

INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR MARKETING PURPOSES PURSUANT TO ARTICLES. 12,13 and 14 OF EUROPEAN REGULATION No. 679/2016

PREMISE

Considering that marketing is at the basis of any business activity where it is fundamental to establish a relationship of loyalty with acquired customers while also cultivating the possibility of making products and services known to potential new customers, RSM Società di Revisione e Organizzazione Contabile S.p.A. (hereinafter also referred to as the "Data Controller" or "RSM" or "Company") considers of paramount importance both the respect of the data subject and the correct use of his/her personal data. Inspired by these principles, it has chosen to carry out its marketing activities in a transparent manner, giving centrality to the indications of the Privacy Guarantor on this matter.

With EU Regulation 679/2016, as well as pursuant to Legislative Decree 101/2018, which amends Legislative Decree 196 of 2003 (Privacy Code) containing provisions for the protection of individuals with respect to the processing of personal data, [RSM Società di Revisione e Organizzazione Contabile S.p.A.](#) with registered office in Via Meravigli, 7, 20123 Milan, as Data Controller, informs that it is required to provide certain information regarding the use of personal data pursuant to Articles 12, 13 and 14 of the EU Regulation, and that it will proceed in compliance with the fundamental rights and freedoms of persons for the purposes and in the manner provided for by the same Regulation.

This information notice, therefore, indicates to the interested party who and how they will process their data, whether or not it is compulsory to provide them in order to supply information or products/services, who to contact to obtain clarification or to exercise their rights.

1. PURPOSE OF DATA PROCESSING

The data are processed as part of the Company's normal activity and for the following purposes

- a) direct marketing in order to carry out activities functional to the promotion of services of the Data Controller or of third party companies through the periodic sending of letters, mailing lists, newsletters, social networks and informative material containing commercial information relating to products/services already acquired or newly proposed, market surveys.
- b) sending notices containing information regarding activities organised by RSM such as, for example, surveys, webinars conferences, events and the management of the relative participation.

If the Data Controller intends to further process personal data for a purpose other than that for which they were collected, it shall provide the data subject with all necessary information in advance and shall request his/her consent where required.

2. CATEGORY OF DATA AND LEGAL BASIS FOR PROCESSING

The forwarding of communications regarding products or services of RSM Società di Revisione e Organizzazione Contabile S.p.A. is based on the consent freely and expressly given by the person concerned.

The personal data that the Data Controller processes include, by way of example, personal data (name and surname), personal contact data.

Consent is not compulsory for all other purposes and, when given, may be revoked at any time by the data subject.

It should be noted from the outset that if you are not actually interested in receiving these communications, you may stop receiving them at any time (see Article 8. RIGHTS OF THE INTERESTED PARTY - d) right to object to processing).

3. DATA RETENTION POLICY

Personal data will be kept for a period of time not exceeding the achievement of the purposes for which they are processed, and in any case for a period of time strictly necessary to fulfil the obligations imposed on the Data Controller by national and/or supranational laws, as well as by the laws of the countries to which the data may be transferred; the same data will be kept for a shorter period if you withdraw your specific consent.

We also inform you that no automated decision-making processes will be used in the processing of personal data.

4. PROCESSING METHODS

Personal data is processed by manual, computerised and telematic means with logic strictly related to the purposes and in any case in such a way as to guarantee the security and confidentiality of the data. Documentation is stored electronically. Below is some essential information:

- the collection of personal data is limited to the minimum necessary for each specific purpose of processing;
- The processing of personal data is limited to the purposes for which they were collected;

- storage of personal data is limited to the minimum necessary for each specific processing purpose;
- no personal data are provided to commercial third parties;
- personal data are not sold or rented out;

5. **CONFERMENT, COMMUNICATION AND DISSEMINATION OF DATA**

Without prejudice to communications carried out in fulfilment of legal obligations, the personal data collected by the Company may also be communicated, within the limits strictly pertinent to the aforementioned purposes, to the following subjects or categories of subjects:

- subjects, within the scope of their respective and specific competence, to Entities and, in general, to any public or private subject with respect to which there is an obligation (or a power recognised by law or secondary or EU regulations) or a need for communication;
- to entities that support the organisation of marketing and communication activities both from the point of view of structuring communications (e.g. graphics) and from the point of view of carrying out the activity, or other professionals/companies that collaborate with the Company for marketing purposes;
- consultants of the Company, in order to study and solve any legal problems.
- to third parties to whom disclosure is necessary for the fulfilment of obligations arising from contracts signed by you, and from legal requirements.

The data will not be disclosed to unspecified parties by means of making them available or consulting them.

For data collected not directly from the person concerned, this information is provided, also in electronic format, at the time of their registration and in any case no later than the first possible communication. In any case, all such data are processed in compliance with the aforementioned law and the confidentiality obligations that have always inspired the Company's activities.

6. **DATA COLLECTED VIA MAILUP PLATFORM**

For the sake of full information, we would like to point out that in sending the promotions, the Data Controller may make use of the MailUp e-mail marketing newsletter platform which, by means of statistical tracking systems (e.g. web beacons, pixels, etc.), makes it possible to detect the opening of a message, the clicks made on the hyperlinks contained within the e-mail, from which IP address or with which type of browser the e-mail is opened, and other similar details. The collection of this data is functional for the use of the platform and is an integral part of the functionality of the message delivery system..

7. TRANSFERS ABROAD

Personal Data may be transferred to countries within the European Union and to countries outside the European Union within the scope of the purposes set out in Article 1. In case of transfer of personal data outside the European Union, in the absence of an adequacy decision by the European Commission, the requirements of the applicable legislation on the transfer of Personal Data to non-EU countries will be complied with.

8. RIGHTS OF THE DATA SUBJECT

As a data subject, you may exercise your rights under the Regulation against the Controller at any time by sending an explicit request in writing to the e-mail address privacy@rsmrevisione.it.

The data subject may assert his or her rights, recognised by the binding legislation and in particular Articles 15 to 22 of the GDPR, such as:

- a. right of access: right to obtain from the Controller confirmation as to whether or not personal data are being processed and, if so, to obtain access to personal data and further information on the origin, purposes, categories of data processed, recipients of communication and/or transfer of data, etc.;
- b. right of rectification: the right to obtain from the Controller the rectification of inaccurate personal data without undue delay, as well as the integration of incomplete personal data, including by providing a supplementary declaration;
- c. right to erasure: the right to obtain from the Controller the erasure of personal data without undue delay in the event that:
 - personal data are no longer necessary in relation to the purposes of the processing;
 - the consent on which the processing is based has been withdrawn and there is no other legal basis for the processing;
 - personal data have been unlawfully processed;
 - personal data must be deleted to comply with a legal obligation.
- d. right to object to processing: the right to object at any time to the processing of personal data that have as their legal basis a legitimate interest of the Controller;
- e. right to restriction of processing: The right to obtain from the Controller the restriction of processing, in cases where the accuracy of personal data is contested (for the period necessary for the Controller to verify the accuracy of such personal data), if the processing is unlawful and the Data Subject has objected to the processing, if the personal data are necessary

to the Data Subject for the establishment, exercise or defence of legal claims, if following the objection to the processing the Data Subject is awaiting verification as to whether or not the legitimate interest of the Controller prevails;

- f. right to data portability: the right to receive personal data in a structured, commonly used and machine-readable format and to transmit such data to another data controller, only where the processing is based on consent or on a contract and only for data processed by electronic means;
- g. the right not to be subject to automated decisions: the right to obtain from the Controller not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects concerning the Data Subject or significantly affect him/her, unless such decisions are necessary for the conclusion or performance of a contract or are based on the consent given by the Data Subject;
- h. the right to lodge a complaint with a supervisory authority: without prejudice to any other administrative or judicial remedy, a Data Subject who considers that the processing concerning him or her violates the GDPR has the right to lodge a complaint with a supervisory authority.

9. OWNER, MANAGER AND APPOINTEES

We inform you that the Data Controller of the data provided is: **RSM Società di Revisione e Organizzazione Contabile S.p.A. with registered office in Via Meravigli, 7, 20123 Milan.** In order to exercise the rights provided for by the GDPR, the interested party may at any time exercise their rights by sending: privacy@rsmrevisione.it

Your personal data will be processed exclusively by personnel appointed by the Controller. You may request a complete and updated list of the persons appointed as data processors by contacting the Controller.