

## DATA PROTECTION - PRIVACY NOTICE

- This data protection statement has been drafted in accordance with and for the purposes of Article 13 of the European Regulation of 27 April 2016, no. 679 (also known as "GDPR"), concerning the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data, in force since 4 May 2016 and definitively applicable immediately in all EU countries as of 25 May 2018.
- In particular, pursuant to Articles 12, 13 and 14 of the GDPR, with this communication, the Data Controller identified below wishes to provide its customer (hereinafter "the data subject") with all the information necessary to enable him/her to understand how personal data will be processed.
- The Data Controller will provide the data subject with the following information in a concise, transparent, intelligible and easily accessible form, language.
- Please note that if the data subject already has all the information required by the GDPR, the Data Controller is not required to provide details of the data protection statement.

### 1. DETAILS AND CONTACT INFORMATION FOR THE JOINT DATA CONTROLLERS.

**STUDIO TRIBERTI COLOMBO.**, with Registered Office in Via Carducci n. 32, Milan – , Tax Code and VAT No. 10444880156 and **TC&A ACCOUNTING SRL** with Registered Office in Via Carducci n. 32, Milan – , Tax Code and VAT No. 10145950969

In compliance with GDPR provisions, we inform that the data supplied shall be treated from STUDIO TRIBERTI COLOMBO E ASSOCIATI and from TC&A ACCOUNTING SRL, co-holder of the data treatment pursuant art. 26 EU Reg. 679/2016 (both together referred to as "Holder"). The contact for those concerned according to art. 26 paragraph 1 GDPR is TC&A ACCOUNTING SRL, e-mail address [privacy@tcapartners.it](mailto:privacy@tcapartners.it)

### 2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER.

There is currently no provision for the appointment of a Data Protection Officer.

### 3. PURPOSE AND LEGAL BASIS OF DATA PROCESSING.

The data provided by the data subject will be treated as provided by the GDPR for carrying out the obligations arising from the professional relationship in place between the Data Controller and the data subject, in order to verify the needs of the data subject and offer and manage the services required, for operations of an administrative nature, as well as to fulfil specific obligations or follow specific tasks required by law.

In particular, we remind that the treatment in view of the professional services offered by the Holder may concern the following purposes: drawing-up of the tax declarations required by the law, accountability processing, drawing up of the balance sheet and of company documents, corporate and business consultancy, tax advice and tax litigations, auditing activities, management of insolvency proceedings, legal assistance and advice, money laundering fulfilments, domiciliations and secretarial services as well as any other purpose concerning the service required from the party concerned within the frame of the multidisciplinary professional activity of the Responsible for the Treatment, including any legal and contractual fulfilment even towards public or private individuals.

The legal basis of the data processing described above consists of the performance of the professional duties to which the data subject is party and of legal obligations (e.g. anti-money laundering regulations). The request for an expression of consent will be used only in the event that the Data Controller carries out processing of special categories of data pursuant to art. 9 GDPR (so-called sensitive data).

### 4. RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL DATA MAY BE COMMUNICATED.

The data will not be disclosed unless legally required to do so, and may be disclosed to third parties who operate in conjunction with and on behalf of the Data Controller, only in the performance of the professional service requested, to comply with the necessary contractual obligations, for the management of the commercial relationship, for operations of an administrative nature, legal and contractual advice, or for legal obligations. The data may be made available to the staff of the Data Controller who collaborate or who have to represent the Data Controller in the event of his or her absence. The data may be disclosed to secretarial staff, accounting and invoicing staff, and those responsible for the management and maintenance of the processing systems. The communication to the above-mentioned natural persons will in any case take place with an assurance that

the rights of the data subject will be protected as provided for in the GDPR. Your name may be entered in the Data Controller's telephone, fax and e-mail directories and you may receive periodic communications in electronic or paper form, but this is only for customers. Under legal obligations, for contractual or purely functional reasons within the contractual relationship, the data may be disclosed to social and welfare institutions and family members of the data subject, in whole or in part to public bodies (Ministry of Finance, Ministry of Welfare, INPS, INAIL, Labour Inspectorate, ASL, etc..) or natural persons (including credit institutions or banks, funds), as well as to natural persons or legal bodies responsible for making collections and payments or for providing contractual and legal advice.

**5. POSSIBLE TRANSFER OF PERSONAL DATA TO ANOTHER COUNTRY OR INTERNATIONAL ORGANISATION WITH INFORMATION REGARDING ANY PRIVACY GUARANTEES.**

There are no plans to transfer data outside the EU or to international organisations. In any case, should the need arise, the Data Controller shall verify whether or not there is a decision on its suitability by the EU Commission that guarantees an adequate level of data protection.

**6. RETENTION PERIOD FOR PERSONAL DATA OR CRITERIA USED TO DETERMINE SUCH PERIOD.**

The data will be stored in a form that allows the identification of data subjects and retained for no longer than is necessary for the purpose it was obtained for, consistent with other legal obligations. The Data Controller has a data retention procedure in place: in addition, for professional reasons the minimum retention period is currently 10 years.

**7. RIGHTS OF THE DATA SUBJECT**

The Data Controller informs you of the following rights:

a) right of access, rectification, cancellation, restriction, object:

the data subject may access his/her data at any time, request its rectification if incorrect, request the cancellation of excessive data but not those required by law by the Data Controller, and may limit access to the data to certain persons;

b) right to data portability:

The data subject has the right to receive his or her personal data provided to a data controller in a structured, commonly used and machine-readable format from an automatic device, and has the right to transmit such data to another data controller without hindrance by the data controller to whom he has provided them exclusively in the cases laid down in Article 20 of the GDPR;

c) right to withdraw the consent at any time:

the data subject may withdraw his/her consent at any time, understanding the consequences (including interruption of the professional assignment), without prejudice to the obligation for the Data Controller to continue to hold the personal data for processing when it is necessary to fulfil a legal obligation of the Data Controller or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

d) The right to lodge a complaint with a privacy supervisory authority.

**8. MANDATORY OR OPTIONAL NATURE OF THE PROVISION.**

The conferment of data is mandatory given the nature of the professional assignment that has been agreed between the data subject and the Data Controller.

**9. CONSEQUENCES OF REFUSAL TO REPLY.**

If the data subject refuses to provide the requested data, the Data Controller reserves the right to evaluate the consequences resulting from such refusal, which do not necessarily fully preclude the performance of the professional assignment received, unless the obligation to provide the requested data is directly required by law or is essential to the correct performance of the professional assignment itself. In the latter cases, if the data subject refuses to provide the requested data, the professional assignment cannot be carried out, whereas if this happens while it is being carried out, the commercial relationship will have to be terminated.

**10. EXISTENCE OF PROFILING ACTIVITIES OR AUTOMATED DECISION-MAKING PROCESSES, CRITERIA EMPLOYED AND CONSEQUENCES FOR THE DATA SUBJECT.**

No profiling activities shall be carried out with regard to the data subject or any form of automated processing of personal data consisting of the use of such personal data relating to an individual, in particular to analyse or



predict, for example, his or her financial circumstances, health, personal preferences, interests, reliability, behaviour, location or movements.