

INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA

(As per articles 13 - 14 of EU Regulation 2016/679 and Italian Legislative Decree 196/2003 in light of Italian Legislative Decree 101/2018)

To whom it may concern,

We provide certain information below which needs to be brought to your attention, not only in order to comply with our legal obligations, but also because transparency and correctness towards our customers is a fundamental part of our business.

The Controller, in terms of processing personal data, is the PALLADIO GROUP, identified as a "group of undertakings" as established by article 4.19 of EU Regulation 679/2016 and which is liable towards you with regard to the correct use of your personal data and who you may contact for any information or request at the following addresses:

Controller: PALLADIO GROUP IN THE PERSON OF THE PARENT COMPANY, PALLADIO GROUP SPA

Headquarters: Via Cresole no. 8, 36031 Dueville (VI), ITALY

Contact details:

Telephone	0444 947111
Email	info@palladiogroup.com
Website	www.palladiogroup.com

Data Protection Officer (DPO):

dpo@palladiogroup.com

Your personal data is collected and processed for the purposes given below, together with the legal basis of reference:

Processing: Accounting

Purposes	Data processed	Legal basis	Duration
Tax compliance	Tax Code and other personal identification numbers; Name, address, or other elements of personal identification; Economic, sales, financial, insurance activities	Legal obligation	10 years from the accounting year

Categories of recipients: Your data may be communicated to consultants and/or freelance professionals in both singular and associated form

Processing: Customer Management

Purposes	Data processed	Legal basis	Duration
Customer management	Tax Code and other personal identification numbers; Name, address, or other elements of personal identification; Contact details (telephone number, email address, etc.)	Contract	10 years from the year in which the last contract is terminated

Recipients: Your data may be communicated to consultants and freelance professionals in both singular and associated form; Banks and credit institutions; Companies and other firms;

Processing: Marketing

Purposes	Data processed	Legal basis	Duration
Marketing (market analysis and surveys)	Tax Code and other personal identification numbers; Name, address, or other elements of personal identification; Economic, sales, financial, insurance activities; Contact details (telephone number, email address, etc.)	Consent	Until consent is revoked. Data will be stored for 10 years from the year in which consent is revoked
Sending informational material and/or advertisements, including by telephone or the internet	Tax Code and other personal identification numbers; Name, address, or other elements of personal identification; Economic, sales, financial, insurance activities; Contact details (telephone number, email address, etc.)	Consent	Until consent is revoked. Data will be stored for 10 years from the year in which consent is revoked

Recipients: Your data may be communicated to social security and welfare bodies, banking institutions, freelance professions, including in associated form, companies, and other firms. Communicating such data to some of these parties will only be done if there is a contractual and/or legal obligation.

Processing: taking photographs, shooting videos

Purposes	Data processed	Legal basis	Duration
Recording attendees, by means of taking photographs or shooting video, at courses or events organised by the Controller	Photographs, videos, and other multimedia content	consent	10 years from the year in which the event or course is held

Recipients: Your data may be published on the internet, on the PALLADIO GROUP's corporate website, on the PALLADIO GROUP's social media platforms, or on video platforms (e.g. youtube).

* Duration: In addition to the time needed to fulfil the prescribed terms in relation to each party's rights

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CHANGES TO THIS PRIVACY POLICY

The Controller reserves the right to make changes to this privacy policy at any moment and data subjects will be notified. In the event that a data subject does not accept the changes made to this privacy policy, he/she may ask the Controller to delete his/her Personal Data. Unless specified otherwise.

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Transferring data outside the EU

Personal Information can be transferred to recipients in USA, those recipients adopt the appropriate safeguards including standard data protection clauses provided for in the article 46 of Reg. UE 679/2016.

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In addition to this information, in order to ensure that your data is processed in the most correct, most transparent way possible, you should be aware that:

- except for consent-based purposes, supplying your data is a necessary requirement, otherwise providing the goods or service requested will not be possible
- you have the right to ask the Controller for access to your personal data and to have this data rectified or erased. You also have the right to restrict processing of the data that concerns you and to object to your data being processed
- if you have provided your consent for one or more specific purposes, you have the right to revoke such consent at any time
- you have the right to lodge a complaint with a Supervisory Authority. In Italy, this is: the Italian Data Protection Authority [Garante per la protezione dei dati personali]
- data will be processed with automated, semi-automated and manual means

Where provided for by this document, you have a legal obligation to provide your data, otherwise you may be subject to sanctions as per the law.

Dueville, 19/09/2019

Controller's signature
PALLADIO GROUP