

Nava Viganò Revisori Associati

società fiduciaria e di revisione contabile

PRIVACY DISCLOSURE

Dear ... (Customer/Supplier), please be informed that the European Regulation (EU) no. 679/2016 (General Data Protection Regulation - GDPR), and Legislative Decree no. 196/2003 (Privacy Code), as amended by Legislative Decree 101/2018, set out rules for the protection of individuals with regard to personal data processing and free movement of such data.

The Data Controller is **Nava Viganò Revisori Associati** srl and acquires/keeps and processes personal data under business agreements (pre-contractual and contractual agreements, mandates, engagement letters) for the following purposes:

- compliance with administrative, management, accounting, civil and tax obligations;
- customer management (customer administration, contract administration, orders, shipments and invoices, reliability and solvency control);
- internal control services (safety, productivity, quality of services, integrity of assets);
- detection of the degree of customer satisfaction;
- planning of activities (planning and monitoring of tasks, work volume and work performance);
- management of disputes (breach of contract, warnings, transactions, debt collection, arbitration, legal disputes);
- traffic data processing for fraud detection;
- purposes envisaged by anti-money laundering legislation.

The treatment is carried out in paper and/or electronic form; by telematic and/or computing means also through automated tools for storing, managing and transmitting the same data, in compliance with all precautionary measures, which ensure the security and confidentiality. Specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorized access.

- In paper, the data are processed and stored at the headquarters and offices of the company
- In electronic form, at the computers/devices of the Company, Servers managed by the Company and virtual servers as part of cloud services provided by Readytec Milano srl.

The provision of data relating to name, surname, company name, work address, registered office address, tax code, VAT number, telephone number, fax number or e-mail and other data necessary to fulfill legal obligations is optional but any refusal to provide such data may result in the failure to continue the relationship. The provision of other personal data by persons considering relations with our company, even if purely for information on our activities and services, is also to be considered optional.

In relation to the Purposes described above, in addition to the personal data of the Customer / Supplier as a natural person, also those of natural persons operating in the name and on behalf of the Customer / Supplier are necessarily processed.

The data will not be disseminated without restriction, meaning to give knowledge to indeterminate persons in any way, including through their provision or access.

The data may be communicated, meaning the giving of knowledge (even for any processing) to one or more persons determined within the limits strictly relevant to the fulfillment of obligations, tasks and purposes mentioned above:

- to any person who is granted access to such data by virtue of regulatory measures (e.g. police, judicial authorities, financial administration, financial police, judicial offices, etc.);
- to customers, suppliers, factoring companies, debt collection companies, credit insurance companies;
- to post offices, couriers and carriers to deliver documentation and/or material;
- to all those natural and/or legal, public and/or private persons (legal, administrative, accounting and tax consultancy firms, labour consultancy firms, judicial offices, chambers of commerce, chambers and labour offices, etc.) when communication is necessary or functional to the performance of our activities and in the

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ways and for the purposes indicated above;

- banks and financial institutions in general for the management of receipts and payments deriving from the execution of contracts.

In addition, the following personal data may be disclosed to:

- Data processors, our employees and collaborators as well as third parties who provide the Company with administrative, IT, logistical and advisory services, operating by virtue of a specific assignment.

Data subject may obtain an updated list of our Data Processors by requesting it by mail or e-mail at the addresses indicated below.

No Data will be transferred outside the Single European Area.

The data subject is entitled to the following rights under Articles 15 to 22 hereof;

Right of access:

the data subject shall have the right to obtain confirmation as to whether or not personal data concerning him or her are being processed, and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.

Right to erasure

Data subject shall have the right to obtain the erasure of personal data where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based;
- c) the data subject objects to the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Right to restriction of processing

Data subject shall have the right to obtain restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject;

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- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
- d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

Notification obligation

Data subject is obliged to communicate any rectification, erasure or restriction of the processing of personal data to each recipient to whom the data were communicated. If the Data Subject so requires, the Data Controller shall inform the Data Subject as regards the recipients the personal data have been sent to.

Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format. The data subject shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

Right to object

The data subject shall have the right to object at any time to processing of personal data concerning him or her. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims

Requests to exercise your rights, as indicated above, may be submitted by mail to the Data Controller Nava Viganò Revisori Associati srl at the address via Paleocapa n. 6 - 20121 Milan, or by fax at the number +39 02 89098717, or by certified email at nv@legalmail.it.

The data subject is always entitled to lodge a complaint with the Data Protection Authority. (www.garanteprivacy.it).

Data will be kept for 10 years from the contract term date or from the termination of the relationship and / or for a period necessary to pursue the purposes and fulfillment of civil and tax regulations and any other legal requirement.

NAVA VIGANO' REVISORI ASSOCIATI SRL

