e.g., banks, professional offices, consultants, insurance companies, etc.) that work in outsourcing for the Data Controller, as external processor.

5. Data communication

Without the need of a prior expressed consent (art. 6 let. b) e c) GDPR), the Data Controller may communicate your personal data, for the purposes listed in art. 2.a), to: supervision Authorities, legal Authorities, to insurance companies for the provision of their insurance services, and to the third parties to which the communication of your data is required by the law. Those third parties will process your personal data as data controller. Your personal data is not subject to automated dissemination.

6. Data transfers

Your personal data are stored in our server located in the registered office of the Data Controller, in the European Union. It is hereby understood that the Data Controller, if necessary, will be free to move server also in non-EU countries. Data Controller ensures that data transfer to non-EU countries will be carried out according to legal rules, subject to the stipulation of the standard contractual clauses required by the European legislation.

7. Nature of data provision and consequences of the refuse to answer

Data provision for the purposes listed in art. 2.a) is mandatory. In their absence, services listed in art. 2.a) cannot be guaranteed.

8. Rights of the interested party

In the end, we inform you that the articles 15 - 21 of the Regulation grant the data subject the exercise of specific rights, in particular:

- Art. 15 – Right of access: The data subject has the right to obtain confirmation from the Data Controller as to whether personal data concerning him or her is being processed and, where that is the case, to obtain access to personal data and information regarding the processing.
 - Art. 16 – Right of rectification: The data subject has the right to obtain from the Data Controller the rectification of inaccurate personal data concerning him or her without undue delay. Considering the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, also by providing a supplementary declaration.
 - Art. 17 – Right to erasure ("right to be forgotten"): The data subject has the right to obtain from the data controller the erasure of personal data concerning him or her without undue delay and the data controller has the obligation to erase the personal data without undue delay where one of the grounds mentioned in Article 17 of the Regulation applies.
 - Art. 18 - Right restriction of processing: The interested party has the right to obtain from the data controller the restriction of processing when one of the grounds referred to in art. 18 applies.
 - Art. 19 – Notification obligation regarding rectification or erasure of personal data or restriction of processing: The Data Controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17 (paragraph 1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves a disproportionate effort. The Data Controller communicates these recipients to the interested party if the interested party requests it.
 - Art. 20 - Right to data portability: The interested party has the right to receive, the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another data controller without hindrance from the data controller to which data have been provided.
 - In exercising his or her rights in relation to data portability pursuant to paragraph 1, the interested party has the right to have the personal data transmitted directly from one data controller to another, where technically feasible.
 - Art. 21 - Right to object: The interested party has the right to object at any time, on grounds relating to his or her situation, to processing of personal data concerning him or her pursuant to article 6, paragraph 1, letters e) or f), including profiling based on those provisions.
- The European Regulation also recognizes the interested party's right to lodge a complaint with the supervisory authority, the right to withdraw consent at any time and the right to data portability.

9. How to exercise your rights

You can in any moment exercise your rights by sending:

- a registered letter A/R to the operational headquarters of **C.P.S. ANALITICA S.R.L.** in Via Neera, 8/A – 20141 Milano (MI);
- a PEC to cpsanalitica@legalmail.it.

10. Data Controller, Data Processor, and appointees

The Data Controller is **C.P.S. ANALITICA S.R.L.**

The updated list of Data Processors and appointees is kept at the Data Controller's operational headquarters.