

## **Privacy and consent policy, pursuant to art. 13 of Regulation (EU) 2016/679**

Pursuant to art. 13 of Regulation (EU) 2016/679 (henceforth the GDPR) and having regard to personal data with which the firm is provided so that it may undertake its business practices, our policy is as follows:

### **Role as a Controller and Processor of Personal Data**

PG&Partners Milano are defined as a Data Controller as we are a professional body entrusted with a professional undertaking (henceforth the “professional body”). Our elect address for services is Corso Magenta 10, Milan. It is possible to contact the Data Controller by emailing [privacy@pgpartners.it](mailto:privacy@pgpartners.it).

### **Purposes of processing data**

We process data in order to be able to correctly and fully perform the professional duties entrusted to us, in both judicial and extra-judicial fora. We may also process your data for the following purposes:

- to fulfil our tax and bookkeeping obligations;
- to comply with all obligations incumbent upon the professional body pursuant to the regulations in force.

Your personal data may be processed in paper or electronic format (including portable devices). It shall be processed via methods strictly necessary for the aforementioned purposes.

### **Legal basis for processing**

Processing of your personal data by the professional body is considered lawful:

- when necessary for us to perform our professional mandate or perform a contract between you and the professional body, or when pre-contractual measures are taken upon request;
- when necessary for the professional body to comply with legal implications incumbent upon it;
- when authorised by express consent; this specifically regards newsletters and/or policies updated in line with new/updated legislation, information on events that we organise and company news issued via email and/or traditional post.

## **Consequences of failing to provide personal data to initiate a service**

Failure to supply the personal data that we require to perform new undertakings may constitute an impediment in fulfilling the related contractual relationship.

## **Data storage**

When processed for the aforementioned purposes, your personal data shall be stored for the full duration of the contract and, thereafter, for the period during which our firm and/or employees are obliged to retain it pursuant to legal standards or regulations or contractual obligations.

## **Communicating your personal data**

We may communicate your personal data to:

1. consultants, accountants or other legally authorised subjects providing services for the aforementioned purposes;
2. banking and insurance institutions providing services for the aforementioned purposes;
3. subjects that process the data in order to perform specific legal obligations;
4. judicial or administrative authorities in order to perform specific legal obligations.

## **Profiling and sharing data**

Your personal data shall not be shared nor shall it be subject to any decisions made in an entirely automated process or to profiling.

## **Data subject rights**

Among your rights pursuant the GDPR, the most relevant are your rights to:

- request that the professional body allow you (i) access to your personal data and data relating to it, (ii) to rectify inaccurate data or update incomplete data, (iii) to erase any or all of your personal data (in the event that one or more of the conditions set forth in art. 17, paragraph 1 of the GDPR should arise without prejudice to the exceptions set forth in paragraph 3 of the same article), (iv) to limit the processing of your personal data (in the event that any of the hypotheses set forth in art. 18, paragraph 1 of the GDPR should arise);
- in the event that the legal basis for processing is a contractual arrangement or consent and that processing is carried out using automatic methods, request and obtain your personal data from the professional body in a well-structured format that may be read from an electronic device. This includes any instance where you wish to transfer such data to another data controller (the so-called Right to data portability);
- object at any time to the processing of your personal data in a specific situation involving you;

- withdraw consent for your data to be processed at any time, where your consent for it to be processed for one of more specific purposes is the legal basis for such processing (for example your date and place of birth or home address), or where the data falls under specific data categories (for example data on your ethnicity, political opinions, religion, health or sexual orientation). In any case, processing on the legal basis of consent that was carried out prior to the withdrawal of such consent remains lawful;
- lodge a complaint with a Control Authority (Italian Data Protection Authority - [www.garanteprivacy.it](http://www.garanteprivacy.it)).