

## Privacy Notice for Personal Data Processing

With this information notice, ECOVIS STLex - Studio Legale Tributario, as the data controller (hereinafter the 'Data Controller'), informs you, pursuant to EU Regulation 679/2016 ('GDPR') and the applicable legislation, including national legislation, on the protection of personal data ('Privacy Legislation'), that your data will be processed in the following ways and for the following purposes.

### 1. Data Controller

The Data Controller is ECOVIS STLex Studio Legale Tributario in the person of its legal representative *pro tempore*, with registered office in via della Chiesa n.15, 20123, Milan, Italy - P.IVA 03022160109. For contacts: [privacy@stlex.it](mailto:privacy@stlex.it).

### 2. Purpose of processing

The Data Controller processes personal data referring to you and/or the relevant personnel (employees or collaborators) and/or the partners or directors of the company you represent, to whom you are required to communicate this information, such as first name and surname; place and date of birth; e-mail address; residence or domicile address; tax code; gender; private and work address; telephone and fax number; invoicing data; personal data that may reveal the existence of any criminal convictions as well as any criminal proceedings in progress (judicial data); any other data connected with the performance of the activity that is the subject of the relationship with you (hereinafter jointly referred to as 'personal data' or even just 'data').

The Data Controller therefore processes personal data (*Personal data: any information concerning an identified or identifiable natural person 'data subject'; an identifiable person is considered to be a natural person who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier or one or more characteristic elements of his or her physical, physiological, genetic, mental, economic, cultural or social identity*) and may process personal data relating to criminal convictions and offences pursuant to Article 10 of EU Reg. 679/2016.

### 3. Purposes of the processing and legal basis of the processing

I) The personal data referred to in point 2 above shall be processed for the management of the activity that is the subject of the relationship existing with you and/or with the company you represent, including the related legal, administrative, fiscal, accounting and labor law fulfilments. The processing of all the categories of data indicated may be necessary for the fulfilment of legal obligations to which ECOVIS STLex - Studio Legale Tributario is subject, such as, for example, the requirements of anti-money laundering, anti-terrorism regulations (art. 6, par. 1, lett. c) GDPR) and for the performance of the activity which is the subject of the relationship with you and/or the assignment given to us (art. 6, par. 1, lett. b) GDPR). This is without prejudice to the legitimate interest of the Data Controller (Art. 6(1)(f) GDPR).

The provision of such data is necessary for the performance of the aforesaid activity and failure to provide such data will result in ECOVIS STLex - Studio Legale Tributario being unable to execute it.

**ECOVIS STLex**  
Studio Legale Tributario

C.F. / P. IVA 03022160109

#### ▶ Milano

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II) In addition to the performance of the aforementioned activity, the only personal data referred to in point 2 above (excluding invoicing data, personal data that may reveal the existence of any criminal convictions as well as any ongoing criminal proceedings (judicial data) and any other data connected with the performance of the activity that is the subject of the relationship with you) may be used for the purpose of sending by ECOVIS STLex - Studio Legale Tributario, of communications related to the activity through newsletters, institutional communications and invitations to events, by automated and individual means.

This processing of data for secondary purposes, in terms of developing customer relations, is carried out on the basis of the prior collection of free and informed consent.

The provision of data for this purpose is free, and failure to provide it does not affect the performance of the activity that is the subject of the relationship with you. The Data Controller is obliged to collect the consent to the processing from the Data Subject. The Interested Party will always have the possibility to revoke the consent to the processing given.

#### **4. Processing methods**

The processing of personal data is carried out through the collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, communication, cancellation and destruction of data.

Data processing is carried out by means of manual, paper, computer and telematic tools with logics strictly related to the purposes themselves and, in any case, in such a way as to guarantee the security and confidentiality of the data.

#### **5. Retention of data/ Duration of processing**

As a general rule, the data processed for the primary purposes of the processing shall be kept until the purposes for which they were collected have been fulfilled and, in any case, for ten years as provided for by the laws in force (tax, civil law, anti-money laundering) starting from the termination of the professional service or from the execution of the occasional transaction, without prejudice to the legitimate interest of the Data Controller, ex lege fulfilments and until the statute of limitations for professional liability actions. The processed data shall be kept for up to 24 months after the consent given by the Data Subject to receive communications related to the activity through newsletters, institutional communications and invitations to events, by automated and individual means. This is without prejudice to the revocation of the consent to the processing by the Interested Party.

#### **6. Access to data**

Access to personal data is limited to the Data Controller, to any Data Processors and, if applicable, to the Data Processor and/or Sub-Processor (In particular for IT Technical Assistance and System Administrator). The collaborators of ECOVIS STLex - Studio Legale Tributario are duly Authorized to the processing pursuant to EU Reg 679/2016.

Access to personal data may be allowed to third parties who carry out outsourcing activities on behalf of the Data Controller, subject to appointment as Data Processor, if necessary, limited to the purposes envisaged in this Policy and in compliance with the GDPR. The data may be communicated - and if necessary for further purposes that may arise from the Assignment - to external collaborators, counterparties and their

representatives, to any arbitrators or technical consultants and in general to all parties to whom the communication is necessary for the proper performance of the professional assignment and/or consequent fulfilments. The data may also be communicated for the purposes of the Assignment to any consultants and experts indicated by the Company and towards whom the Company undertakes to regulate the privacy aspects, giving written notice thereof to ECOVIS STLex Studio Legale Tributario. Personal data shall not be subject to dissemination or to any fully automated decision-making process, including profiling.

## **7. Rights of the data subject**

Data subject: the natural person to whom the personal data being processed refer.

The Data Subject may contact the Data Controller by writing to [privacy@stlex.it](mailto:privacy@stlex.it) to exercise his/her rights, as provided for by EU Regulation 679/2016 and therefore: request access to personal data, rectification or erasure of personal data, restriction of processing, opposition to processing. You may also exercise the right to data portability or the right not to be subject to a decision based solely on automated processing.

This shall be without prejudice to any limitations that may apply pursuant to EU Reg. 679/2016 and applicable sector legislation.

In the event that the processing is based on Article 6(1)(a), the Data Subject has the right to withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given prior to the revocation.

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 purposes specified above, explicitly and legitimately, and subsequently processed in a way 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;

kept in a form which permits identification for a period of time not exceeding the purposes for which they are processed, without prejudice to what is regulated in the section 'Data Retention/ Duration of Processing'.

processed in such a way as to ensure adequate security of personal data - including protection by appropriate technical and organizational measures - in order to protect them against unauthorized or unlawful processing and against accidental loss, destruction or damage.

The information referred to herein and any communication and action taken pursuant to Articles 15 to 22 and Article 34 shall be free of charge. If the data subject's requests are manifestly unfounded or excessive, in particular because they are repetitive, the Controller may:

(a) charge a reasonable fee taking into account the administrative costs incurred in providing the information or communication or taking the requested action; or

(b) refuse to comply with the request. The burden of proving that the request is manifestly unfounded or excessive lies with the data controller.

The Interested Party may also lodge a complaint with the competent Authority using the method deemed most appropriate and therefore for example by certified e-mail addressed to: [protocollo@pec.gdp.it](mailto:protocollo@pec.gdp.it) or

by registered letter with acknowledgement of receipt addressed to: Garante per la

protezione dei dati personali, Piazza Venezia, 11 - 00187 Roma.

### **8. Data transfer**

The data are stored on the Data Controller's servers or at third party companies, appointed, where appropriate, as External Data Processors by processing the data on behalf of the Data Controller, whose servers are located within the European Economic Area and/or according to cloud computing logic. In the case of non-EU transfers, standard contractual clauses contained in EU Commission Decision 2021/914 and the measures of the Italian Data Protection Authority will be signed, as well as in accordance with the provisions of Article 46 of EU Regulation 679/2016 and/or in compliance with the adequacy decision of the Data Privacy Framework - the US data protection framework for the transfer of EU-US personal data - issued by the European Commission. L'Interessato potrà altresì proporre reclamo all'Autorità competente utilizzando la modalità ritenuta più opportuna e pertanto ad esempio tramite messaggio di posta elettronica certificata indirizzata a: protocollo@pec.gpdp.it ovvero mediante raccomandata A/R indirizzata a: Garante per la protezione dei dati personali, Piazza Venezia, 11 - 00187 Roma.

### **9. Data sharing**

ECOVIS STLex - Studio Legale Tributario will treat your personal data with care and confidentiality and will not share it with third parties other than those indicated therein, unless specific clear and transparent communication is approved and confirmed by you. ECOVIS STLex - Studio Legale Tributario may share the personal data you provide with third parties who carry out outsourcing activities on behalf of the Data Controller, subject to your appointment as External Data Processors, or in any case for specialization inherent to the assignment, limited to the purposes set out in this privacy policy and in compliance with the GDPR. regulations, or with parties whose right to access your personal data is recognized by legal provisions or secondary or EU regulations.

### **10. Data Protection**

ECOVIS STLex - Studio Legale Tributario is committed to protecting the personal data provided to it. ECOVIS STLex - Studio Legale Tributario has implemented technical and organisational security measures pursuant to Article 32 of EU Reg 679/2016. The Data Controller performs periodic audits in relation to the privacy system.  
Milan,

ECOVIS STLex Studio Legale Tributario

- I declare that I have received, read and understood the privacy policy above
- I consent to the processing of my personal data for secondary purposes and therefore I consent to receive communications related to the activity through newsletters, institutional communications and invitations to events, by automated and individual means.

Milan,

Date/ Signature