

**Privacy Notice on the Processing of Personal Data, pursuant to Article 13 of EU Regulation No. 2016/679 “GENERAL DATA PROTECTION REGULATION” (hereinafter “GDPR”) and Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018**

With this privacy notice, we wish to inform you about how our Company, ALF S.R.L. (hereinafter referred to as the Company or ALF), processes the personal data that you may provide to us as our client (or as a representative, in any capacity, of one of our clients). This privacy notice is published on the website [alfcreative.it](http://alfcreative.it), under the Privacy Policy section.

Unless otherwise specified, all legal articles cited in this document refer to the GDPR.

**1. Data Controller**

The Data Controller is the company ALF S.R.L., with registered office at Via Luigi Einaudi, 7, Alba (CN - 12051), Italy, VAT number 03915050045, reachable by phone at +39 0173 592970.

**2. Appointment RDP – DPO**

The Data Controller, not falling within the cases indicated in Article 37, nor those outlined in various interpretations by the Supervisory Authority, has deemed it unnecessary to appoint a Data Protection Officer.

**3. Subject of the Processing**

We emphasize that the legislation in question concerns exclusively personal data, that is, only data that can be traced back to NATURAL persons (Art. 2, paragraph 1 and Art. 4, paragraph 1), and not legal entities.

The processing concerns:

1. Names, surnames, telephone numbers, email addresses, duties and roles within your Company, which ALF consultants collect during the performance of their tasks, either in the pre-contractual phase or during the execution of the contract.
2. Personal data possibly present in the databases that ALF processes as Data Processor on behalf of your Company (which retains the role of Data Controller) for the execution of the activities provided for in the service contract your Company has entered into with ALF.

**4. Purpose of Processing, Legal Basis, Nature of Data Provision**

The personal data of which at point 3.1 are acquired within the normal relationship client/supplier, and are used by ALF only and exclusively for the organization of the activities provided by the contract (or by the contracts) in existence. The provision of these data is considered therefore mandatory, penalty the arising of difficulties in the execution of the contract. Such processing is lawful pursuant to art. 6, paragraph 1, letter b).

Except different indication by your Company, at the end of the contract these data acquired are kept by ALF, for follow-up activities on the projects developed or for activities of direct marketing. Such processing is lawful pursuant to art. 6, paragraph 1, letter f).

The personal data referred to in point 3.2 are processed within the scope of the execution of specific contracts. ALF processes these data (if present) only and exclusively where strictly necessary for the execution of the project requested and authorized by the client. This processing is mandatory, as it is fundamental for contractual execution, and is lawful pursuant to Article 6, paragraph 1, letter b). Should the databases provided for the contracted activity contain data pertaining to special categories, ALF requests from your Company explicit consent for the processing of such data, together with a declaration of lawfulness of communication of such data to third parties.

ALF's policy, unless expressly indicated otherwise by your Company, is to work on databases residing on servers owned by your Company (or otherwise selected by it), without in any way transferring information externally. This limits the processing to only possible reading and operational management of the data by consultants assigned to the relevant project. Should the contract provide different agreements, ALF acts as Data Processor of the data referred to in point 3.2, and implements security measures and internal policies suitable for the protection of the acquired data. ALF, in any case, makes available to your Company the documents describing the adopted security measures, the systems and places of processing and storage, the responsible parties, the authorized persons, and any risk analyses.

It is instead the responsibility of your Company to comply with the information and consent obligations towards the data subjects whose data are transferred to ALF within the projects related to existing contracts.

## **5. Methods of processing, duration of processing**

The personal data referred to in point 3.1 are collected directly at your Company or through direct communications: email, phone calls, messaging. Such data are stored in ALF's CRM, and are available in the consultants' agendas for common use (mainly email address books, corporate mobile phones). They are stored indefinitely (10 years from the last contact occurred), unless otherwise indicated by your Company.

The personal data possibly present in the databases referred to in point 3.2 may be processed, solely for the purposes indicated in point 4, for the duration of the contracted project only. In particular, personal data that ALF consultants become aware of during their activity (authorized by your Company) are in no way copied, extracted, stored, transmitted, or disseminated. ALF adopts internal informational policies so that all consultants maintain the highest level of confidentiality. In this case, it goes without saying that the processing has an extremely limited duration, and in any case extended at most to the duration of the project.

In the event that your Company explicitly requests ALF to manage some databases on its own servers (for example, for greater convenience/speed of development/security), the processing described above is enriched by storage, limited in time to the sole execution of the project. Consultants assigned to the project follow the confidentiality policies already described, while the system administrator ensures the secure archiving of data. The technical methods, data location, and security measures

adopted may vary depending on the level of security deemed appropriate, and are described in documents available, upon request, to your Company. In this case, as already specified, ALF acts as an external Data Processor.

Should some data among those indicated in point 3 have accounting, tax, or civil law relevance, the storage of such data will have the duration established by Italian law (typically 10 years).

## **6. Data Access**

Your data may be made accessible, for the sole purposes referred to in point 4), to employees, collaborators, and partners of the Data Controller, in their capacity as authorized processors and/or system administrators, or to third-party companies or other subjects performing outsourcing activities on behalf of the Data Controller, in their capacity as external data processors. The policies adopted by ALF provide for a careful selection of internal and/or external subjects who may have access to your Company's data, based on their skills and full adherence to the security and confidentiality rules imposed by ALF.

## **7. Data Communication**

Without the need for express consent (pursuant to Art. 6 letters b) and c) of the GDPR), the Data Controller may communicate your data referred to in point 3 to supervisory bodies, judicial authorities, as well as to those subjects to whom communication is mandatory by law for the fulfillment of the purposes referred to in point 4 or for specific purposes of the requesting entities.

These subjects will process the data in their capacity as independent data controllers. Such data will not, however, be subject to dissemination by ALF.

## **8. Data Transfer**

The personal data provided, referred to in point 3.1), are stored in electronic and/or paper format on servers and/or physical archives located at the Data Controller's headquarters, within the European Union. The data referred to in point 3.2), if stored/archived by ALF, reside on external Cloud servers, provided by ALF's partners, which in turn reside within the borders of the European Union. It is understood in any case that ALF, if necessary, will have the faculty to move archives and servers to other countries within the EU or even outside the EU, for example in the case of using Cloud services. In such case, the Data Controller hereby assures that the transfer of data outside the EU will take place in accordance with applicable legal provisions, following the stipulation of the standard contractual clauses provided by the European Commission, and that the Cloud used will guarantee an adequate level of security to ensure the confidentiality, integrity, and availability of the transferred data.

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

ALF guarantees to your Company the exercise of the rights provided by law for data subjects, and ensures cooperation in response to specific requests from data subjects, but does not guarantee (unless otherwise agreed with your Company) the direct exercise of rights by the data subjects themselves. In case of such requests, ALF will limit itself to forwarding the request from the data subject to your

Company.

Data subjects enjoy the rights referred to in Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR. In detail:

1. Right of access
2. Right to rectification
3. Right to erasure ("right to be forgotten")
4. Right to restriction of processing
5. Right to notification obligation in case of rectification or erasure of personal data or restriction of processing
6. Right to data portability
7. Right to object
8. Rights related to automated decision-making concerning natural persons, including profiling

#### **10. Methods of exercising the rights of the data subject**

Any data subject may at any time exercise their rights by sending:

1. A registered letter with return receipt addressed to the Data Controller, as indicated in point 1)
2. An email to the address [privacy@alfcreative.it](mailto:privacy@alfcreative.it)

*ALF SRL*