

W EXECUTIVE S.R.L.

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PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA OF COMPANIES ARTICLES 13 and 14 OF REGULATION (EU) 2016/679 ("GDPR")

1. CONTACT DETAILS OF THE DATA CONTROLLER AND OF THE DATA PROTECTION OFFICER

DATA CONTROLLER (the "Company" or the "Controller")	W EXECUTIVE S.R.L. Registered office: Corso Venezia 48, 20121 Milano VAT No.: 04310290988 Tax Code: 04310290988 privacy@wexecutive.eu info@pec.w-executive.it
DATA PROTECTION OFFICER (DPO)	EUCS S.r.l.s. Unipersonale VAT No.: 04709650289 Telephone: 049-8764539 e- mail: info@eucs.it Certified e-mail: info@pec.eucs.it

2. CATEGORIES OF DATA BEING PROCESSED AND DATA SOURCES

- 2.1 Whereas this privacy notice is also to be understood as being given to natural persons who enter into a contractual relationship in the name and on behalf of the legal person, as well as to employees/contractors who manage the contractual relationship in the name and on behalf of the legal person. Therefore, the data being processed are identification data, including, but not limited to, first name, surname, place and date of birth, tax code, company data, landline and mobile telephone contacts and e-mail address.
- 2.2 Data are collected from data subjects by post, fax, e-mail, by hand at your premises or by registration of an Application Form in our database, as well as through online verifications of publicly available data carried out independently by the Data Controller. The types of data being processed are common data.

3. PURPOSES AND LEGAL BASIS OF THE PROCESSING AND DATA STORAGE PERIOD

WHY DO WE PROCESS YOUR DATA?	WHAT ARE THE CONDITIONS FOR LAWFUL PROCESSING?	HOW LONG DO WE KEEP YOUR PERSONAL DATA?
For purposes related or instrumental to the establishment, performance and termination of the contractual relationship.	Performance of steps prior to entering the contract or during the performance of the contract (point (b) of Art. 6(1) of the GDPR).	For the time needed for the purpose of processing and for the following 10 years (i.e. the term of the applicable statutes of limitation in our legal system), to which may be added the technical time necessary to proceed to the deletion of personal data, which, in any case, shall not exceed 12 months.
To ascertain, exercise or defend the Controller's rights in and/or out of court.	Legitimate interests of the Company to protect and defend its rights in the	For the entire duration of the dispute, until the time limits for bringing an appeal have expired.

	appropriate fora (point (f) of Art. 6(1) of the GDPR).	
For the fulfilment of obligations under the law applicable to the relationship with the Company.	For compliance with a legal obligation to which the Controller is subject (point (c) of Art. 6(1) of the GDPR).	For the duration of the contractual relationship with the Company and for the following 10 years (i.e. the term of the applicable statutes of limitation in our legal system), to which may be added the technical time necessary to proceed to the deletion of personal data, which, in any case, shall not exceed 12 months.
For the purposes of conducting business activities consisting, specifically, in telephone communications by our staff or in sending information and promotional material concerning our services and initiatives either through newsletters, telefax or e-mail, as well as in the performance of market research, direct sales of services and commercial communications.	Either the data subject has given consent or the relationship is with private databanks (point (a) of Art. 6(1) of the GDPR).	For 24 months since the last activity performed, unless the data subject objects to the processing or withdraws consent.
To allow you to receive other services, your data may be disclosed to Companies belonging to W Group Holding S.p.a. of which W Executive S.r.l. is part.	The data subject has given consent (point (a) of Art. 6(1) of the GDPR).	For the period of time for which the data are retained by the Company depending, from time to time, on the purposes of the processing concerned as indicated above. For the retention period relating to services provided by other group companies, please refer to the privacy policy of each group company, as provided from time to time.
After the above-mentioned retention periods have elapsed, all data will be deleted or rendered anonymous and paper media will be destroyed.		

4. MANDATORY PROVISION OF DATA AND MANNER OF PROCESSING

- 4.1 The provision of data is mandatory in order to fulfil the purposes set out in this privacy notice (except for personal data for which specific consent is required as set out under point 3) above. Refusal to provide the data will prevent the Company from conducting the above activity.
- 4.2 The processing of personal data is carried out by manual, paper-based, computer-based, telematic or automated means, also suitable for storing, managing or transmitting the data, in any case

suitable for guaranteeing the security and confidentiality of the data, according to criteria strictly related to the purposes set out in this privacy notice. The processing of personal data is performed lawfully, fairly and in a transparent manner, according to the inspiring principles of Regulation (EU) 2016/679.

5. CATEGORIES OF DATA RECIPIENTS

- 5.1 The data may be disclosed to entities acting as autonomous data controllers, including, but not limited to, the companies belonging to W Group Holding S.p.a., the Company's customers, public bodies, etc., subject to your prior explicit consent, or to fulfil the purposes referred to in this privacy notice.
- 5.2 Your personal data may be processed, on behalf of the Company, by other subjects appointed as Processors or in charge of processing activities, a list of which is available at the registered office of W Executive S.r.l.

6. LOCALISATION AND TRANSFER OF DATA

- 6.1 For personal data processing, W Executive S.r.l. makes use of an IT infrastructure located in the European Union.
- 6.2 In case of reliance on suppliers based outside the European Union, we will check in advance that they have consistent security measures in place and that they fulfil the guarantees provided for by the GDPR.

7. RIGHTS OF DATA SUBJECTS

- 7.1 You have the right to request to the Controller access to and rectification or erasure of personal data concerning yourself, the right to have incomplete personal data completed, the right to restriction of processing in the cases provided for by Article 18 of the GDPR ; the right to receive the data in a structured, commonly used and machine-readable format, as well as, if technically feasible, to transmit those data to another controller without hindrance if the conditions for exercising the right to portability pursuant to Article 20 of the GDPR are met (i.e., that the processing is based on consent pursuant to point (a) of Article 6.1 or point (a) of Article 9.2 of the GDPR or on a contract pursuant to point (b) of Article 6.1 of the GDPR and is carried out by automated means).
- 7.2 You have the right to object to processing on grounds relating to your particular situation, for the pursuit of purposes based on the legitimate interests of the Company, as well as when your personal data are processed for direct marketing purposes; you also have the right to object to any further processing of your data collected online, as indicated in paragraph 2.2 above.
- 7.3 You have the right to withdraw the consent you have given at any time, without affecting the lawfulness of the processing carried out up to that moment.
- 7.4 You may exercise the above rights by writing to privacy@wexecutive.eu or you may contact the DPO - EUCS S.r.l.s. Unipersonale at the contact details provided above.
- 7.5 Data subjects who consider that the processing of personal data relating to them conducted by the Controller infringes the provisions of the GDPR have the right to lodge a complaint with the Data Protection Supervisory Authority (Article 77 of the GDPR) or to take legal action (Article 77 of the GDPR).

DECLARATION OF ACKNOWLEDGEMENT OF THE PRIVACY NOTICE

I declare that I have received and read the privacy notice on the processing of my personal data.

Place: _____ Date: __/__/____

Legible name and surname: _____ Signature: _____

DECLARATION OF CONSENT FOR PURPOSES OF COMMERCIAL COMMUNICATIONS

I declare that I have read the information on the processing of personal data provided by W Executive S.r.l. and, being aware that my consent is optional and that I have the right to withdraw it at any time, as regards the processing of my personal data for marketing purposes as set out under point 3 above.

- I give my consent
- I refuse consent

DECLARATION OF CONSENT TO THE DISCLOSURE OF PERSONAL DATA TO COMPANIES BELONGING TO W-GROUP HOLDING S.P.A.

I declare that I have read the information on the processing of personal data provided by W Executive S.r.l. and, being aware that my consent is optional and that I have the right to withdraw it at any time, as regards the disclosure of my personal data to the companies belonging to W Group Holding S.r.l.

- I give my consent
- I refuse consent