

PRIVACY POLICY

CDR & ASSOCIATI S.r.l. (hereinafter, for the sake of brevity, the "**Controller**"), as data controller, wishes to inform you, as Data Subject, that, in compliance with the European Regulation No 679/2016 (the so-called **GDPR**, or the "**Regulation**") and to the Italian Legislative Decree No 196/2003 and its subsequent amendments and additions, personal data you provide during the consultation and interaction with the web services of this website will be treated in compliance with the legislative and contractual provisions in force, according to the principles of fairness, lawfulness, proportionality of interests and transparency, as well as the protection of your privacy and your rights, for the purposes and in the manners indicated below.

This privacy statement refers only to this site and not to other websites that may be consulted by the user through links included in the pages of this site. In some circumstances, some data may also be collected from third parties, where necessary and always in compliance with the applicable legislation.

1. Identity and contact details of the Controller

The Controller is CDR & ASSOCIATI S.r.l., with registered office in 20145 – Milan (Italy), Via Tiziano, n. 32, certified e-mail address: cdreassociati@pec.it and e-mail address: info@cdreassociati.it

2. Purpose of the processing and its legal basis

This privacy policy applies only to the online activities of this website and is valid for its visitors / users. It does not apply to information collected through different channels. The purpose of this privacy statement is to provide maximum transparency regarding the information the site collects and how it uses it.

Your personal data will be processed exclusively for the purpose strictly connected, instrumental and necessary for the fulfilment of the obligations relating to the relationships with CDR & ASSOCIATI S.r.l., as well as the companies and professionals operating within CDR & ASSOCIATI S.r.l.; in particular:

- The data processing is carried out by means of the operations indicated in Article 4 No. 2) of the GDPR and, namely: collection, recording, organisation, storage, consultation, processing, alteration, selection, retrieval, alignment, use, combination, blocking, disclosure, erasure and destruction.
- The processing of data is carried out through IT supports of the Controller, and by authorized parties (processors), in compliance with every protection measure ensuring their security and confidentiality.
- The data will not be subject to profiling or automated decision-making processes.
- The data will be stored and processed by the Controller and by the processors designated by the Controller within the borders of the European Economic Area and will be transferred outside this border only by your explicit consent.
- If you provide us with your personal data for a contact or information request (such as but not limited to: requests for information, including commercial requests, requests of information material, application with simultaneous sending of curriculum vitae, participation to the initiatives of CDR & ASSOCIATI S.r.l. and of the professionals operating within CDR & ASSOCIATI S.r.l.), these data are intended to be voluntarily provided by you when the request is sent. By sending such information and / or personal data, the user expressly accepts this privacy statement.
- In any case, by providing these data and information, you expressly agree that the processing of your contact and / or information request through the processing of the data provided by you and contained in your e-mail and in any of its attachments, does not imply

that any professional relationship or mandate, or any employment, or self-employment or collaboration relationship will be entered into with the Controller, or the companies or professionals operating within CDR & ASSOCIATI S.r.l. and, similarly, that such data transfer will not prevent any company or professional operating within CDR & ASSOCIATI S.r.l. to represent any party for any matter in which such data may be relevant, or to use them to defend the interests of its clients.

- This site may, however, process some of the personal data based on the legitimate interests of the Controller as provided for by Article 6 of the GDPR.
- The data received from you will be used only for the amount of time required to process the requests received. Information that the users of the site will believe to make public through the services and tools made available by this website, is considered to be provided by the user intentionally and voluntarily, exempting this site or the Controller from any liability for any infringement of the law. It is up to the user to verify that he has the permissions to enter personal data of third parties or contents protected by national and international rules.
- The data collected by the site during its operation are used only for the purposes indicated below and retained for the amount of time strictly required to carry out the specified activities. In any case, the data collected by the site will never be provided to third parties, for any reason whatsoever, unless a legitimate request by the judicial authority and only in the cases provided for by the law.

3. Data which are subject to the processing

This website uses log files in which information collected in an aggregate form and processed in an automated manner during the visit of the users is retained only for the purpose of verifying the proper functioning of the site, or for security reasons and for the legitimate interests of the Controller provided by the legislation in force. These data are never used for the identification or profiling of the user, but, by their nature, they could enable, through processing and association with other data, the identification of the users.

The types of information collected could be the following:

- Internet Protocol address (IP);
- type of browser and parameters of the device used to connect to the website;
- name of the Internet service provider (ISP);
- date and time of visit;
- source and exit page of the user;
- if necessary, the number of clicks.

For security purposes (anti-spam filters, firewalls, virus detection), automatically recorded data that may include personal data such as the IP address, could be used, in accordance with the relevant rules in force, in order to block attempts to damage the website or to cause damage to other users, or otherwise to prevent harmful activities or actions constituting a crime.

We do not use cookies to transmit personal information, nor the so-called persistent cookies or systems for tracking users. The use of the so-called session cookies (which are not stored permanently on the user's computer and disappear when the browser is closed) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary to allow the safe and efficient exploration of the site.

The so-called session cookies used on this site avoid the use of other IT techniques that potentially affect the confidentiality of the user and do not allow the acquisition of personal identification data of the user.

In the event of a contact or information request, the Controller may process the following types of data, exclusively and voluntarily provided by the Data Subject:

- name and surname or company name, fiscal code or VAT number, residence, domicile and / or registered office, email address and / or certified email address, telephone number;
- personal data of a judicial nature, relating to judicial proceedings or, in any case to disputes, even out of court disputes, in which the Data Subject is a party;
- any data relating to the internal organisation of the Data Subject;
- data belonging to the special categories referred to in Article 9, paragraph 1 of the GDPR, with the consent of the Data Subject, such as: personal 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.

4. Recipients of the personal data which are subject to the processing

The personal data referred to in point 3) above will be processed, where necessary, as well as by the Controller, also by the following recipients, if any: employees of the Controller, as well as employees, collaborators, consultants and professionals operating within CDR & ASSOCIATI S.r.l., where necessary, always within the scope of the purposes referred to in point 2) above and subject to their specific designation which includes the specific instructions required to comply with the legislation on personal data protection, with particular reference to the aspects relating to safety.

The data provided will not be disclosed. However, if necessary, they might be disclosed in the mandatory communications provided for by the regulation referred to in point 2) above.

5. Transfer of personal data to a third country or to an international organisation

The management and storage of personal data will take place on servers located within the European Union and managed by the Controller. Currently the servers are located in Italy.

The data will not be transferred outside the European Union. In any case, it is understood that the Controller, if necessary, will have the right to change the location of the servers to another country of the European Union and / or to countries outside the EU. In this case, the Controller already ensures that the transfer of data outside the EU will take place in compliance with the applicable legal provisions, by entering into, if necessary, agreements that guarantee an adequate level of protection and / or adopting the standard contractual clauses provided for by the European Commission.

6. The period for which the personal data are stored

The data provided for the purposes referred to in point 2) above, will be processed for the amount of time required to respond to the contact request.

If, subsequently to the contact request, a contractual relationship of any kind or a professional mandate between the Parties is entered into at a later date, such data will be kept for the entire duration of the relationship or professional mandate. Once the relationship or professional mandate is concluded, in order to protect the rights of the Controller, such data will be stored - so as to be accessible only in case of need - for a period of time corresponding to the limitation period of any rights that you might claim against the Controller. This period varies depending on the type of data and on any interruptions or suspensions of the limitation period.

At the expiration of these data retention periods, the data collected will be removed from any IT and / or paper support.

With regards to the data provided by you in order to receive commercial information, newsletters and periodic information, where such services are made available on this website, they will be processed until your request to cancel your subscription.

7. Data Subject's rights

You may exercise, in relation to the processing of data described therein, the rights provided by the applicable legislation on personal data protection, including the right to:

- receive confirmation of the existence of your personal data and access their content and information about their origin and obtain a copy (right of access);
- request further information about the methods and purposes of the processing of personal data;
- update, modify and / or correct your personal data (right to rectification);
- request the erasure, restriction or blocking of the processing of data processed in breach of the law, including those that do not need to be kept for the purposes for which the data were collected or otherwise processed, or request their transformation into an anonymous form and / or the erasure of the data stored in our archives pursuant to Articles 17 and 18 of the GDPR (right to be forgotten and right to restriction);
- object to processing based on legitimate interests (right to object);
- withdraw your consent, if given, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal;
- know the entities or categories of entities to which personal data may be communicated or which can become aware of them, as appointed representative in the territory of the State, managers or authorized entities;
- know the period for which the personal data are stored, or the criteria used to determine this period;
- object to the processing of your personal data for the purpose of sending newsletters, advertising material or commercial communications;
- lodge a complaint with the Supervisory Authority in the event of a breach of the rules on personal data protection.

The Data Subject may exercise these rights at any time by sending a registered letter with return receipt to the following address: CDR & ASSOCIATI S.r.l., Via Tiziano, n. 32, 20145 - Milan (Italy), or by sending a certified email to the following address: cdreassociati@pec.it or an e-mail to the following address: info@cdreassociati.it

8. Processing of data relating to natural persons other than the Data Subject connected with his / her organisation and the task assigned

During the processing of the personal data you have provided, the Controller, and the other entities referred to in clause 4) above may occasionally also process data relating to other persons within your company, where present in the information you have sent. If this happens, you declare, under your own responsibility, that you have shown this privacy statement to the interested parties and that it has been understood and - as far as necessary - accepted by them. Furthermore, you undertake to communicate to the Controller any updates concerning the data of these persons.