

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA OF COMPANIES
ARTICLES 13 and 14 OF REGULATION (EU) 2016/679 ("GDPR")

1. CONTACT DETAILS OF THE DATA CONTROLLER AND OF THE DATA PROTECTION OFFICER

DATA CONTROLLER	W EXECUTIVE S.R.L. Registered office: via P. Nenni 18, Brescia VAT No.: 04216420986 Tax Code: 04310290988 info@pec.w-executive.it
DATA PROTECTION OFFICER (DPO)	EUCS S.r.l.s. Unipersonale VAT No.: 04709650289 Telephone: 049-8764539 e- mail: info@eucs.it Certified e-mail: info@pec.eucs.it

2. CATEGORIES OF DATA BEING PROCESSED AND DATA SOURCES

- 2.1 Whereas this privacy notice is also to be understood as being given to natural persons who enter into a contractual relationship in the name and on behalf of the legal person, as well as to employees/contractors who manage the contractual relationship in the name and on behalf of the legal person. Therefore, the data processed are identification data, including, but not limited to, first name, surname, place and date of birth, tax code, company data, landline and mobile telephone contacts and e-mail address.
- 2.2 Data are collected from data subjects by post, fax, e-mail, by hand at your premises or by registration of an Application Form in our database. The types of data subject to the processing are common data.

3. PURPOSES AND LEGAL BASIS OF THE PROCESSING AND DATA STORAGE PERIOD

WHY DO WE PROCESS YOUR DATA?	WHAT ARE THE CONDITIONS FOR LAWFUL PROCESSING?	HOW LONG DO WE KEEP YOUR PERSONAL DATA?
For purposes related or instrumental to the establishment, performance and termination of the employment relationship.	Performance of steps prior to entering the contract or during the performance of the contract (point (b) of Art. 6(1) of GDPR).	For 11 years (i.e. the term of the applicable statutes of limitation in our legal system, plus one year).
For the purposes of carrying out business activities consisting, specifically, in telephone communications by our staff or in sending information and promotional material concerning our services and initiatives either through	Either the data subject has given consent or the relationship is with a private bank (point (a) of Art. 6(1) of GDPR).	For 36 months since the last activity performed, unless the data subject objects to processing.

newsletters, telefax or e-mail, as well as in the performance of market research, direct sales of services and commercial communications.		
To allow you to receive other services, your data may be disclosed to entities of the group W Group Holding S.p.a. of which W Executive S.r.l. is part.	The data subject has given consent (point (a) of Art. 6(1) of GDPR).	In accordance with the privacy policy of each group company.
After the above-mentioned retention periods have elapsed, all data will be deleted or rendered anonymous and paper media will be destroyed.		

4. MANDATORY PROVISION OF DATA

- 4.1 The provision of data is compulsory for the establishment and conduct of the contractual relationship (except for personal data for which specific consent is required as set out under point 3). Refusal to provide the data will prevent the Company from carrying out the above activity.
- 4.2 The provision of any other data is optional.

5. CATEGORIES OF DATA RECIPIENTS

- 5.1 The data may be disclosed to entities acting as autonomous data controllers, including, but not limited to, the Companies belonging to WGroup Holding S.p.a., the Company's customers, public bodies, etc., subject to your prior explicit consent, or to fulfil pre-contractual and contractual legal obligations.
- 5.2 Your personal data may be processed, on behalf of the Company, by other subjects appointed as Processors or Controllers, a list of which is available at the registered office of W Executive S.r.l.

6. LOCALISATION AND TRANSFER OF DATA

- 6.1 For personal data processing, W Executive S.r.l. makes use of an IT infrastructure located in the European Union.
- 6.2 In case of reliance on suppliers based outside the European Union, we will check in advance that they have consistent security measures in place and that they fulfil the guarantees provided for by the European Privacy Regulation.

7. PERSONS AUTHORISED TO PROCESS DATA

The data may be processed by employees of company departments or third parties assigned to the pursuit of the above-mentioned purposes, who have been expressly authorised to process personal data and have received appropriate operating instructions.

8. RIGHTS OF DATA SUBJECTS

- 8.1 You have the right to request to the Controller access to and rectification or erasure of personal data concerning yourself, the right to have incomplete personal data completed, the right to restriction of processing in the cases provided for by Article 18 of the GDPR¹; the right to receive the data in a structured, commonly used and machine-readable format, as well as, if technically feasible, to transmit those data to another controller without hindrance if the conditions for exercising the right to portability pursuant to Article 20 of the GDPR are met (the processing is based

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on consent pursuant to point (a) of Article 6.1 or point (a) of Article 9.2 or on a contract pursuant to point (b) of Article 6.1 and is carried out by automated means).

- 8.2 You have the right to object to processing on grounds relating to your particular situation, for the pursuit of purposes based on the legitimate interests of the Company and, in particular, you have the right to object to any further processing of your data collected on-line.
- 8.3 You may exercise the above rights by writing to privacy@wexecutive.eu or you may contact the DPO - EUCS S.r.l.s. Unipersonale at the contact details provided above.
- 8.4 Data subjects who consider that the processing of personal data relating to them carried out by the Controller infringes the provisions of the GDPR have the right to lodge a complaint with the Data Protection Supervisory Authority (Article 77 of the GDPR) or to take legal action (Article 77 of the GDPR).

DECLARATION OF ACKNOWLEDGEMENT OF THE PRIVACY NOTICE

I declare that I have received and read the privacy notice on the processing of my personal data.

Place: _____

Date: __/__/__

Legible name and surname: _____

Signature: _____

DECLARATION OF CONSENT TO RECEIVE COMMERCIAL COMMUNICATIONS

I declare that I have read the information on the processing of personal data provided by W Executive S.r.l. and, being aware that my consent is optional and that I have the right to withdraw it at any time, I hereby express my consent to the processing of my personal data for the receipt of information for marketing purposes.

- ☐ I give my consent
☐ I refuse consent

DECLARATION OF CONSENT TO THE DISCLOSURE OF PERSONAL DATA TO COMPANIES BELONGING TO W-GROUP HOLDING S.P.A.

I declare that I have read the information on the processing of personal data provided by W Executive S.r.l. and, being aware that my consent is optional and that I have the right to withdraw it at any time, I hereby express my consent to the disclosure of my personal data.

- ☐ I give my consent
☐ I refuse consent

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