

PRIVACY NOTICE FOR CLIENTS

SUBJECT: INFORMATION NOTICE PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679 (GDPR)

This privacy notice is issued pursuant to and for the purposes of the EU General Data Protection Regulation 2016/679 (the "**Regulation**").

1. Data Controller

The Data Controller, that is, the entity responsible for decisions regarding the purposes, methods and security of the personal data processing, is HR Capital Consulting STP S.r.l. ("**HR Capital Consulting STP**" or the "**Controller**"), with registered offices at Galleria San Babila 4/B, Milan (MI), Italy, Tel. +39 02 36593033; e-mail: info@cons.hrcapital.it, PEC hrc-consultingstp@legalmail.it.

2. Purposes, legal bases, processing methods and data retention

Personal data may be collected from you or from third parties for the following purposes:

- (i) fulfilment of contractual obligations arising from a contract to which you are a party, or in which you represent the legal entity that is a party,
- (ii) compliance with legal obligations relating to accounting, administrative and tax requirements connected to the contract,
- (iii) establishment, exercise or defence of legal claims, before judicial or administrative authorities, directly or indirectly connected to the contractual relationship,
- (iv) performance of information and update activities, including sending newsletters, surveys and questionnaires, and invitations to seminars, conferences or other initiatives promoted by HR Capital Consulting STP.

In light of the above, the legal bases for the processing activities are to be found in the performance of a contract and pre-contractual measures (Article 6 (1)(b) of the Regulation), compliance with legal obligations (Article 6 (1)(c) of the Regulation), the legitimate interests of HR Capital Consulting STP (Article 6 (1)(f) of the Regulation), and the data subject's consent (Article 6 (1)(a) of the Regulation).

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Personal data will be processed both manually and by electronic means, lawfully and fairly, using systems designed to ensure the highest level of confidentiality and updated on an ongoing and timely basis.

Data will be retained for the following purposes:

- with regard to points (i), (ii) and (iii) for the duration of the contract and, subsequently, for as long as HR Capital Consulting STP is subject to retention obligations for tax purposes or for any other purposes required by laws or regulations,
- with regard to point (iv) for no longer than 2 years from the date on which HR Capital Consulting STP receives consent and, in any case, until such consent is withdrawn.

3. Provision of data and consequences of refusal

Providing personal data for purposes under (i), (ii) and (iii) above is mandatory and failure to provide such data may prevent the conclusion or proper performance of the contract.

Providing data for purpose (iv) is optional. Nevertheless, failure to provide consent will make it impossible to receive information and update communications.

HR Capital Consulting STP S.r.l.

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4. Data recipients and categories of processed data

Personal data may be disclosed to:

- factoring companies, credit institutions, credit recovery companies, credit insurance companies, business information providers,
- public and private entities, including following inspections or audits (such as, for example, Tax Authorities, Financial Police, Judiciary, Labour Inspectorate, Local Health Authorities, Social Security and Welfare Agencies, Chambers of Commerce),
- professionals, audit firms, consultancy companies, associations or professional practices providing services or advisory support to HR Capital Consulting STP, particularly - though not exclusively - in relation to accounting, administrative, legal and tax matters,
- supervisory authorities or other entities where disclosure is mandatory by law.

Personal data may also be accessed by individuals authorised and specifically instructed by HR Capital Consulting STP to carry out processing activities strictly necessary for the purposes referred to under point 2 above, acting under its direct authority, as well as by Data Processors appointed for this purpose pursuant to Article 28 of the Regulation.

5. Transfer of personal data to Third Countries

Personal data will not be transferred outside the European Union. In any case, HR Capital Consulting STP hereby ensures that any potential transfer of data outside the European Union will take place in compliance with the applicable legal provisions, by entering into agreements that guarantee an adequate level of protection and/or by adopting the standard contractual clauses issued by the European Commission, where necessary.

6. Rights of the Data Subject

The Regulation grants the following rights, which the data subject may exercise against the Data Controller.

Right of access: Article 15 of the Regulation entitles the data subject to obtain from the Data Controller confirmation as to whether or not personal data concerning them are being processed and, if so, to obtain access to such data.

Right to rectification: Article 16 of the Regulation entitles the data subject to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, also by providing a supplementary statement.

Right to erasure: Article 17 of the Regulation entitles the data subject to obtain from the Data Controller, without undue delay, the erasure of personal data concerning them where one of the grounds provided for by the Regulation applies.

Right to restriction of processing: Article 18 of the Regulation entitles the data subject to obtain from the Data Controller the restriction of processing where one of the circumstances provided for by the Regulation applies.

Right to object: Article 21 of the Regulation entitles the data subject to object, at any time and on grounds relating to their particular situation, to the processing of personal data concerning them carried out pursuant to Article 6(1)(e) or (f), including profiling based on those provisions.

Right to data portability: Article 20 of the Regulation entitles the data subject to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used and machine-readable format, and to transmit those data to another Data Controller without hindrance from the Data Controller to which the data were provided, under the conditions set forth in the Regulation.

Right to withdraw consent: Article 7 of the Regulation entitles the data subject to withdraw consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Right to lodge a complaint: Article 77 of the Regulation entitles the data subject, if they consider that the processing of personal data relating to them infringes the Regulation, to lodge a complaint with a supervisory authority, in particular in the EU Member State of their habitual residence, place of work, or place of the alleged infringement (for Italy, the Italian Data Protection Authority, whose institutional website is www.garanteprivacy.it).

7. Further information

Any requests to exercise the data subject's rights may be submitted in writing, by sending the Form for exercising rights in the field of personal data protection - available at <https://www.garanteprivacy.it/home/modulistica-e-servizi-online> duly completed and accompanied by a copy of a valid identification document - to the Data Controller as identified above.

8. Processing of personal data relating to natural persons other than the data subject, connected with the data subject's organization and the executed contract

In the course of processing the personal data provided by you, the Data Controller and the other entities referred to in point 4 above may also process data relating to other individuals within your organization. Should this occur, you hereby declare, under your own responsibility, that you have shown this notice to the data subjects and that it has been understood and, where necessary, accepted by them. Furthermore, you undertake to inform the Data Controller of any updates regarding the data of such individuals.

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This notice fully replaces and supersedes any previous version, which shall be deemed no longer valid.

Kind regards.

HR Capital Consulting STP S.r.l.

Acknowledgement of receipt and acceptance:

Having read and acknowledged the above Privacy Notice and the purposes of the processing of my personal identification data by HR Capital Consulting STP S.r.l.:

I CONSENT I DO NOT CONSENT

to the processing of my personal data for the performance of updating and information activities, through the sending of newsletters, surveys and questionnaires, invitations to seminars, conferences or other initiatives of the same nature.

Date and signature:
