

Information notice on the processing of personal data, pursuant to Article 13 of EU Regulation No. 2016/679 'GENERAL DATA PROTECTION REGULATION' (hereinafter 'GDPR'), and of Legislative Decree No. 196/2003 as amended by Legislative Decree No. 101/2018.

With this information notice, we wish to inform you about the ways in which our Company, ALF S.R.L. (hereinafter the Company or ALF), processes the personal data that you may provide to us as our supplier (or as a representative, in any capacity, of one of our suppliers). This information notice is published on the website alfcreative.it, under the section Privacy Policy.

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 its registered office at Via Luigi Einaudi 7, Alba (CN - 12051), VAT no. 03915050045, and can be contacted by phone at +39 0173 592970.

2. Appointment of RDP – DPO

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

3. Subject of the Processing

We emphasize that the applicable legislation concerns only personal data, meaning data that can be linked to NATURAL PERSONS (Article 2, paragraph 1 and Article 4, paragraph 1), and therefore does not apply to legal entities.

The processing concerns names, surnames, phone numbers, email addresses, job titles, and roles within your Company, which ALF consultants collect in the course of performing their duties, either during the pre-contractual phase or in the execution of the contract.

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

The personal data referred to in point 3 are collected as part of the normal customer/supplier relationship and are used by ALF solely and exclusively for the organization of the activities provided for in the current contract(s). The provision of such data is therefore considered mandatory, as failure to do so may result in difficulties in executing the contract. This processing is lawful pursuant to Article 6, paragraph 1, letter b) of the GDPR.

Unless otherwise indicated by your Company, at the end of the contract these collected data are retained by ALF for follow-up or support activities related to the developed projects (or for other operational/administrative needs connected to the supplier relationship). This processing is lawful pursuant to Article 6, paragraph 1, letter f) of the GDPR.

5. Methods of Processing, Duration of Processing

The personal data referred to in point 3 are collected directly from your Company or through direct communications such as email, phone calls, or messaging. These data are stored in ALF's CRM system

and are accessible in the consultants' calendars for shared use (mainly email directories and company mobile phones). They are retained indefinitely, unless otherwise instructed by your Company. If any of the data mentioned in point 3 are relevant for accounting, tax, or civil purposes, their retention period will comply with the duration established by Italian law (typically 10 years).

6. Data Access

Your data may be made accessible, solely for the purposes outlined 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 that carry out outsourced activities on behalf of the Data Controller, in their capacity as external data processors.

ALF's internal policies ensure a careful selection of both internal and external parties who may have access to your Company's data, based on their competencies and full compliance with the security and confidentiality rules required by ALF.

7. Data Disclosure

Without the need for explicit consent (pursuant to Article 6, letters b) and c) of the GDPR), the Data Controller may disclose your data referred to in point 3 to supervisory bodies, judicial authorities, as well as to those entities to whom disclosure is mandatory by law for the purposes outlined in point 4) or for specific purposes required by the requesting authorities.

These entities will process the data in their capacity as independent data controllers. Such data will not be disseminated by ALF.

8. Data Transfer

The personal data provided, as referred to in point 3), are stored in electronic and/or paper format on servers and/or in physical archives located at the Data Controller's premises within the European Union.

It is understood, however, that ALF may, if necessary, transfer archives and servers to other EU countries or even to non-EU countries, for example in the case of using Cloud services. In such cases, the Data Controller hereby ensures that any transfer of data outside the EU will be carried out in compliance with applicable legal provisions, including the prior signing of the Standard Contractual Clauses established by the European Commission, and that the Cloud services used will ensure an adequate level of security to guarantee the confidentiality, integrity, and availability of the transferred data.

9. Data Subject Rights

ALF guarantees your Company the ability to exercise the rights provided by law for data subjects and ensures its cooperation in response to specific requests made by data subjects. However, unless otherwise agreed with your Company, ALF does not guarantee the direct exercise of such rights by the data subjects themselves. In the event of such requests, ALF will simply forward the data subject's request to your Company.

Data subjects are entitled to the rights set out 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 regarding rectification or erasure of personal data or restriction of processing
6. Right to data portability
7. Right to object
8. Rights related to automated individual decision-making, 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 to the Data Controller, as indicated in point 1);
2. An email to the address privacy@alfcreative.it

ALF SRL