

## **INFORMATION ON PERSONAL DATA PROTECTION** **pursuant to Section 13, EU Regulation 2016/679**

In compliance with legal obligations set out in the EU General Data Protection Regulation 2016/679, you are kindly invited to carefully read information under Art. 13 of EU Regulation 2016/679.

### **1. Purposes of data processing**

Your personal data will be processed for purposes related to the fulfillment of the following obligations:

- Fiscal and accounting requirements
- Post-sales support
- Management of legal disputes
- Client management
- Quality management
- Fulfillment of market surveys and/or statistics, as well as promotional activities including mailing of advertising material, if applicable
- Business planning
- Customer satisfaction audit
- Invoice record management

The processing of data required to fulfill the above obligations is necessary for a proper management of our business relation and the provision of such data is mandatory to satisfy the purposes above. The Data Controller also informs you that, in case any of the mandatory information are not provided or are provided incorrectly, the Data Controller might be unable to guarantee the correct and adequate processing of your personal data.

### **2. Processing methods and storage period**

Your personal data will be processed in paper, electronic or telematic format and stored in relevant databases which can be accessed by persons appointed to data processing.

Your personal data could be communicated to third parties in order to fulfill fiscal and/or legal requirements.

Your personal data could also be processed by third parties who provide specific processing, administrative or instrumental services which are necessary to achieve the purposes outlined above.

Your personal data will be stored for a period of 10 years.

### **3. Nature of the personal data**

Your personal data will be processed for the purposes outlined at point 1 above. The collected personal data mainly refer to:

- Your ID and personal data
- Special categories of personal data, including data concerning health
- Financial data (i.e bank data).

### **4. Mandatory vs voluntary nature of data provision**

Data provision and data processing are mandatory and necessary to carry out our business activity.

This implies that in case you refuse to provide personal data necessary to these purposes it will be impossible for us to provide our professional services.

### **5. Communication and dissemination of the personal data**

With reference to purposes mentioned above, your personal data can be communicated to the following subjects:

- Public authorities in compliance with legal obligations
- National Welfare and Assistance Funds (such as Italian INPS, INAIL, supplementary pension funds)
- Service companies needed to implement our business
- Insurance companies
- Bilateral bodies and their coordinating boards, both on national and regional basis
- National and international Partners
- Social Partners
- Audit companies
- Layers and consultants
- Business associations (if the Company is associated)

- Healthcare organizations for special activities related to our services.

## **6. Identification details of Data Controller and Data Processor**

Under the law, the Data Controller is "Start Promotion Group" including Start Promotion srl and Start Promotion Eventi srl (Via Mauro Macchi 50, 20124 Milano (MI) Italy); email [privacy@startpromotion.it](mailto:privacy@startpromotion.it); ph. +39 02 67071383, in the person of its pro tempore legal representative.

## **7. Rights under articles 15, 16, 17 18, 20, 21 and 22 of EU General Data Protection Regulation 2016/679**

We inform you that, as Data Subject, you shall have the right to lodge a complaint with a supervisory authority. Moreover, you shall have the right to obtain from the Controller the erasure, communication, update, rectification and integration of your personal data.

### Art.15 - Right of access by the Data Subject

The Data Subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and information related to data processing.

### Art.16 - Right to rectification

The Data Subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the Data Subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### Art.17 - Right to erasure (right to be forgotten)

The Data Subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay and the Controller shall have the obligation to erase personal data without undue delay.

### Art.18 - Right to restriction of processing

The Data Subject shall have the right to obtain from the Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the Data Subject, for a period enabling the Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims;
- d) the Data Subject has objected to processing pursuant to Article 21(1), pending the verification whether the legitimate grounds of the Controller override those of the Data Subject.

### Art.20 - Right to data portability

The Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another Controller without hindrance from the Controller to which the personal data have been provided.

In exercising his or her right to data portability pursuant to paragraph 1, the Data Subject shall have the right to have the personal data transmitted directly from one Controller to another, where technically feasible.

### Art.21- Right to object

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions.

### Art.22 - Right not to be subject to automated individual decision-making, including profiling

The Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

## **8. Withdrawal of consent to personal data processing**

You shall have the right to withdraw your consent to personal data processing, by calling the phone number +39 02 67071383 or writing an email to [privacy@startpromotion.it](mailto:privacy@startpromotion.it).

At the end of this procedure, your personal data will be removed from the databases as soon as possible.

Before providing or modifying any information, we could need to verify your identity and you could be requested to answer some questions. You will receive a final response as soon as possible.

The Data Controller  
Dr. Riccardo Ottolini