ECOVIS STLex
Studio Legale Tributario

Personal data processing information

With this notice, ECOVIS STLex – Studio Legale Tributario, as the Data Controller (hereinafter referred to as the "Controller"), informs you, in accordance with Article 13 of EU Regulation 679/2016 ("GDPR") and the relevant national legislation on personal data protection ("Privacy Regulation"), that your data will be processed in accordance with the terms and purposes outlined in the Assignment.

1. **Data Controller**

The Data Controller is ECOVIS STLex Studio Legale Tributario, represented by the legal representative pro tempore, with registered office at via della Chiusa n.15, 20123, Milan, Italy – VAT number 03022160109. For contact: privacy@stlex.it.

2. **Types of Data**

In the context of the Assignment, the Data Controller processes personal data related to the reference personnel (employees or collaborators) and/or the partners or administrators of the company you represent, to whom this notice is required to be communicated. This includes: name and surname; place and date of birth; email address; residential or domicile address; tax code; gender; health data; private and work address; phone and fax numbers; billing information; personal data capable of revealing any criminal convictions as well as ongoing criminal proceedings (judicial data); any other data connected with the performance of the activities subject to the ongoing relationship with you (hereinafter collectively referred to as "personal data" or simply "data").

The Data Controller may therefore process personal data (Personal Data: any information relating to an identified or identifiable natural person "data subject"; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person) and may process personal data related to criminal convictions and offenses under Article 10 of EU Regulation 679/2016.

Furthermore, especially in the employment law context, the Data Controller may process the following categories of personal data:

Health-related data: personal data concerning the physical or mental health of a natural person, including the provision of healthcare services, revealing information about their health status;

Special categories of data (Art. 9 EU Reg 679/2016): personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as processing genetic data, biometric data intended to uniquely identify a natural person, data related to the person's health or sexual life, or sexual orientation.

3. Purposes of Processing and Legal Basis

I) The personal data mentioned in point 2 above will be processed for the management of the activities related to the ongoing relationship with you and/or the company you represent, including legal, administrative, tax, accounting, and employment-related obligations. The processing of all categories of data may be necessary for compliance with legal obligations to which ECOVIS STLex – Studio Legale Tributario is subject, such as the requirements imposed by anti-money laundering and anti-terrorism regulations (Art. 6, para. 1, letter c) GDPR), and for the execution of the activities related to the ongoing relationship with you and/or the entrusted assignment (Art. 6, para. 1, letter b) GDPR). The legitimate interests of the Data Controller are also preserved (Art. 6, para. 1, letter f) GDPR). Providing such data is necessary for the execution of the aforementioned activities, and failure to provide them would result in ECOVIS STLex – Studio Legale Tributario being unable to proceed with the execution.

II) In addition to the execution of the aforementioned activities, only the personal data mentioned in point 2 above (excluding billing information, personal data capable of revealing any criminal convictions as well as ongoing criminal proceedings (judicial data), and any other data connected with the execution of the ongoing relationship with you) may be used by ECOVIS STLex – Studio Legale Tributario for sending communications related to its activities through newsletters, institutional communications, and invitations to events, using automated and individualized methods. This processing of data for secondary purposes, in terms of developing customer relations, is carried out based on the prior collection of freely given and informed consent. Providing data for this purpose is optional, and its non-provision does not affect the execution of the ongoing relationship with you. The Data Controller is obligated to collect consent from the Data Subject. The Data Subject always has the option to revoke the consent given.

4. Processing Methods

The processing of personal data is carried out through collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, communication, deletion, and destruction of data. The processing of data occurs through manual, paper, electronic, and telematic tools strictly related to the specified purposes and, in any case, in a manner that ensures the security and confidentiality of the data.

5. Data Retention/Duration of Processing

Generally, data processed for the primary purposes of the processing are retained until the achievement of the purposes for which they were collected. In the case of judicial litigation, the data is retained for the entire duration of the litigation, until the expiration of the terms for filing appeals, unless a different and justified term is applicable or for the legitimate interest of the Data Controller, and in any case for ten years as required by applicable laws (tax, civil, anti-money laundering) starting from the cessation of the ongoing relationship, professional service, or the execution of the occasional operation, subject to the legitimate interest of the Data Controller, legal obligations, and until the expiration of the statute of limitations for professional liability actions. The processed data will be retained for up to 24 months following the issuance of the consent given by the Data Subject for receiving communications related to activities through newsletters,

institutional communications, and event invitations, using automated and individualized methods. The Data Subject always has the option to revoke the consent to processing.

6. Data Access

Access to personal data is limited to the Data Controller, any Joint Data Controllers, and potentially the Data Processor (especially for IT technical support and System Administrator). Collaborators of ECOVIS STLex – Studio Legale Tributario are duly authorized to process data according to EU Reg 679/2016.

Access to personal data may be granted to third parties performing outsourcing/secondment activities on behalf of the Data Controller, with prior appointment as Data Processor if necessary, limited to the purposes specified in this notice and in compliance with GDPR regulations. Data may be disclosed for the purposes of the Assignment to external collaborators, legal representatives, counterparts and their defenders, any arbitrators and judges, or technical consultants, and in general to all parties for whom communication is necessary for the proper execution of the professional assignment. Personal data is not subject to dissemination nor to any fully automated decision-making process, including profiling.

7. Rights of the Data Subject

Data Subject: the natural person to whom the processed personal data refers.

The Data Subject can contact the Data Controller by writing to privacy@stlex.it to exercise their rights as provided by EU Regulation 679/2016. These rights include requesting access to personal data, rectification, erasure, restriction of processing, and objection to processing. The Data Subject can also exercise the right to data portability or the right not to be subject to a decision based solely on automated processing. Limitations potentially applicable under EU Regulation 679/2016 and current sector-specific regulations are duly acknowledged.

In the event that the processing is based on Article 6, paragraph 1, letter a), the Data Subject has the right to withdraw consent at any time without affecting the lawfulness of the processing based on the consent given before the withdrawal.

The Data Subject also has the right to lodge a complaint with a supervisory authority.

Furthermore, we inform you that the data will be:

Processed lawfully, fairly, and transparently.

Collected for the specified, explicit, and legitimate purposes and subsequently processed in a manner that is not incompatible with those purposes.

Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are acquired and processed ("data minimization").

Accurate and, if necessary, updated, deleted, and/or rectified.

Retained in a form that allows identification for a period not exceeding the achievement of the purposes for which they are processed, subject to the provisions in the "Data Retention/Duration of Processing" section.

Processed in a way that ensures adequate security of personal data, including protection through appropriate technical and organizational measures, to prevent unauthorized or unlawful processing and accidental loss, destruction, or damage.

The information in this notice, as well as any communications and actions taken under Articles 15 to 22 and Article 34, are provided free of charge. If the Data Subject's requests are manifestly unfounded or excessive, particularly due to their repetitive nature, the Data Controller may:

a) Charge a reasonable fee taking into account the administrative costs incurred to provide the information or communication or take the requested action; or

b) Refuse to fulfill the request. The Data Controller bears the burden of proving the manifestly unfounded or excessive nature of the request.

The Data Subject may also lodge a complaint with the competent authority using the most appropriate means, such as certified email to: protocollo@pec.gpdp.it or by registered mail with return receipt sent to: Garante per la protezione dei dati personali, Piazza Venezia, 11 - 00187 Rome.

8. Data Transfer

The data is stored on the servers of the Data Controller or third-party companies, if applicable, appointed as external Data Processors processing data on behalf of the Data Controller. These servers are located within the European Economic Area and/or according to cloud computing logics. In the case of data transfer outside the EU, standard contractual clauses contained in EU Commission Decision 2021/914 and measures of the Italian Data Protection Authority will be adhered to, as well as in accordance with Article 46 of EU Regulation 679/2016 and/or in compliance with the decision on the adequacy of the Data Privacy Framework - the U.S. regulatory framework on data protection for the transfer of personal data from the EU to the USA – issued by the European Commission.

9. Data Sharing

ECOVIS STLex – Studio Legale Tributario will treat personal data with care and confidentiality and will not share them with third parties other than those indicated, unless there is a clear and transparent specific communication approved and confirmed by you.

ECOVIS STLex – Studio Legale Tributario may share the personal data provided by you with third parties performing outsourcing/secondment activities on behalf of the Data Controller, with prior appointment as external Data Processors if necessary, or for tasks related to the assignment, limited to the purposes specified in this notice and in compliance with GDPR regulations. Alternatively, data may be shared with parties authorized to access personal data by legal provisions or by secondary or community regulations.

10. Data Protection

ECOVIS STLex – Studio Legale Tributario is committed to protecting the personal data provided. ECOVIS STLex – Studio Legale Tributario has implemented technical and

organizational security measures as per Article 32 of EU Regulation 679/2016. The Data Controller performs periodic checks regarding the privacy system.

Milan,

ECOVIS STLex Studio Legale Tributario

☐ I declare that I have received, read, and understood the privacy notice above.

☐ I consent to the processing of personal data for secondary purposes and therefore consent to receiving communications related to activities through newsletters, institutional communications, and event invitations, using automated and individualized methods.

Milan,

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