

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 196/2003 as amended by Legislative Decree 101/2018

With this privacy notice, we wish to inform you about how our Company, ALF S.R.L. (hereinafter “Company” or “ALF”), processes the personal identification and contact data collected from you or through publicly accessible and legitimate archives. This notice is published on the website alfcreative.it, under the Privacy Policy section.

Unless otherwise specified, all legal references 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), VAT number 03915050045, reachable by phone at +39 0173 592970.

2. Appointment RDP – DPO

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

3. Subject of Processing

We emphasize that the applicable regulation concerns exclusively personal data, meaning only data that can be linked to NATURAL persons (Art. 2, paragraph 1 and Art. 4, paragraph 1), and not legal entities. The processing concerns names, surnames, phone numbers, email addresses, job titles, and roles within your Company, acquired:

1. Through your business card (whether personal or representing a Company in any capacity), or through direct contact with our commercial staff;
2. Through contact details provided for information requests on the website;
3. Through public lists available online, to which you have voluntarily provided your data for commercial contact purposes;
4. Through any lists provided at events attended by ALF, containing your data only if you consented to such processing with each event organizer;
5. Through lists and forms filled out during events organized by ALF: workshops, training activities, corporate courses, forums, seminars, etc.

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

The personal data referred to in points 3.1, 3.2, 3.3, and 3.4 are acquired in the normal course of ALF’s commercial and relational activities and are used by ALF to respond to any requests from the client/user. The data referred to in point 3.5 are collected for the proper management of the activities for which they were collected and for direct marketing activities, which do not require consent as they fall under the legitimate interest of the controller (Art. 6, paragraph 1, letter f).

These data may also be used for general marketing activities, but only if the data subject has explicitly and voluntarily given their consent for this purpose, pursuant to Art. 6, paragraph 1, letter a) of the Regulation.

If the data subject disagrees with the processing activities carried out by ALF, they may object by exercising their rights, including restriction and blocking of processing, as indicated in point 9 of this document, following the procedures outlined in point 10 of this document.

5. Methods and Duration of Processing

The personal data referred to in point 3.1 are collected directly at your Company or through direct email messages. These data are stored in ALF's CRM and are available in the consultants' agendas for common use (mainly email address books and company mobile phones). They are kept indefinitely, unless your Company provides different instructions.

Personal data possibly present in the databases referred to in point 3.2 may be processed, solely for the purposes indicated in point 4, only for the duration of the contracted project. Specifically, the personal data that ALF consultants become aware of during the performance of their activities (authorized by your Company) are not copied, extracted, stored, transmitted, or disseminated in any way. ALF adopts internal information policies to ensure that all consultants maintain the highest level of confidentiality. In this case, it goes without saying that the processing has a very limited duration, and in any case, extends at most to the duration of the project.

If your Company explicitly requests that ALF store certain databases on its own servers (for example, for greater convenience, speed of development, or security), the above-mentioned processing is supplemented by storage limited in time to the execution of the project only. The consultants assigned to the project follow the confidentiality policies already described, while the system administrator ensures the secure storage of the 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 to your Company upon request. In this case, as already specified, ALF declares itself an independent Data Controller.

If some of the data referred to in point 3 have accounting, tax, or legal relevance, the retention of such data will be for the duration established by Italian law (typically 10 years).

6. Data Access

Your data may be made accessible, solely for the purposes described in point 4), to employees, collaborators, and partners of the Data Controller, in their capacity as authorized data processors and/or system administrators, or to third-party companies or other entities performing outsourcing activities on behalf of the Data Controller, in their capacity as external data processors.

The policies adopted by ALF include a careful selection of internal and/or external parties who may have access to your Company's data, based on their skills and full compliance with the security and confidentiality rules imposed by ALF.

7. Data Communication

Without the need for explicit consent (pursuant to Article 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 entities to whom the communication is legally mandatory for the

fulfillment of the purposes described in point 4) or for specific purposes of the requesting entities. These entities will process the data in their capacity as independent data controllers. Such data will not, however, be disseminated by ALF.

8. Data Transfer

The personal data provided, as referred to in point 3, are stored electronically and/or on paper on servers and/or physical archives located at the Data Controller's premises, within the European Union. It is understood that ALF, if necessary, may 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 cases, the Data Controller hereby ensures that the transfer of data outside the EU will comply with the applicable legal provisions, following the execution of the standard contractual clauses provided by the European Commission, and that the Cloud service used will guarantee an adequate level of security to ensure the confidentiality, integrity, and availability of the transferred data.

9. Data Subject Rights

ALF guarantees Your Company the exercise of the rights provided by the legislation for data subjects and ensures cooperation in response to specific requests from data subjects; however, it does not guarantee (unless otherwise agreed with Your Company) the direct exercise of these rights by the data subjects themselves.

In the event of such requests, ALF will merely forward the request from the data subject to Your Company.

Data subjects enjoy the rights set forth in Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR. Specifically:

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, erasure, 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 for Exercising Data Subject Rights

Data subjects may exercise their rights at any time 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

ALF SRL