

PRIVACY NOTICE

Dear Madame/Sir,

De Simone & Partners provides you the information below on the personal data processing that concern you and that the company will acquire.

“Personal data” is any information that relates to your person and, therefore, concerns you.

1. Why should the notice be read?

De Simone & Partners will use information relating to you and you have the right to be informed about which this information is, the purposes of its use, to whom it can be transferred etc. After being informed on the consequences of your dissent, you will be the one choosing, by a freely given indication of your will, whether or not to authorize the company to process your personal data by signing the related contract for professional services or by giving your consent to the processing .

2. Who is the Controller of your personal data?

De Simone & Partners spa is the data controller. The company’s registered office is in Via Vincenzo Bellini, 20 00198 Rome - Italy, Tel. +39 06 853361, Fax: +39 06 85831764, fiscal code/VAT registration number 07137171000.

In some cases, De Simone & Partners decides the purposes and modalities of your data processing together with other people, companies or entities which will acquire your data and will become joint controllers of them. If that occurs, you will find all the information in the Annex to this notice.

3. Who is the Data Processor?

To perform its obligations vis-à-vis you, De Simone avails itself of the collaboration of third parties who are appointed as Data Processor. You can consult the list of the Data Processors and find their e-mail contacts upon request at info@desimonepartners.com

4. How are your data processed?

Your data are subject to different operations which are necessary to pursue the purposes described below. All the operations are carried out by specifically appointed personnel through IT devices and by dealing with paperwork.

5. For which purposes is the information used?

Your personal data will be used for the following purposes:

- a) providing the service you have requested and for purposes connected to it;
- b) improving the organization of De Simone & Partners and the services it provides;
- c) fulfilling legal obligations and protecting legitimate interests of De Simone & Partners.

6. What does allow De Simone & Partners to use your personal data?

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De Simone & Partners processes your data to perform the services contract stipulated with you or by you with other joint controllers or because you gave consent to it by signing this form. Other processing is carried out by De Simone & Partners to fulfill legal obligations or to protect its legitimate interests.

7. What happens if you negate consent to processing your personal data? (if the legal basis of the processing is consent)

If the processing of your data is based on your consent, failing to furnish data entails the impossibility to provide the requested service.

8. Can the consent to data processing be withdrawn?

If your data processing is based on your consent, it can be withdrawn, but this fact shall not jeopardize the previous processing of data and it shall not prevent further processing which is mandated by the law or processing which is necessary to protect a legitimate interest of De Simone & Partners. If the legal basis of your data processing is a contract for professional services stipulated with you, the dissolution or termination of the contract shall have the same effects of the withdrawal of your consent.

9. To whom can your information be disclosed?

Your data will be disclosed to:

- our employees, employees, in the context of their duties;
- all those natural and / or legal persons, public and / or private when the communication is necessary or functional to the performance of our activity and in the ways and for the purposes described above.

Furthermore, your data may be communicated, for the purposes indicated, to:

- a) anyone who is a legitimate recipient of communications provided for by laws or regulations (such as, for example: offices and public authorities);
- b) Data processors appointed by De Simone & Partners S.p.A. and managing services that involve the treatments described above;
- c) Tax Agencies and any other public body to which De Simone & Partners S.p.A. is obliged to communicate its Personal Data;
- d) anyone who is a recipient of communications necessary to fulfill the obligations deriving from existing contracts;
- e) administrative services management company of which De Simone & Partners S.p.A. uses to fulfill its legal or contractual obligations (such as: accountants and labor consultants);
- f) other companies that collaborate with De Simone & Partners S.p.A. in the preparation of the Services covered by the Contract;

We inform you that the communications referred to in point a) involve the publication and the possible disclosure of your data.

10. Transfer of personal data abroad

If you requested De Simone & Partners to provide services outside the European Union or if you requested services impacting many Countries or all the world, we must inform you that your data could be transferred

DE SIMONE & PARTNERS SPA

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in Countries which do not have an adequate level of data protection and, therefore, they could be stolen, lost, destroyed and used illegally, causing a breach of your privacy right.

Furthermore, we inform you that if De Simone & Partners transfer your data in the above-mentioned Countries, it will consult associates who have signed safeguard clauses. The associates of De Simone & Partners are obliged to respect the professional secrecy; it reduces the risk for your data confidentiality.

De Simone & Partners needs your consent to transfer data in these Countries, without it the requested services cannot be provided in these Countries.

11. What is the duration of the processing of your personal data? Which are the criteria used to determine it?

The processing of your personal data will last no longer than the assignment for which your data is collected or subsequently processed. The duration of storage of your data meets the terms of the following point.

12. For how long is your information retained?

From the end of the service and the processing the acquired information will be retained by De Simone & Partners for twenty years. If you request us to provide further services, this period will be extended for additional twenty years from the end of such further activities of processing.

13. Does De Simone & Partners use automated individual decision-making, including profiling?

Neither automated individual decision-making nor profiling are used by De Simone & Partners.

14. Which are the security measures implemented by De Simone & Partners to protect your data?

De Simone & Partners protects your personal data through:

- a) a policy concerning the management of paper documents which allows a limited and registered access and protects them from distribution, loss and destruction;
- b) policies concerning the use of IT devices;
- c) the compliance of its IT tools with well-known security international standards.

The technical and organizational measures implemented by De Simone & Partners on data processing are available on the website <http://www.desimonepartners.com/index.php/it/> in the Document section (it is an optional choice)

15. Which are the rights you can exercise?

In relation to your data, multiple rights are recognized.

Your rights are:

Right to withdraw the consent:

You have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Right of access:

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You have the right to obtain confirmation as to whether or not your personal data are being processed, and, where that is the case, to obtain the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the period for which the personal data will be stored by De Simone & Partners;
- if your data have not been provided by you personally, you have the right to know from which source your personal data originate, and whether they came from publicly accessible sources.

Right to cancellation:

You have the right to obtain from us the cancellation of your personal data if:

- the personal data are no longer necessary;
- you withdrew the consent previously given or refuse a particular processing;
- De Simone & Partners has a legal obligation to cancel your personal data.

Right to rectification and integration:

You have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to personal data portability:

You have the right to receive your personal data in a structured, commonly used and machine-readable format. You have the right to transmit those data to another controller and to ask De Simone & Partners the direct transmission from one controller to another. In the latter case, your right is subject to a technical feasibility assessment made by the company.

Right to object to processing personal data:

You have the right to object, on legitimate grounds relating to your particular situation, to processing of your personal data at any time. Nevertheless, when the processing is necessary to carry out a public interest task, to fulfill a legal obligation or when it is necessary to pursue the legitimate interest of De Simone & Partners, the company will assess your request to verify to which extent it can be fulfilled.

Right to restriction of processing ^[17]_[SEP]

You have the right to obtain from De Simone & Partners restriction of processing where one of the following applies:

- a) you contest the accuracy of the personal data and you want to verify their accuracy;
- b) when you believe that your consent has not been validly given and, in lieu of asking De Simone & Partners to cancel your data you prefer to indicate the limits within which they can be used;
- c) when you want to prevent their erasure to exercise a right judicially;

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d) when you have objected to processing, pending the verification as to whether the De Simone & Partners has prevailing legitimate grounds in order to continue the processing.

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Right to lodge a complaint with the supervisory authority:

You can lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) for the infringement of the personal data protection and for requesting a verification by the Authority. The complaint can be underwritten by you directly or by the organizations representing you. In the latter case, a written power of attorney is required. The power of attorney must be filed with the Italian Data Protection Authority together with all the documentation useful for the assessment of the complaint. You can file the complaint in a way of your choice, by hand-delivering it to the Authority (at the address below) or by sending:

a) registered letter with return receipt addressed to the Italian Data Protection Authority (Garante per la protezione dei dati personali), Piazza di Monte Citorio, 121 00186 Rome;

b) e-mail: garante@gpdp.it, or protocollo@pec.gpdp.it;

c) fax: 06/69677.3785.

Before lodging the complaint, it is necessary to pay administrative charges for the amount of EUR 150, except for special cases worthy of evaluation, which would justify exemption from payment, due to the economic conditions or financial hardship of the applicant, the nature of the performed activity or the purposes of the processing.

(if the legal basis of the processing is the consent)

I, the undersigned, (name and surname) _____

born in _____ on ____ / ____ / ____

social security number _____

resident in (City, Province, Nation) _____

at (address) _____

GIVE MY CONSENT TO THE PROCESSING OF PERSONAL DATA

Yes No

GIVE MY CONSENT TO TRANSFER DATA ALSO IN COUNTRIES REFERRED TO UNDER POINT

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Yes No

By signing this consent form, I declare to have received and understood the notice and to have freely given the consent to data processing.

Rome, _____

Signature _____

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