

**PRIVACY POLICY PURSUANT TO ARTICLES 13 – 14 EU. REG. NO. 679/2016
FOR THE PROCESSING OF PERSONAL DATA OF CUSTOMERS**

The Company **Adria Congrex Srl**, with registered office in Rimini (RN), Via Sassonia 30 VAT No./Fiscal Code: 01081310409, in the person of its legal representative pro tempore, as **DATA CONTROLLER**, hereby informs you pursuant to Art. 13 and 14 of EU Regulation no. 2016/679 (hereinafter '**GDPR**') that the data you provide will be processed in the following manner and for the following purposes:

1. Subject of the processing

The Data Controller, to establish and manage its continuing relationship with you, processes:

- a) your non-specific, identifying, contact and tax data (e.g. first name, surname, company name, address, phone number, email, bank and payment references, etc.);

2. Purposes and legal basis of the processing

Your personal data is processed:

- a) Without your express consent (Art. 6 GDPR) for the following purposes:
 - Concluding contracts for the Data Controller's services;
 - To fulfil pre-contractual, contractual and tax obligations arising from existing relations with you;
 - To fulfil obligations required by law, regulations, EU legislation or an order of the Authority (e.g. issue of invoices);
 - To exercise the Data Controller's rights (e.g. treasury management, right of defence in court, etc.).

The Data Controller also processes your personal data for marketing and communication purposes:

- b) Without your express consent (Art. 6(f) GDPR), but with the right to object to the processing (opt out), to:
 - Exercising a legitimate interest of the Data Controller, such as the sending, through mailing operations, of commercial communications about services offered by the Data Controller (similar to those already purchased) and surveying the level of satisfaction with the quality of the services, as set out in Art. 130, paragraph 4, Privacy Code (Italian Legislative Decree 196/2003, as amended by Italian Legislative Decree 101/2018).

3. Nature of data provision and consequences of failure to provide data

The provision of data for the purposes referred to in point **2.a)** is obligatory and does not require consent. Without this data, we will be unable to provide our services.

The use of your contact data for the purposes of point **2.b)** does not require consent. However, you may at any time opt out of the processing of the data already provided for these purposes by sending an email to privacy@adriacongrex.it or by using the unsubscribe link you will find at the bottom of any communication you receive. In this case, you will not receive commercial communications by email about services offered by the Data Controller similar to the ones you have already purchased. However, you will continue to be entitled to the services referred to in section **2.a)**.

4. Data access

Your data may be made accessible for the purposes set out in point 2:

- To employees and contractors of the Data Controller in their capacity as Persons in charge of processing and/or system administrators;
- To third-party companies or other entities (for example: professional firms, consultants, software houses that provide management software, credit institutions, insurance companies, etc.) that perform outsourcing activities on behalf of the Data Controller, in their capacity as external Data Processors.

5. Data communication

The Data Controller may disclose your data to the Public Administration, Supervisory Bodies and/or Judicial Authorities, and to all other entities to whom disclosure is mandatory or required by law. Your data will not be disclosed.

6. Data transfer

We inform you that we generally try to avoid transferring data outside the European Union. In any case, it is understood that the Data Controller, if necessary, will have the right to transfer data to non-EU countries. In this case, the Data Controller ensures from now on that the transfer of data outside the EU will take place in compliance with the applicable legal provisions by stipulating, if necessary, agreements that guarantee an adequate level of protection and/or adopting the standard contractual clauses provided by the European Commission and/or binding corporate rules.

7. Data retention

All personal data provided will be processed in compliance with the principles of lawfulness, correctness, relevance and proportionality, only with the methods, including computer and telematic, strictly necessary to pursue the purposes described above.

The personal data referred to in Art. **2.a)** will be retained for 10 (ten) years from the last registration date (in compliance with Art. 2220 c.c.).

The personal data mentioned in Art. **2.b)** are retained for 36 months from the date of the last interaction with the user. Please note that the information systems used to manage the information collected are configured, from the outset to

minimise the use of personal data.

8. Rights of the Data Subject

Pursuant to Articles 15 to 22 of EU. Reg. no. 679/2016, the Data Subject is entitled to exercise specific rights. In particular, the Data Subject has the right to: a) obtain confirmation of the existence of processing of personal data concerning them and, in this case, access to such data; b) obtain rectification of inaccurate personal data and the integration of incomplete personal data; c) obtain the cancellation of personal data concerning him, in cases where this is permitted by the Regulation; d) limitation of processing, in the hypotheses provided for by the Regulations; e) obtain communication, to the recipients to whom the personal data have been transmitted, of the requests for rectification / cancellation of personal data and for the limitation of processing received by the Data Subject, unless this proves impossible or implies a disproportionate effort; f) receive, in a structured format, commonly used and readable by an automatic device, of the personal data provided to the Data Controller, as well as the transmission of the same to another data controller, and this in any at the moment, even at the termination of any relationships maintained with the Data Controller; g) oppose at any time, for reasons connected with their particular situation, to the processing of personal data concerning them pursuant to Article 6, paragraph 1, letters e) or f), including profiling based on these provisions. If personal data are processed for direct marketing purposes, the Data Subject has the right to object at any time to the processing of personal data concerning them for these purposes, including profiling to the extent that it is connected to such direct marketing; h) not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or which significantly affects their person; i) complain to an authority of control pursuant to Art. 77.

9. How to exercise rights

You may exercise your rights at any time by contacting the Data Controller at the following email address: privacy@adriacongrex.it

10. External Data Processors and Persons in charge of processing

The updated list of the external Data processors and Persons in charge of processing is kept at the Data Controller's registered office.

11. Right to complain to the Data Protection Authority

Should you feel that the processing violates your rights in any way, you can complain to the Data Protection Authority, as provided for in Art. 77 of the GDPR, by checking the procedures on the website www.garanteprivacy.it.

12. Data protection officer (DPO)

Pursuant to Art. 38 of EU. Reg. no. 679/2016, we inform you that the Data Controller has appointed as DATA PROTECTION OFFICER of the company CONSULENTI PRIVACY SRL, with registered office at Via Valentini 11, Tax Code and VAT number 04391970409, Tel. 0541 1798723, Email dpo@adriacongrex.it, PEC privacy.consultants@postaleg.it