

PRIVACY POLICY

ex Article 13 of EU Regulation 2016/679

1. Who are we and why are we providing this document?

RisorSe snc considers the protection of personal data of its own and / or potential customers and users of fundamental importance, ensuring that the processing of personal data, carried out in any way, both automated and manual, takes place in full compliance with the protections and rights recognized by the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data, as well as on the free movement of such data (hereinafter the "**Rules**") and further applicable rules on the protection of personal data.

With the term personal data, reference is made to the definition contained in article 4 in point 1) of the Regulation, ie *"any information concerning an identified or identifiable natural person; an identifiable natural person can be identified, either directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online ID or one or more characteristic elements of his physical identity, physiological, genetic, psychological, economic, cultural or social"* (hereinafter the "**Personal Data**").

The Regulation provides that, before proceeding with the processing of Personal Data - with this term having to understand, according to the relative definition contained in Article 4 in point 2) of the Rules, *"any operation or set of operations, performed with or without the support of automated processes applied to personal data or sets of personal data, such as collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, the communication by transmission, diffusion or any other form of making available, the comparison or the interconnection, the limitation, the cancellation or the destruction"* (hereinafter the "Treatment") - it is necessary that the person to whom such Personal Data they belong to be informed about the reasons for which such data are requested and how they will be used.

In this regard, this document is intended to provide you, in a simple and intuitive, all the useful and necessary information so that you can give your personal data in a conscious and informed and at any time, request and obtain clarification and / or adjustments.

The present informative note, therefore, has been drawn up on the basis of the principle of transparency and all the elements required by Article 13 of the Rules and is divided into individual sections (hereinafter "**Sections**" and individually "Section") each of which deals with one specific topic in order to make the reading faster, easier and easier to understand (hereinafter the "Information").

If necessary, this Notice may be accompanied by a specific form for the issue of consent as provided for in Article 7 of the Rules, articulated on the basis of the additional type of use that we intend to make of your Personal Data.

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2. Who will process your Personal Data?

The company that will process your Personal Data that will hold the role of data controller according to the relative definition contained in Article 4 in point 7) of the Rules, "*the natural or legal person, public authority, service or other body that, individually or together with others, determines the purposes and means of processing personal data*" is: **RisorSe snc** with registered office in Via Caprera 6, 37126 Verona, registered with the Verona Business Register, Tax Code and VAT no. 034449000231 (hereinafter the "**Data Controller**").

3. Who can you contact?

In order to facilitate relations between you, as an interested party, ie the "*identified or identifiable natural person*" referred to in the Personal Data pursuant to Article 4 in point 1) of the Rules (hereinafter the "**Interested Party**") and the Data Controller and / or the Data Controllers of the Treatment, the Regulation has provided, in some specific cases, the appointment of a control and support figure who, among the various tasks assigned, acts also as a point of contact with the Data Subject.

RisorSe snc has adopted this figure of "**data protection officer**", c.d. "**Data Protection Officer**", identifying and appointing, pursuant to Rule 37 of the Rules, Andrea Bennardo (hereinafter the "**DPO**"). The DPO, pursuant to and for the purposes of article 39 of the Regulations, is called to perform, inter alia, the following activities:

- to inform and provide advice to the Data Controller, the controller and the employees carrying out the processing regarding the obligations deriving from the Regulation as well as other provisions of the Union or the Member States concerning the protection of Personal Data;
- to monitor and monitor compliance with the Regulations, the applicable regulations regarding the protection of Personal Data and the policies and procedures adopted by the Data Controller;
- to provide support in feedback to the interested party;
- to cooperate with the competent Data Protection Authority.

As foreseen by article 38 of the Regulations, you can freely contact the DPO for all matters relating to the processing of your Personal Data and / or if you wish to exercise your rights as set out in Section I of this Information, by sending a written communication to the e-mail address risorseurl@mypec.eu / or by writing to the Data Protection Officer of RisorSe snc Via Caprera 6, 37126 Verona and / or by calling the number +39 045 8408129.

At any time you can consult the "Privacy" section of the Website: www.risorse-hr.it within which you will find all the information concerning the use and processing of your Personal Data, updated information on the contacts and channels of communication made available to all Interested by the Owner of the Treatment.

4. For what main purpose will your Personal Data be processed?

The Data Controller, in order to allow your registration to their websites, if provided the opportunity to register, and / or sending requests for information using the contact forms and / or subscription to the newsletter service, you need to collect some of your Personal Information as requested in the registration form on the Website. The processing of your Personal Data will

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be conducted by the Data Controller to allow you, therefore, to access your profile, participate in the initiatives promoted through the Website, receive newsletters, send requests for information and take advantage of all other services, from time to time in turn, offered by the Internet site you have registered and / or in which you are browsing; The processing of your Personal Data will be legally based on the contractual relationship that will be created between you and the Data Controller as a result of your acceptance of the conditions for participation on the Website.

To allow the Data Controller to carry out the processing activities for the above purposes, it will be necessary to provide the Personal Data marked with the symbol *. In the absence of even one of the marked data, it will not be possible to process your Personal Data and, consequently, you will not be allowed to complete your registration on the Internet Sites and / or benefit from the services provided by them for which requested a provision of Personal Data.

The Personal Data that will be required for the pursuit of the aforementioned purposes will be those indicated in the registration and / or contact form, that is, by way of example and not exhaustively: name, surname, company, job title, e-mail address, telephone numbers of fixed and / or mobile users.

If you decide to access the Website through the use of your social profile, where provided, the collection of your Personal Data will be carried out by the Data Controller at third parties or at the manager of the social you used to access the Internet site. In this case you will be able to read this information in the Privacy section of the site.

5. Additional purposes

The Data Controller with your express consent, free and unequivocal pursuant to Article 6, paragraph 1, point a) of the Rules, may request, in addition to the above data, additional Personal Data such as, by way of example and not exhaustive, data related to tastes, preferences, habits, needs, for the following purposes:

- **Purpose of direct marketing:** this term means the will to carry out promotional and / or marketing activities towards you. This category includes all the activities carried out to promote products, services, sold and / or supplied by the Contracting Parties on the basis of their legitimate interest in pursuing their business purpose.
- **Purpose of indirect marketing:** this term means the will to carry out promotional and / or marketing activities on behalf of third parties. This category includes all the activities carried out to promote products, services, sold and / or supplied by third parties.
- **Purpose of profiling:** with this term we mean the willingness to profile or evaluate your tastes, preferences and consumption habits also related to market surveys and statistical analysis. This category includes any form of automated processing of Personal Data to evaluate certain personal aspects such as those concerning, but not limited to, professional performance, economic situation, personal preferences, interests, reliability, behavior, location or travel.

The processing of your Personal Data for the purposes referred to in points (ii) and (iii) cannot disregard the receipt of your consent that will necessarily comply with the conditions set out in Article 7 of the Rules, thus determining the lawfulness of the processing of your personal data. With regard to the direct marketing purpose referred to in point (i), it should be noted that, pursuant to Article 6, paragraph 1, point f) of the Rules, the Data Controller may carry out this activity based on its legitimate interest, disregard your consent and in any case up to your

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objection to this Treatment as better explained in Recital 47 of the Regulation, in which "*it is considered legitimate interest to process personal data for direct marketing purposes*". This will also be possible following the evaluations made by the Data Controller regarding the possible and possible prevalence of your interests, fundamental rights and freedoms that require the protection of Personal Data on its legitimate interest in sending direct marketing communications.

The contact modalities aimed at direct, indirect and profiling marketing activities as in the previous points (i), (ii) and (iii), may be either automated (email, sms, fax, telephone calls without operator) and traditional type (telephone calls with operator, postal items). In any case, and as detailed below in Section H, you can revoke your consent, even partially, for example by consenting to traditional methods of contact.

With regard to the methods of contact that provide for the use of your telephone contacts, we remind you that the direct marketing activities by the Data Controller will be carried out after verification of your possible registration in the Register of Oppositions as established pursuant to and for effects of the Presidential Decree September 7, 2010, n. 178 and subsequent modifications.

6. To which subjects can your Personal Data be communicated?

Your Personal Data may be disclosed to specific subjects considered recipients of such Personal Data. In fact, Article 4 in point 9) of the Rules defines as the recipient of a Personal Data "*the natural or legal person, public authority, service or another body that receives communication of personal data, whether or not it is of third parties*" (hereinafter the "**Recipients**").

With this in mind, in order to correctly perform all the Processing activities necessary to pursue the purposes set out in this Notice, the following Recipients may be in a position to process your Personal Data:

third parties who perform part of the processing and / or activities connected and instrumental to them on behalf of the Data Controller or the Data Controllers of the Processing. These persons have been appointed as data processors, having to understand each other individually, in accordance with Article 4, paragraph 8, of the Regulation, "*the natural or legal person, public authority, service or other body that processes Personal Data. on behalf of the Data Controller*" (hereinafter the "Data Processor");

- individuals, employees and / or collaborators of the Data Controller or of the Joint Data Controllers, who have been entrusted with specific and / or more processing activities on your Personal Data. These individuals have been given specific instructions on the safety and correct use of Personal Data and are defined, in accordance with Article 4 paragraph 10) of the Regulation, "*persons authorized to process Personal Data under the direct authority of the Data Controller or the Data Processor*" (hereinafter the "Authorized Persons").

- If required by law or to prevent or suppress the commission of a crime your Personal Data may be disclosed to public bodies or judicial authorities without being defined as Recipients. In fact, pursuant to article 4 of point 9) of the Regulation, "*public authorities that may receive communication of Personal Data in the context of a specific investigation in accordance with Union or Member State law are not considered Recipients*".

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7. How long will your Personal Data be processed?

One of the principles applicable to the processing of your Personal Data concerns the limitation of the retention period, governed by Article 5, paragraph 1, point e) of the Regulation that states *"Personal Data are stored in a form that allows the identification of data subjects for a period of time not exceeding the achievement of the purposes for which they are processed; Personal Data may be stored for longer periods provided they are processed exclusively for archival purposes in the public interest, for scientific or historical research or for statistical purposes, in accordance with Article 89, paragraph 1, without prejudice to the implementation of technical measures and adequate organizational requirements required by this regulation to protect the rights and freedoms of the interested party"*.

In light of this principle, your Personal Data will be processed by the Data Controller only for what is necessary for the pursuit of the purpose referred to in paragraph 4 of this Information. In particular, your Personal Data will be processed for a period of time equal to the minimum necessary, as indicated in Recital 39 of the Rules, ie until the termination of the contractual relations between you and the Data Controller without prejudice to an additional retention period which may be imposed by law as also provided for by Recital 65 of the Rules.

8. Is it possible to revoke the consent given and how?

As required by the Regulations, if you have given your consent to the processing of your Personal Data for one or more purposes for which you have been requested, you can, at any time, withdraw it totally and / or partially without prejudice to the lawfulness of the treatment based on the consent given before the revocation.

The methods of revoking consent are very simple and intuitive, just contact the Data Controller and / or the DPO using the contact channels reported in this information and respectively in sections C and I.

In addition to the above and for simplicity, if you were in the position to receive advertising emails that are no longer of your interest, just click on the *unsubscribe* button at the bottom of the same to no longer receive any communication through other channels contact for whom your consent was obtained (SMS, paper mail, fax, phone calls).

9. What are your rights?

As required by Article 15 of the Rules, you can access your Personal Data, request correction and updating, if incomplete or erroneous, request cancellation if the collection was made in violation of a law or regulation, as well as oppose to the treatment for legitimate and specific reasons.

In particular, we list below all your rights that you can exercise, at any time, against the Data Controller:

Right of access: you will have the right, in accordance with Article 15, paragraph 1 of the Rules, to obtain from the Data Controller the confirmation that a Personal Data Processing is in progress and, if so, to obtain the access to such Personal Data and to the following information: a) the purposes of the processing; b) the categories of Personal Data in question; c) Recipients or categories of Recipients to whom your Personal Data have been or will be communicated, in particular if Recipients of third countries or international organizations; d) whenever possible, the

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retention period of the Personal Data provided or, if not possible, the criteria used to determine this period; e) the existence of the right of the interested party to request the Data Controller to rectify or delete Personal Data or limit the processing of personal data concerning him or to oppose their processing; f) the right to lodge a complaint with a supervisory authority; g) if the Personal Data are not collected from the Data Subject, all information available on their origin; h) the existence of an automated decision-making process, including the profiling referred to in Article 22, paragraphs 1 and 4 of the Rules and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such treatment for the interested party. All this information can be found in this information that will always be available to you within the privacy section of each of the Internet sites.

• Right of rectification: you can obtain, in accordance with Article 16 of the Regulation, the correction of your Personal Data that are incorrect. Taking into account the purposes of the processing, moreover, you can obtain the integration of your Personal Data that are incomplete, also by providing an additional declaration.

• Right to cancel: you can obtain, in accordance with Article 17, paragraph 1 of the Rules, the cancellation of your Personal Data without undue delay and the Data Controller will have the obligation to delete your Personal Data, if there is even one of the following reasons: a) Personal Data are no longer necessary with respect to the purposes for which they were collected or otherwise processed; b) you have withdrawn the consent on which the processing of your Personal Data is based and there is no other legal basis for their processing; c) you are opposed to the processing pursuant to Article 21, paragraph 1 or 2 of the Rules and there is no longer any legitimate overriding reason to proceed with the processing of your Personal Data; d) your Personal Data has been processed unlawfully; e) it is necessary to delete your Personal Data in order to comply with a legal obligation provided for by a community or national law. In some cases, as foreseen by article 17, paragraph 3 of the Regulation, the Data Controller is entitled not to provide for the cancellation of your Personal Data if their processing is necessary, for example, for the exercise of the right to freedom of expression and information, for the fulfillment of a legal obligation, for reasons of public interest, for purposes of archiving in the public interest, scientific or historical research or for statistical purposes, for the assessment, exercise or defense of a right in court.

Right to limit the processing: you can obtain the limitation of treatment, in accordance with Article 18 of the Rules, if one of the following hypotheses occurs: a) you have contested the accuracy of your Personal Data (the limitation will continue for the period necessary for the Data Controller to verify the accuracy of such Personal Data); b) The processing is illegal but you are opposed to the deletion of your Personal Data asking, however, that it is limited use; c) although the Data Controller no longer needs it for the purposes of processing, your Personal Data are used for the assessment, exercise or defense of a right in court; d) you are opposed to the processing pursuant to Article 21, paragraph 1, of the Rules and you are awaiting the verification of the possible prevalence of the legitimate reasons of the Data Controller with respect to yours. In case of limitation of treatment, your Personal Data will be processed, except for storage, only with your consent or for the assessment, exercise or defense of a right in court or to protect the rights of a other natural or legal person or for reasons of significant public interest. We will inform you, in any case, before this limitation is revoked.

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• Right to data portability: you can, at any time, request and receive, pursuant to Article 20, paragraph 1 of the Rules, all of your Personal Data processed by the Data Controller and / or the Joint Data Controllers in a structured format, in common and legible use or request the transmission to another holder of the treatment without impediments. In this case, it will be your responsibility to provide us with all the exact details of the new data controller to whom you intend to transfer your Personal Data by providing written authorization.

• Right to oppose: pursuant to Article 21, paragraph 2 of the Rules and as also reiterated by Recital 70, you may object, at any time, to the processing of your Personal Data if these are processed for direct marketing purposes, including profiling to the extent that it is related to such direct marketing.

• The right to lodge a complaint with the supervisory authority: without prejudice to your right to appeal to any other administrative or jurisdictional office, if you believe that the processing of your Personal Data carried out by the Data Controller and / or the Data Controllers is in violation of the Regulations and / or applicable legislation you can lodge a complaint with the competent Data Protection Authority.

To exercise all your rights as identified above, simply contact the Data Controller in the following ways:

- writing to the DPO at the address: RisorSe via Caprera 6, 37126 Verona
- sending an e-mail to the risorsesrl@mypec.eu e-mail address to the attention of the DPO
- by calling the telephone number +39 045 8408129 and asking for the DPO

10. Where will your Personal Data be processed?

Your Personal Data will be processed by the Data Controller within the territory of the European Union.

If for technical and / or operational reasons it is necessary to make use of subjects located outside the European Union, we inform you from now on that these subjects will be appointed as Data Processors pursuant to and for the purposes of article 28 of the Regulations and the transfer of your Personal Data to these subjects, limited to the performance of specific treatment activities, will be regulated in accordance with the provisions of Chapter V of the Rules. All necessary precautions will therefore be taken to ensure the fullest protection of your Personal Data by basing this transfer: (a) on adequacy decisions of the third country recipients expressed by the European Commission; (b) on appropriate guarantees expressed by the recipient third party pursuant to Article 46 of the Rules; (c) on the adoption of binding corporate rules, *c.d. corporate binding rules*.

In any case you can request more details from the Data Controller if your Personal Data have been processed outside the European Union requesting evidence of the specific guarantees adopted.

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24 May 2018

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