

PRIVACY POLICY INFORMATION

According to EU Regulation No. 679/2016 GDPR and to Italian Legislative Decree June 30th, 2003 No. 196 - Personal Data Protection Code - and subsequent amendments and/or additions, we inform you that:

Data Controller and Data Processor: **IDIOMAS snc** with registered office at Via Fossa, 3 Bagnacavallo is the Data Controller. Its legal representative *for the time being* is Antonella Bertoni, tel. 0545 61272 e-mail idiomas3@itpec.it, who is also the Data Processor.

Purposes of Data Processing: Your data will be processed:

A) Without your express consent (art. 24 (a), (b), (c) Privacy Code and art. 6 (b), (e) (GDPR), for the following Service Purposes:

- concluding contracts for the services of the Data Controller;
- fulfilling pre-contractual, contractual and tax obligations arising from relationships with you;
- fulfilling obligations required by law, regulation, EU legislation or by order of the Authority - for instance, in relation to anti-money laundering;
- exercising the rights of the Data Controller, such as the right of defence before the courts.

B) Your data will be processed, only with your specific and distinct consent (art. 23 and 130 Privacy Code and art. 7 GDPR), for the following Marketing Purposes:

- send e-mails, newsletters, commercial communications and/or advertising material related to updates or specific information offered by the Data Controller to its clients, including technological and sector-specific updates, alongside with any client satisfaction forms, related to the Data Controller quality of the service;
- we inform you that if you are already our client or supplier, we may send you commercial communications relating to the services and products of the Data Controller similar to the communications you have previously received, unless you do not consent (art. 130 c. 4 Privacy Code).

Recipients/Categories of Recipients of Personal Data: Personal data may be communicated, solely for the aforementioned purposes, to the categories of data subjects listed below:

- persons, companies, associations or professional firms providing assistance and consultancy, with particular but not exclusive reference to accounting, administrative, legal, labour law, social security, tax and financial issues, who need access to data for purposes ancillary to the execution of the contract, within the limits strictly necessary to the performance of their duties;
- any office of the Public Administration to which the acts are physiologically addressed and/or whenever they expressly request it.

These data subjects act as independent Data Controllers or Data Processors appointed and instructed by the Data Controller. The list of persons to whom the data of the Subject are or may be communicated is at your disposal at the Company/Firm/Entity expressed in the header and can be easily obtained by sending a written request to the Data Controller.

Under no circumstances will the personal data of the Subject be disclosed.

Data storage life: Data will be kept for the period strictly necessary for the purposes for which the subject has given consent to or when this requirement is not necessary, according to the cases provided for by law and, therefore:

- upon completion of the assignment and until the terms for which data life storage is required by law in the event of consent given or not necessary to the purpose have elapsed;
- until revocation in the case of given consent.

Rights of Data Subject:

As a Data Subject, under Art. 7 Privacy Code and art. 15 GDPR you are entitled to:

- a) receive confirmation of the existence, or lack thereof, of their personal data, even if they have not been recorded yet, and to obtain information about them in a clear and understandable way;
- b) To know: 1) the origin of the personal data 2) the purposes and methods of processing;
- c) the rationale applied in case of processing carried out with the help of electronic instruments; d) the identification data of the data controller, data processors and of the representative designated pursuant to art. 5 par. 2 Privacy Code and art. 3, par. 1, GDPR; e) of the persons and categories of persons to which the personal data may be disclosed or that may become aware of them, as representatives designated in the territory of the State, data processors or persons in charge of the processing;
- d) To obtain: 1) Update, correction, or, when necessary, integration of data; 2) Deletion, conversion into anonymous form or blocking of data processed in violation of the law, including those data that do not need to be stored for the purposes for which they were collected and subsequently processed; 3) Confirmation that the operations referred to in sections 1) e 2) have been reported, also with regard to their content, to those to whom data have been communicated or disclosed, except for those cases where it is not possible to fulfil such requirement or where its fulfilment might involve means that are greatly disproportionate with respect to the protected right;
- e) To object, in whole or in part: 1) for legitimate reasons, to the processing of your personal data, even if pertinent to the purpose of collection; 2) to the processing of your personal data for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication, through the use of automated calling systems without the intervention of an operator by e-mail and/or by traditional marketing methods by telephone and/or mail. Please note that the right of opposition of the data subject, set out in the aforementioned par. 2), for purposes of direct marketing through automated means extends to traditional ones and that the data subject can exercise the right of opposition even if only in part. Consequently, the data subject may choose to receive only communications by traditional means or only by automated communications or neither of those communications. When applicable, the data subject is also entitled to, under art. 16-21 GDPR, the Right to rectification, Right to be forgotten, Right

to restriction of processing, Right to data portability, Right to object, as well as Right to apply to the Supervisory Authority.

The aforementioned rights are exercised with a request addressed without formalities to the Data Controller, including through a person in charge, who will be provided with appropriate feedback without any delay. The request addressed to the Data Controller or to the Data Processor may be sent to the following e-mail address: project@idiomas.it

In particular:

Data access and portability: For the entire duration of the relationship up to the cancellation of the data, the data subject is entitled to ask the Data Processor of the treatment access to personal data, ask for the rectification or cancellation of data or the limitation of the treatment that concerns the subject or to oppose their treatment, in addition to the right to portability of data. In compliance with the requirements of the law, the data subject is entitled to receive, in a structured format, in common use and readable by an automatic device, any personal data concerning them supplied by the Data Controller, as well as to transmit such data to another data Controller.

Withdrawal of Consent: The data subject's right to withdraw consent at any time is guaranteed without prejudice to the lawfulness of any processing based on consent given prior to the withdrawal. To revoke the consent to the treatment, please send an email to the following address: project@idiomas.it

Right to Apply to the Supervisory Authority for Personal Data Protection: In the event of a breach of the regulations governing the processing of personal data, the data Subject shall be entitled to lodge an appeal to the Data Protection Supervisory Authority in the manner and within the time limits set out on the website of the Data Protection Supervisory Authority.

Once the aforementioned policy is read and understood:

– regarding the processing of personal data for the purposes referred to in paragraph A) of the aforementioned policy, the data subject shall

consent not consent

– regarding the processing of personal data for the purposes referred to in paragraph B) of the aforementioned policy, the data subject shall

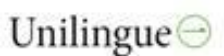
consent not consent

Date _____

Name and Surname _____ Signature _____

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