

PRIVACY POLICY FOR THE PROCESSING OF PERSONAL DATA OF CLIENTS/PROSPECTS

(Art. 13 EU Reg. 679/2016)



Your personal data is processed in joint controllership by the following entities: lawyer Silvia Stefanelli, lawyer Andrea Stefanelli and Stefanelli&Stefanelli Servizi Legali s.r.l.s (hereinafter referred to as Studio legale Stefanelli&Stefanelli).

You may contact the Data Controller:

- by telephone at: (+39) 051.520315
- via email at: privacy@studiolegalestefanelli.it

1. FOR WHAT PURPOSES IS MY DATA PROCESSED AND WHY IS THE PROCESSING LAWFUL?

PURPOSES	LEGAL BASIS	OBLIGATION TO PROVIDE DATA
The correct and <u>complete execution of the professional assignment</u> received, both in and out of court.	The processing is lawful on the basis of the <u>mandate</u> given to the professionals or the <u>contract</u> concluded with them.	The provision of ordinary, sensitive and judicial personal data is necessary for the performance of the contract, and the refusal of the data subject to provide the personal data makes it impossible to perform the contract.
Carrying out <u>all general business activities</u> (e.g. bookkeeping and accounting management) related to the service requested.	Carrying out all <u>general business activities</u> (e.g., bookkeeping and accounting management) related to the requested service.	The provision of data is <u>mandatory</u> for the conclusion of the contract; therefore, the refusal to provide the data prevents the establishment of the contractual relationship and the fulfilment of the resulting obligations.
Sending communications regarding the activities and initiatives of the data controllers (such as commentaries and newsletters on regulatory updates, case law and courses) to individuals included within the scope of a professional assignment.	The data of individuals already processed within the scope of a professional assignment are processed based on the <u>data controllers' legitimate interest</u> .	The data subject whose data is processed on the basis of legitimate interest may object to the processing at any time by sending an e-mail to privacy@studiolegalestefanelli.it

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PURPOSES	LEGAL BASIS	OBLIGATION TO PROVIDE DATA
Sending communications relating to the activities of the data controllers (such as commentaries and newsletters on regulatory updates, case law and courses) to individuals whose data has been collected through personal contact with the data controllers or their collaborators.	Contact details will be processed on the basis of the <u>data subject's express consent</u> .	Consent to data processing is <u>voluntary</u> , but failure to provide the data will result in the inability to receive the information material. Consent may be withdrawn at any time.
User registration on the website	The processing of your data is lawful because it is necessary for the performance of the contract concluded between you and the data controller in relation to your request to register on the website.	You are free not to provide your data for this purpose, but if you do not provide it, you will not be able to register on the website.
User registration for webinars organised by the firm	The processing of your data is lawful because it is necessary for the performance of the contract concluded between you and the data controller in relation to your request to register for the webinar.	You are free not to provide your data for this purpose, but if you do not provide it, you will not be able to register for the webinar.

2. TO WHOM WILL MY DATA BE COMMUNICATED?

Your personal data may be shared with:

- external consultants for the fulfilment of all administrative activities;
- lawyers, experts, and insurance companies in the event of disputes;
- TeamSystem for the provision of management systems;
- cloud service providers for data storage.

It is noted that the newsletter is sent via Intuit - Mailchimp, an American company that has adhered to the data privacy framework (Participant Search (dataprivacyframework.gov)).

You may request the complete list of recipients of your personal data by writing to: privacy@studiolegalestefanelli.it.

In any case, your personal data will not be disseminated.

3. DATA PROCESSING METHODS

The processing will be carried out in a computerized and/or analog manner, in the ways and within the limits that are necessary to pursue the purposes indicated above, in compliance with the principles of Article 5 of the GDPR.

The processing will be carried out by the data controller and authorized persons, in compliance with all precautionary measures to ensure security and confidentiality.

Use of devices that make use of artificial intelligence systems: in providing the service, professionals may use of artificial intelligence systems.

These artificial intelligence systems guarantee the confidentiality of the personal data processed.

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The use of artificial intelligence systems by professionals remains primarily aimed at carrying out activities that are instrumental and supportive of professional activity, ensuring in any case the prevalence of the intellectual work which is the subject of the intellectual service provided.

The use of AI does not in any way replace the assessment, judgment, competence, and responsibility of professionals.

Further information on the systems used can be found in the specific Information Notice on the use of AI systems ([link](#)) and in the Code of Ethics adopted by the Law Firm, available on the website ([link](#)).

4. ARE MY DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?

Your data are transferred outside the European Union. The transfer of your data is lawful because the European Commission has determined that the third country to which they are transferred provides an adequate level of protection for your data.

5. HOW LONG WILL MY DATA BE STORED?

Data processed for the purpose of carrying out the assignment will be kept for the time necessary to carry out the requested activity, in compliance with the retention periods imposed by fiscal regulations and appropriate to ensure possible protection in terms of liability.

Data of persons involved in a professional assignment, processed for the purpose of communicating the activities and initiatives undertaken by the data controllers, are kept until the data subject objects.

Contact data processed for the purpose of communicating the activities and initiatives undertaken by the data controllers will be kept until the data subject withdraws their consent.

At the end of this period, the data controller will irreversibly delete the data by means of destruction or secure deletion methods, or keep it in an anonymous form that does not allow identification, even indirectly.

6. WILL I BE SUBJECT TO PROFILING?

In no case will your data be used to obtain information about your preferences or behaviour, nor will you be subject to any decision based solely on the automated processing of your personal data.

7. WHAT ARE MY RIGHTS?

You have the following rights:

- **Right of access to data:** the right to obtain confirmation from the Controller as to whether or not personal data concerning you are being processed and, if so, to gain access to your personal data – and a copy thereof – and to receive information related to the processing;
- **Right to rectification of data:** the right to obtain from the Controller, without undue delay, the rectification of inaccurate personal data concerning you and the completion of incomplete personal data, including by providing a supplementary declaration.
- **Right to data erasure:** the right to obtain from the Controller, without undue delay, the erasure of personal data concerning you for any of the following reasons:
 - The personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - The data subject objects to the processing, and there is no overriding legitimate reason to continue the processing;

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- The personal data have been processed unlawfully;
- The personal data must be erased to comply with a legal obligation to which the Controller is subject;
- The personal data were collected in connection with the offering of information society services.

• **Right to restriction of processing:** the right to obtain from the Controller a restriction on processing under one of the following conditions:

- You contest the accuracy of the personal data, for the period necessary for the Controller to verify the accuracy of the data;
- The processing is unlawful, and you object to the erasure of the personal data and instead request the restriction of their use;
- Although the Controller no longer needs them for processing purposes, the personal data are necessary for you to establish, exercise, or defend a legal claim;
- You have objected to the processing, pending verification of whether the Controller's legitimate grounds outweigh your own.

• **Right to data portability:** the right to receive, in a structured, commonly used, and machine-readable format, the personal data concerning you provided to the Controller and to transmit such data to another Controller if the processing is based on consent or a contract and is carried out by automated means.

• **Right to object to processing:** the right to object to processing carried out for the performance of a task in the public interest or in connection with the exercise of public powers or based on the Controller's or third parties' legitimate interests, as well as the right to object to the processing of personal data concerning you carried out for direct marketing purposes, including profiling insofar as it relates to such direct marketing.

• Right not to be subject to a **decision based solely on automated processing:** including profiling, which produces legal effects concerning you or similarly significantly affects you.

You may exercise your rights by sending a request to the Controller's email address: privacy@studiolegalestefanelli.it. The Controller will respond as soon as possible and, in any case, no later than 30 days from your request.

8. HOW CAN I FILE A COMPLAINT?

If you wish to file a complaint regarding how your personal data are processed by the Data Controller or regarding the handling of a complaint you have submitted, you have the right to lodge a complaint directly with the Italian Data Protection Authority following the procedures indicated on the website: www.garanteprivacy.it.