PRIVACY POLICY

PURSUANT TO REGULATION (EU) 2016/679 AND LEGISLATIVE DECREE 196/2003 AND SUBSEQUENT AMENDMENTS

This information is provided in compliance with the provisions of Community legislation (EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, hereinafter referred to for brevity as "GDPR") and the national legislation in force on the matter.

DATA CONTROLLER

The Data Controller is C&C S.P.A., with registered office in Viale Einaudi n. 10 - 70125 Bari (BA), (e-mail: privacy@cec.com, PEC: info@pec.cecconsulting.it, Tel.: 080 5622398).

DATA PROTECTION OFFICER

The Data Protection Officer (DPO) can be contacted by e-mail at the following address: dpo@cec.com, or by registered mail with return receipt (C.A. Data Protection Officer) at the following address: C&C S.P.A. - Viale Einaudi n. 10 - 70125 Bari (BA).

PURPOSE, LEGAL BASIS AND STORAGE PERIOD

Purpose of processing	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
Performance of the contract for the provision of the requested service/product. Sending reminder or service communications.	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. In the event of a dispute, pursuing the legitimate interest of the controller in defending its rights.	For the duration of the contractual relationship and, after termination, for the period provided by law. In the event of any dispute, for the entire duration of the dispute, until the time limit for bringing legal action has expired.
Fulfillment of tax and accounting obligations.	Compliance with a legal obligation to which the controller is subject.	For the duration of the contractual relationship and, after termination, for the period provided by law.
Direct promotional activities using the email addresses provided by the data subject in the context of the supply of the product or service.	Legitimate interest of the controller.	Until the purposes are achieved. The data subject has the right to object to the processing of his or her personal data at any time, free of charge and in a simple manner.

Your personal data will be processed at the head office located in Viale Einaudi n. 10 - Bari (BA), as well as at the operational offices, and will be carried out in an automated and manual manner, using methods and tools designed to guarantee maximum security and confidentiality, by persons expressly authorized for the time strictly necessary to achieve the purposes for which they were collected.

The data provided will be used with paper, IT and telematic tools.

Specific security measures are observed to prevent data loss, unlawful or incorrect use, and unauthorized access.

After the aforementioned retention periods, the data will be destroyed or anonymized, in accordance with the technical deletion and backup procedures.

NATURE OF THE DATA PROVISION AND REFUSAL

The provision of personal data is mandatory for the conclusion and execution of the contract, as well as for the fulfillment of legal obligations. Therefore, any partial or complete refusal or inaccurate indication of such data will make it impossible for the Data Controller to correctly execute the contract and/or all related obligations.

With reference to the direct promotional activities carried out by the Data Controller using email addresses, it is possible to object to the processing at any time.

DATA RECIPIENTS

According to Article 28 of the Regulation, the following entities will be recipients of the collected data and will therefore process it on behalf of the Data Controller as Data Processors:

- IT consultants (or consulting companies) for the provision of services relating to the assistance and maintenance of software and hardware
- External consultants and collaborators
- E-mail providers
- PEC Providers

Lawyers who provide services for the purposes indicated above may also be recipients of the data.

To find out at any time who your data will be communicated to, simply request an updated list by writing to the Data Controller at the addresses indicated above.

In addition, your data may be communicated to external parties such as, but not limited to, authorities and supervisory and control bodies, and in general, public or private bodies, entitled to request the data (e.g. Revenue Agency, Guardia di Finanza).

AUTHORIZED PERSONS

The personal data collected will also be processed by internal authorized persons who act on the basis of specific instructions provided regarding the purposes and methods of such processing.

DATA SUBJECT RIGHTS

COMPLAINT TO THE SUPERVISORY AUTHORITY

In relation to the data subject to the processing referred to in this document, you have the right to:

- At any time, ask the data controller to access your personal data and related information (art. 15 of the GDPR); to rectify inaccurate data or to integrate incomplete data (art. 16 of the GDPR); to erase your personal data (when one of the conditions set out in art. 17, paragraph 1 of the GDPR occurs and in compliance with the exceptions set out in paragraph 3 of the same article); to restrict the processing of your personal data (when one of the hypotheses set out in art. 18, paragraph 1 of the GDPR occurs);
- At any time, to request and obtain from the data controller in cases where the legal basis for processing
 is the contract or consent, and the same is carried out by automated means your personal data in a
 structured and machine-readable format, also for the purpose of communicating such data to another
 data controller (so-called right to data portability, art. 20 of the GDPR);
- At any time, to object to the processing of your personal data in the event of special situations concerning you (art. 21 of the GDPR).

The specific request is submitted by contacting the Data Controller by PEC to the address <u>info@pec.cecconsulting.it</u>, email to the address <u>privacy@cec.com</u> or registered letter with return receipt to the address Viale Einaudi n. 10 - Bari (BA), or the Data Protection Officer at the address <u>dpo@cec.com</u>.

If you believe that the processing of your data is in violation of the provisions of the Regulation, you can lodge a complaint with a supervisory authority (Italian Data Protection Authority – <u>www.garanteprivacy.it</u>) as provided for in art. 77 of the GDPR, or to take legal action (art. 79 of the GDPR).