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PRIVACY POLICY

pursuant to article 13 of the EU Regulation no. 2016/679

If you are reading this Privacy Policy, then it means that you are visiting our website. The information below is provided so that you can find out how we process your personal data when visiting our website or when interacting with us through it, e.g. when you contact us or when you sign up for our newsletter. On such occurrences, as well as in other circumstances, we shall process some of your personal data. We shall do so in accordance with the EU Regulation no. 679/2016 (GDPR) and in accordance with the Privacy Code as amended by Legislative Decree 101/2018.

Who is the Data Controller?

The Data Controller responsible for processing personal data collected through this website is **Consulenti Privacy S.r.I.**, with registered office located in via Antonio e Leonida Valentini n. 11 – Rimini (RN), VAT number 04391970409, (hereinafter, also referred to as "**Data Controller**"). You can contact the Data Controller writing an e-mail to <u>info@iconsulentiprivacy.it</u> or calling number 0541 1798723.

Why do we process your personal data and when do we collect them?

NAVIGATION DATA

During their regular functioning the IT systems and software procedures used to operate this website normally collect some personal data whose transmission to others is intrinsically inherent to Internet communication protocols.

This category of personal data includes the IP addresses or domain names of the computers and terminals used by you, the URI/URL notation addresses of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server response – i.e. successful, error, etc. – as well as other parameters related to the user's operating system and IT environment.

Can we process these data without your consent? Yes. These data are necessary for Internet communication as well as to enable you to use our website (art. 6(f), GDPR).

How long do we keep these data? Navigation data do not persist for more than seven days – except in case judicial authorities need to investigate crimes, if any.

COOKIE DATA

As the Data Controller, when you browse our website we shall collect some of your personal data for analysis and data processing purposes, to memorise your preferences and browsing experiences. We shall use technologies such as first-party and third-party cookies to collect your data.

Can we process these data without your consent? Partly. Technical cookies are necessary for the correct operation and security of our website. We shall use technical cookies to collect personal information on the basis of our legitimate interest (art. 6(f), GDPR). The collection of personal data through first-party and third-party, non-essential cookies shall only occur after your express consent (art. 6(a), GDPR). We shall notify you in that respect via a special cookie banner at the bottom of the homepage when you first log in. You can choose analytically which cookies you want to install via this banner.

For more information about what cookies are, how they function, and which ones we use, please refer to our <u>Cookie policy</u>.

How long do we keep these data? The retention period of these data is specified in the cookie banner, if you choose to view the cookies analytically. Otherwise, you can find the retention time in the settings menu at the bottom left corner of each page of our website.

Look for this symbol:



CONTACTS

If you choose to contact us through the form on our website we shall process your personal data and those related to your e-mail address, as well as your telephone number, if you agree to do so.



Can we process these data without your consent? Yes, because we are following up on a request from you (art. 6(b), GDPR).

How long do we keep these data? We shall keep these data only for as long as necessary to process and respond to your request.

APPLICATIONS

If you go to the 'Team' section you can submit your spontaneous job application. In doing so, we shall process the personal data contained in your CV, including any special data such as protected health group status, etc.).

Can we process these data without your consent? Yes. We can process these data to evaluate your application in accordance with the General Authorisation of the Supervisory Authority no. 146 of 5 June 2019 and pursuant to articles 6(b), GDPR and 111-bis of Legislative Decree no. 196/03. Therefore, your express consent is not required.

How long do we keep these data? We shall keep these data for 12 months after your application was submitted.

NEWSLETTER

You can sign up for our newsletter though the corresponding form on our website. In this case, we shall process your first name, surname, address and e-mail address. In addition, if you decide to request information about our services using the contact form in the 'Contacts' section you shall also receive promotional and informational communications from us.

Please note that this form is exclusively for enquiries about the services we offer and we kindly ask you not to use it for other purposes.

Can we process these data without your consent? No. In fact, your explicit consent is required (art. 6(a), GDPR). However, if you contact us for enquiries about the services we offer we shall process your personal data based on our legitimate interest (art. 6(f), GDPR).

How long do we keep these data? We shall keep these data for 36 months from the date of the last interaction with us. You may request the erasure of your data at any time, and we shall immediately comply.

How do we process your data?

Your personal data shall be processed using tools and procedures capable of ensuring data safety and confidentiality. Processing may occur both through our website and through other electronic tools – e.g. in-house database management systems – and sometimes via soft copies. In addition to the Data Controller, in some instances other staff in charge of managing this website may have access to your personal data. This may include in-house staff such as administrative and sales staff, system administrators, etc., and external staff – e.g. third-party technical service providers, hosting providers, IT companies, communication agencies, data entry agencies. Where required by law, we shall appoint these third parties as Data Processors on our behalf. You can request the complete list of appointed Data Processors by contacting us at the following e-mail address: info@iconsulentiprivacy.it

Where are your data located?

The processing of your personal data is carried out primarily within the European Union. However, certain navigation data (such as your IP address), collected through the use of cookies, shall be transferred outside the European Union, particularly to the United States – e.g. in the case of services provided by companies such as Google.

Who accesses your data?

Your data may be made accessible to the Data Controller's employees and collaborators in their capacity as data processors and/or system administrators, including but not limited to, professional firms, consultancies, software houses providing database management systems, etc., which perform processing activities on behalf of the Data Controller in their capacity as external data processors.

Under no circumstances shall we disseminate your personal data.

The recipients of the data processing are those who receive personal data from the Data Controller but, following such communication, act as independent Data Controllers. These include:

• LinkedIn and other platforms used by the Data Controller. When you click on social media or platform icons, you shall be redirected to pages outside this website and, in doing so, you agree to share certain personal data with the Data Controllers of those services. The use of the personal information which you share shall be governed by the privacy policies of such the social media or platforms.

What are your rights?

As Data Subject, you shall have several rights. Amongst other things, the right to have access to your personal data and to request their rectification or erasure, the right to restrict the processing of such data or to object to such processing. To find out more about your rights, consult articles 15 and following of the Regulation. To exercise your rights, you can write to us or call us using the contact details provided at the beginning of this notice.



Right to lodge a complaint

If you believe that our processing infringes your rights in any way, you can lodge a complaint with the Supervisory Authority by following the instructions available on the website www.garanteprivacy.it. A complaint template is available here: https://www.garanteprivacy.it/home/docweb/-/docweb/d

Protection of children's privacy

This website is aimed at a general audience; however, its services are intended for persons of 18 years of age or older. We do not solicit, collect, use or disclose online any personal data from individuals under the age of 18. Should we become aware that we have collected personal data from a child, we shall delete them immediately.

Last updated: 03 September, 2025