

PRIVACY POLICY (extended)

pursuant to Articles 13 and 14 of the GDPR

Consultants, professionals and external collaborators

Why this document is important

1.0

This document is of interest to you because it informs you how and why we process your personal data (🔥)

!! Important

When there is this symbol (🔥), you will find the definition of the word above in the Essential Glossary at the bottom!

This notice only concerns processing carried out for the purposes specified below (➔ 🗄️ **Why we process your data**).

This information does not replace any specific information that will be given to you when you use other services of the Controller.

This document may be updated over time: check back regularly!

Data controller (🔥)

1.0

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What are your rights

1.0

In the cases provided for by law, you have the right to **access your data**, to ask for them to be **corrected** and **deleted**; you also have the right to **object to the processing** of your data or to **ask for the processing to be restricted**; and you have the right to the **portability of your data**. Furthermore, you have the right to **revoke the consent** given to the Controller at **any time**, without affecting the lawfulness of the processing based on the consent given before revocation.

In any case, if you have any doubts or requests, please contact us (   ), we will be happy to hear from you!

!! Important

You as the Data Subject (🔥) may **exercise your rights** and **withdraw your consent** by notifying us at the contact details indicated.

In addition, you can lodge a **complaint with the Data Protection Authority** or **go to court** if you believe that the processing of your data is against the law.

Why we may process your data (legal bases)


1.0


Any processing of personal data must have an appropriate legal basis.


!! Important


Treatment is lawful when:

 **contract**: necessary to perform a contract to which the data subject is a party or pre-contractual measures requested by the data subject

 **consent**: the data subject freely, specifically informed and unequivocally manifests his/her consent

 **legal obligation**: necessary to fulfil a legal obligation to which the Controller is subject

 **legitimate interest**: necessary to pursue the legitimate interest of the Controller or of third parties

 **protection of vital interests**: it is carried out to preserve serious and present dangers to the life of the data subject


Why we process your data (purpose)

Consultants, professionals and external collaborators

1.0

The Controller processes the personal data of those who collaborate with him in order to manage and execute all aspects of the collaboration relationship (regardless of its legal nature), including related legal obligations. In particular, to perform obligations arising from the contract and/or to fulfil, prior to the conclusion of the contract, specific requests or pre-contractual measures aimed at establishing the relationship. In addition, it processes data to perform other activities connected with and instrumental to the performance of the contractual relationship (e.g.: administrative, management, tax and accounting fulfilments; managing correspondence; managing institutional bodies and offices; making estimates; receiving orders; agreeing appointments; informing on the status of the activity; managing payments and invoicing). The Data Controller may also process data to protect the company's assets, to carry out audits and monitor the quality of the service, to manage any disputes and in general to protect rights in extrajudicial and judicial proceedings.

Legal basis:  contract

 Important


The provision of data for this purpose is indispensable: if you do not provide us with them, we will not be able to provide the service or perform the activity

Legitimate interest

1.0

Data subjects' data often also have to be processed in order to perform tasks that are related to the company's activities, but which are not mandatory by law or by virtue of the contract between the parties. This refers in particular to actions aimed at protecting the company's assets; verifying the quality of the work carried out by the company; verifying regulatory compliance; preventing fraud; direct marketing; transferring intra-group data for administrative purposes; recovering company debts; managing any litigation; exercising or defending rights in litigation or before litigation.

Legal basis:  legitimate interest




 Important


We never process your data on the basis of legitimate interest if this may affect your rights and freedoms!

Obligations connected with what we do

1.0

The Data Controller processes the data in order to perform activities connected with and instrumental to the performance of the contractual or pre-contractual relationship with third parties (e.g.: administrative, managerial, tax and accounting fulfilments; managing correspondence; making estimates; receiving orders; agreeing appointments; informing on the status of the activity; managing payments and invoicing).

Legal basis:  contract |  legal obligation |  legitimate interest

 Important

Communication of data for this purpose is indispensable

Processing for this purpose is carried out on the legal basis of legitimate interest and legal obligation, so your consent is not required.

Respect the law

1.0

The Data Controller also processes the personal data of Data Subjects in order to comply with legal obligations (such as administrative, accounting and tax obligations) to which it is subject, to protect its rights, and to enable the exercise of the functions of judicial authorities.

!! Important

Communication of data for this purpose is indispensable.

Processing for this purpose is carried out on the legal basis of a legal obligation, so your consent is not required.

What data do we process

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Personal Data

1.0

We process personal data, i.e., all information concerning an identified or identifiable natural person.

!! Important

Your data is valuable: do not communicate any data that is not necessary for the request you make to us and do not communicate any data of third parties unless you have their consent to do so!

We may also learn about your particular data that you voluntarily share with us (such as: health, genetic or biometric data; trade union membership; political opinions; philosophical or religious beliefs; ethnic or racial origin; sexual life and sexual orientation).

 Examples of personal data we process:

- **identification data and contact details:** first name and surname; tax code; place and date of birth; nicknames; telephone number, e-mail, residence, domicile, head office; user name and password to access the systems that the Data Controller makes available to the Data Subject (corporate devices; e-commerce and reserved areas; websites and apps)
- **employment data:** employer; characteristics of the employment relationship (start, classification, job title, level, type of hours, etc.); wages paid or received, contributions paid or received; training and certifications; suitability for the job and any limitations
- **financial data:** IBAN and current account number; credit card number or other payment instruments; payments made or received; deposits and withdrawals; amounts and dates of incoming and outgoing transactions; names or co-ownership of assets)

Where we get your data (sources)

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We process data that you share with us directly (optionally, explicitly and voluntarily) using various channels (such as when you call or write to us, when you interact with our social profiles or when you use our website or app) and data that you have made public.





We also process data from public registers, lists and other public sources (e.g., balance sheets and other information from the Companies Register at the Chambers of Commerce; real estate deeds, registration of mortgages and other so-called prejudicial deeds; mass media and websites accessible to anyone).


We process data that we acquire from third parties, which you have commissioned (e.g., those who ask us for a service on your behalf) or which we have commissioned or others have commissioned (such as commercial information companies, external market research companies, etc.).


With whom we share your data

1.0

We share data with internal members of our organisation involved by reason of their assigned tasks and specifically entrusted with the processing (such as: employees and para-employees; interns, volunteers, temporary workers; partners, investors, directors; consultants and collaborators).

We may share data with third parties, outside our organisation, who help us do our work and achieve the stated purposes. These parties operate as autonomous data controllers or as external data processors: contact us (   ) if you want to know who they are!

The data will not be disseminated ().

 Examples of data recipients

- ☒ Public Administrations, Public Bodies and subjects, including private ones, with functions of public relevance (such as Municipalities, ASL, INAIL, INPS, Guardia di Finanza, Supervisory Authorities, Revenue Agency, Judicial Authorities, etc.), to the extent that the prerequisites set out in the legislation are met
- ☒ external consultants and professionals (such as lawyers, accountants, labour consultants and data processing centres, DPOs, RSPPs, freelancers, journalists, coaches)
- ☒ parties managing the operation of the website, app and in general of the company's IT systems and telecommunications networks (e.g.: web agencies; providers of cookies and other tracking tools; newsletter providers; software houses; web providers; hosting providers)
- ☒ entities performing banking, financial and insurance services
- ☒ couriers, carriers and other entities performing delivery services for communications or products, and related activities

How long we keep your data

1.0

We retain data for the minimum time necessary to fulfil the purpose.


Longer only if it serves to comply with legal obligations, fulfil orders given by public authorities, or pursue a legitimate interest (such as exercising or defending a right in litigation)

Important

If your consent is required (e.g., for marketing purposes), we will process your data as long as you agree. Indeed, you can withdraw your consent to data processing at any time by notifying us (**opt-out**), but in that case we may no longer be able to provide you with certain activities and/or services.

How we process your data

1.0

We take the appropriate security measures to protect your data and carry out the processing () required by law: collection, registration, organisation, storage, consultation, processing, use, modification, selection, extraction, restriction, communication, deletion and destruction of data.

Data transfer abroad

1.0

Data are not transferred to non-EU countries

Essential glossary

1.0

- ☒ **Personal data:** any information relating to an identified or identifiable natural person)
- ☒ **Dissemination:** giving knowledge of the data to unspecified persons, in any form, including by making them available or consulting them. E.g.: publishing a photo online or on a social network
- ☒ **DPO:** Data Protection Officer, whose functions also include acting as intermediary between Data Controller and Data Subject)
- ☒ **Data subject:** natural person to whom the personal data refer)
- ☒ **Data controller:** who determines the purposes and means of processing)
- ☒ **Processing:** any operation or set of operations carried out with or without the help of automated processes and applied to personal data or sets of personal data)

Notes

Done by Owner with  **StudioFLEX - labour lawyers** ( www.studioflex.it,  gdpr@studioflex.it)