



Privacy Notice under General Data Protection Regulation (GDPR) EU 2016/679

We would like to inform you (hereinafter referred to as Data Subject) that personal data collected by Studio Fieschi & soci S.r.l. (hereinafter referred to as "Studio Fieschi" or "Data controller"), following your contact with our company through the website www.studiofieschi.it or by e-mail, shall be processed in accordance with the General Data Protection Regulation EU 2016/679 (hereinafter referred to as "GDPR"), as follows:

1. The Data Controller

Studio Fieschi & soci S.r.l. VAT number 10846600012, registered address: C.so Vittorio Emanuele II n. 18 Torino (TO) 10123,

Contact details:

- telephone: 011.659.96.77
- e-mail: info@studiofieschi.it
- certified electronic mail (pec): studiofieschi@pec.it

2. Categories of recipients

Processing of data may be carried out under instruction of the Data Controller by external service providers involved in and/or necessary to providing the requested service such as, data processors, accountants, IT operators and legal consultants.

The Data Controller shall use only processors providing sufficient guarantees to implement appropriate measures in such a manner that processing will meet the GDPR requirements.

Furthermore, the Data Controller shall ensure that processors implement appropriate technical and organisational measures which guarantee that data is processed with identical security standards as those implemented by the Data Controller itself.

3. Types of data collected

Personal details including, but not limited to, name, surname, national insurance number, e-mail address, home address, contact details may be collected and stored electronically or manually.



Per le attività di progettazione, sviluppo ed erogazione di servizi di consulenza tecnica, gestionale, legislativa e strategica in materia di sostenibilità, dell'ambiente, del sociale e dell'energia.

4. Use of collected data

The Data is collected to allow the Data Controller to provide technical, managerial, legal and strategic services in the environmental field.

Data shall be processed lawfully, fairly and in a transparent manner for the following purposes:

1. Execution of contract;
2. Invoicing of service(s) provided;
3. Accountancy procedures and record keeping required by law;
4. Communication to Data subject;
5. Fulfilment of legal requirements;
6. Sending of advertising and/or other literature.

5. Lawful basis for data processing

The processing carried out by Studio Fieschi is legitimate as data is provided voluntarily by the Data Subject following contact with our company through the website www.studiofieschi.it , by e-mail or other forms of messaging service.

The subsequent processing of personal data provided voluntarily by the Data Subject is legitimate and/or necessary for the correct execution of the contract. Communication of advertising and/or other literature, shall be in accordance with specific consent given.

6. The obligatory and voluntary nature of providing data

Certain data are necessary in order to reply to the contact request and/or for the provision of the service/agreement and obligatory for the fulfilment of direct and indirect legal/contractual/fiscal requirements.

Therefore, refusal to provide these data, or subsequent refusal (see points 10-13), shall result in the inability of the Data Controller to execute the contract.

7. Disclosure and transfer of Data

Data may be disclosed to third parties only where necessary for the execution of the service or if required by law.

These may include:

- a) External service providers (see point 2, above) and authorised Data Controller employees and consultants;
- b) Public sector operatives and other third parties required under legal/regulatory rules;



c) Third parties necessary for the correct execution of the service in accordance with this privacy policy.
Data shall not be disclosed in any other manner without express consent of the Data Subject.

8. International Data transfer

Data may be transferred outside the European Union as a result of the use of software and/or data storage methods.

The Data Controller shall select a provider(s) able to guarantee appropriate security and technical measures to protect data and demonstrate compliance through Binding Corporate Rules (BCR)

The Data Controller shall ensure that all requirements are regularly controlled/reviewed.

9. Storage limitation

Manual and electronic data shall be stored for a maximum period of 10 years for administrative and fiscal purposes. Contact data voluntarily provided will be conserved for six months unless otherwise authorized.

At the end of this period, electronic data shall be deleted through "wiping" or "shredding" or anonymised and stored for statistical analysis. Manual records shall be destroyed/disposed of after they have been rendered unintelligible.

The Data Subject may request the return of any documentation provided to the Data Controller.

10. Rights of Data Subject

The Data Subject shall have the right to:

- a. obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, even if not yet registered, and provision of a copy of such data in an intelligible form;
- b. access to data;
- c. rectification (**art. 16**), updating, integration, erasure (**art. 17**) or restrict processing (**art. 18**);
- d. data portability i.e. receive data in a structured, commonly used and machine-readable format (**art. 20**);
- e. object to processing (**art. 21**) (see point 13);
- f. request a copy of processing data; where further copies are requested by Subject, an administrative charge may be made by Data Controller;



- g. withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;
- h. file a complaint with a supervisory authority;
- i. be informed as to the existence of an automated decision-making process, including profiling.

11. Modalities for the exercise of the rights of the Data Subject

Data subject rights may be exercised **at any time** by sending a request by means of a registered letter or e-mail/certified e-mail (see point 1).

12. Processing of personal data

Studio Fieschi adopts a policy of "data minimisation" in which data collection is limited to what is adequate and relevant for the execution of the Service/Contract or in relation to explicit consent.

Where reasonably possible, data shall be encrypted and pseudonymised in order to prevent unauthorized access and protect identity of Subject.

In reference to processing methods it should be noted that:

- a. Data shall be processed both manually and electronically using internal software or through "aaS" modality for word processing, automatic calculation, e-mail, file storage and specific software related to technical/management/legal/strategic consultancy in the field of environment;
- b. documents and copies of correspondence shall be stored securely and measures shall be taken to prevent access by unauthorised personnel;
- c. Accounting records are stored at our registered/operative address or at the offices of authorized accountancy providers which are required to ensure prevention of access by unauthorised personnel;
- d. Studio Fieschi utilizes an internal IT system consisting of the latest equipment which is regularly updated in accordance with soft/hardware provider requirements to reduce risk of security breaches. Devices are cable and wireless connected, however, specific configuration ensures identical levels of security. Data is centrally hosted;
- e. personal data files stored centrally are visible only to authorised personnel;
- f. devices used by authorised personnel are protected with antivirus programmes which are regularly updated to avoid risk of cyber-attacks;
- g. The network is equipped with a firewall to reduce risk of third party intrusion;



- h. Data is stored on an external memory which utilises a redundancy protocol configured to provide daily backup and allow fast restoration of data in the event of a system breakdown;
- i. Efficiency of The Studio Fieschi IT system is routinely checked and tested by internal/external specialized personnel.

13. RIGHT TO OBJECT

- a. The Data Subject shall have the right to object, **at any time** to the legitimate processing of personal data by the Data Controller concerning him or her, including profiling.
- b. The Data Subject also has, in any case the right to object at any time to the processing of personal data concerning him or her for direct marketing purposes which includes profiling to the extent that it is related to such direct marketing.
- c. The right to object may be exercised in writing using addresses listed in point 1.
- d. In accordance with point 6 of this notice, objection to data processing may result in an inability to execute a contract between the two parties.

The Data Controller
Studio Fieschi & soci S.r.l.

