

INFORMATION SHEET ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF THE EU REGULATION 679/2016 - GDPR

Forma e Funzione S.r.l., Tax Code and VAT no. 00425830122, with registered office in Varese, Via Pacinotti 64 (hereinafter also only "the Company"), as Data Controller for the processing of personal data pursuant to **EU Regulation 679/2016 - General Regulation on Data Protection** (hereinafter only "GDPR"), acknowledges the importance of the protection of personal data, considering same as one of the main objectives of its activity.

We hereby provide the necessary information regarding the processing of personal data pursuant to Article 13, GDPR. Therefore, before providing any personal data, Forma e Funzione S.r.l. invites you to read this information sheet carefully as it contains important information on the protection of personal data and on security measures taken to ensure confidentiality, in full compliance with the current legislation.

Forma e Funzione S.r.l. informs you that the processing of your personal data will be carried out using manual, computerized and/or telematic tools and will be based on the principles of lawfulness, correctness, transparency, purpose limitation and retention, data minimization, accuracy, integrity and confidentiality, protecting the rights and freedom of the data subject. Your personal data will therefore be treated with logics strictly related to the purposes indicated below, in accordance with the provisions of the GDPR and, in any case, in order to guarantee the security and confidentiality of the data.

Premise

"GDPR" means the EU Regulation 679/2016 of the European Parliament and of the Council of 27/04/2016, applicable as from 25/05/2018, concerning the protection of natural persons with regard to the processing of personal data.

"Personal data" means any information concerning an identified or identifiable natural person with particular reference to an identifier such as a name, an identification number, location data, an online identifier or one or more characteristic elements of his/her physical, physiological, psychic, economic, cultural or social identity.

"Particular data" means personal data pursuant to Article 9 of the GDPR.

"Judicial data" means personal data relating to criminal convictions and crimes or related security measures.

"Processing" means any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or set of personal data, such as collection, registration, organization, structuring, retention, adaptation or modification, extraction, consultation, use, communication through transmission, diffusion or any other form of making it available, comparison or interconnection, limitation, cancellation or destruction.

1. Subject of processing

The Data Controller processes your personal data (as an example, but not limited to): name, surname, company name, VAT number, tax code, landline or mobile number, fax number, e-mail address, bank account details, etc.), communicated, by way of example but not limited to, verbally, by means of a business card, e-mail, delivery of documents, through the website of the Data Controller etc., in accordance with the GDPR, assuming that they refer to you, your company or third parties, who have expressly authorized you to confer them on the basis of an appropriate legal basis that legitimizes the processing of the data in question. With respect to these hypotheses, you are the independent Data Controller, assuming all legal obligations and responsibilities. In this sense, you confer on the point the widest indemnity with respect to any objection, claim, request for compensation for damage from processing that should be addressed to FORMA E FUNZIONE S.R.L. by third parties whose personal data have been processed on your request and/or in execution of the contract or service requested.

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2. Purpose and legal basis of processing, mandatory or optional nature of the conferment, consequences of refusal, consent

Your personal data will be processed:

I. without your express consent (Article 6, letters b, c, f, GDPR), for the following purposes:

a. to fulfil the pre-contractual and contractual obligations deriving from the sale, as well as to satisfy any other request made by you;

b. administrative and management purposes and for the fulfilment of obligations provided by law (such as, for example, those of an accounting and fiscal nature), by a regulation, by the community legislation or by an order of the Authority, to which the Data Controller is subject;

c. purposes necessary to ascertain, exercise or defend a right in Court or whenever the jurisdictional authorities exercise their jurisdictional duties;

II. with your consent (Article 7, GDPR), for the following purposes:

d. sending newsletters containing informative and publicity material, articles and publications, also in relation to the activity of the Data Controller;

e. commercial, promotional and marketing purposes for sending technical, commercial and promotional material of products and services offered by this Company.

The legal basis of the processing of personal data for the purposes referred to in Section I), point a), is the execution of a contract of which you are a party or the execution of pre-contractual measures adopted upon your request, therefore the execution of pre-contractual and contractual obligations with respect to legal relationships constituted with you and/or to be constituted.

The legal basis of the processing of personal data for the purposes referred to in point b) is the fulfilment of a legal obligation to which the Data Controller is subject, while for the purposes referred to in point c) it is the pursuit of the legitimate interest of the Data Controller. Please note that, taking into account the purposes of the processing as explained above, the provision of your personal data for the purposes referred to in Section I) is mandatory. Your eventual failure, partial or inexact provision and/or eventual refusal to the processing will make it impossible for the Data Controller to follow up your requests, to fulfil the contractual obligations deriving from the mandate conferred or a legal obligation to which the Data Controller is subject, or the requests from the competent Authorities.

The provision of data for the purposes referred to in the previous section II) point d. and e. is optional, with the consequence that you may decide not to give your consent, or to revoke it at any time; in this case, without your consent, the Data Controller will not be able to carry out the above-mentioned points.

3. Processing methods and retention times

The collection and processing of your personal data by the Data Controller are performed in compliance with the principles of lawfulness, fairness and transparency and in order to ensure an adequate security, including protection, through appropriate technical and organizational measures, from unauthorized or illegal processing and from accidental loss, destruction or damage.

The envisaged processing will be carried out in the following ways: use of paper, computerized and telematic supports, also according to the technological evolution. The IT system of Forma e Funzione is in a protected network. The collaborators of the company Forma e Funzione, whether they are employees rather than freelancers, called to carry out the activities connected with the performance of the services requested, have been formally appointed and have

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received an adequate training; the above people in charge will carry out the processing of the data of which they will come aware in compliance with the provisions of the law in force, guaranteeing confidentiality and security of the data. Their names will be communicated, if requested, promptly and contextually with the evolution of the activity itself.

The collected paper documents are kept in closed, guarded and monitored archives where access is forbidden to those who have not been appointed. The premises of the Forma e Funzione company are monitored and subject to surveillance with anti-intrusion systems. The data collected will be processed for the time strictly necessary to achieve the purposes for which they were collected, without prejudice to the need to keep the data in order to meet the obligations established by current legislation even after the cessation of processing operations (see, for example, ten-year retention for accounting-tax documentation, such as delivery notes, invoices, etc.) or up to the time allowed by law and/or to protect the interests of the Data Controller.

Further information regarding the retention period of personal data and the criteria used to determine this period may be requested by writing to the Data Controller.

4. Categories of recipients of personal data and data communication

Without prejudice to communications carried out in compliance with legal and contractual obligations, all your data collected and processed may be shared, exclusively for the purposes specified above, with the following categories of recipients:

- employees and collaborators of the Data Controller, in their capacity as subjects authorized to process personal data, who have committed themselves to confidentiality or have an appropriate legal obligation of confidentiality;
- people, companies, professional firms or other third parties with whom the Data Controller maintains relations necessary to carry out his activity, for the purposes indicated above or for a legal obligation, who have been assigned with a specific mandate and for the time necessary to achieve the purposes for which data has been collected, who typically act as Data Processors of FORMA E FUNZIONE SRL;
- Jurisdictional or supervisory authorities, administrations, public bodies and organizations, when exercising their functions.

The Data Controller ensures that the processing of your personal data by the aforementioned recipients is carried out in compliance with the current legislation.

Without the need for express consent (Article 6, letters b, c, f, GDPR), the Data Controller may communicate your data for the purposes listed above to Supervisory Bodies, Judicial Authorities, insurance companies for the provision of insurance services, banks and credit institutions, consultants and professionals, third parties in general, including platforms that offer archiving and data exchange services specifically indicated by you, etc., as well as to those subjects to whom communication is a legal or contractual obligation or represents the fulfilment of your specific request, with the clarification that these subjects will process the data in their capacity of independent Data Controllers.

The updated list of those responsible and/or joint Data Controllers (e.g. professionals, associated offices, etc.) to whom your data can be communicated, always to carry out the requested service in the best possible manner, is kept in the archives of the Forma e Funzione Srl company.

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The data will not be communicated to other subjects or sent to third parties residing in countries outside the EC without your prior consent and neither will it be disseminated.

5. Retention and transfer of data

Your personal data is stored on servers located at the premises of the Data Controller, within the European Union. In any case, it is understood that the Data Controller, if necessary, will have the right to move the servers even outside the EU. In this case, the Data Controller ensures as from now that the transfer of data in non-EU countries will take place in accordance with the applicable legal provisions.

6. Rights of the data subject

In accordance with the provisions of the GDPR, you may exercise the following rights:

- a. right of access - obtain confirmation whether a personal data processing concerning you is in progress and, if so, to receive information concerning, in particular, the purposes of the processing, categories of personal data processed and retention period, recipients to whom they may be communicated (Article 15, GDPR);
- b. right of correction - obtain, without undue delay, the correction of inaccurate personal data concerning you and the integration of incomplete personal data (Article 16, GDPR);
- c. right of cancellation - obtain, without undue delay, the cancellation of personal data concerning you, in the cases provided for by the GDPR (Article 17, GDPR);
- d. right of limitation - obtain from the Data Controller the limitation of processing, in the cases provided for by the GDPR (Article 18, GDPR);
- e. right to portability - receive in a structured format, commonly used and readable by an automatic device, the personal data concerning you provided to the Data Controller, as well as obtain that the same are transmitted to another Data Controller without impediments, in the cases provided by the GDPR (Article 20, GDPR);
- f. right of opposition - oppose the processing of personal data concerning you, unless there are legitimate reasons for the Data Controller to continue processing (Article 21, GDPR);

With reference to the aforementioned purposes, the data subject has the right to proceed, at any time, with the revocation of the consent for the processing of his/her data by writing to Forma e Funzione S.r.l. - Varese, Via Pacinotti 64 or by sending an email to: privacy@formaefunzione.com. Pursuant to Article 7 of the EU Regulation, the withdrawal of consent does not imply any prejudice on the lawfulness of the processing based on the consent given prior to the revocation.

Right to lodge a complaint The data subject has the right to lodge a complaint with the Personal Data Protection Authority according to the procedures indicated by the same authority on the internet address www.garanteprivacy.it/web/guest/home/docweb/-/docuweb_-display_/docweb_/4535524, or by writing to the Personal Data Protection Authority for the protection of personal data, located in Piazza di Montecitorio no. 121, 00186, Rome (RM), should their rights be compromised.

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7. How to exercise rights

You can exercise your rights at any time by sending:

- a registered letter to: FORMA E FUNZIONE S.R.L., Via Pacinotti 64. - Varese
- an e-mail to the email address: privacy@formaefunzione.com

8. Data Controller

Under the GDPR, the Data Controller is FORMA E FUNZIONE S.R.L. as defined above. For any information concerning the processing of personal data of FORMA E FUNZIONE S.R.L., including the list of Data Processors, please send an e-mail to: privacy@formaefunzione.com

9. Modifications

FORMA E FUNZIONE S.R.L. reserves the right to modify or simply update the contents of this information sheet, partly or completely, also due to changes in the current legislation and therefore invites you to regularly visit the specific section of your website in order to be become acquainted with the latest version of same.

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