### Privacy Law art. 13-14 Reg EU 2016/679

#### **Customers:**

Pursuant to and for the purposes of the provisions of art. 13 of the European regulation 2016/679 concerning the protection of personal data ("GDPR") and national privacy regulation, we inform you that your personal data will be processed through electronic instruments, hand tools, and Social networking, in Italy (and /or abroad). This informative report, drawn up on the basis of the principle of transparency and of all elements required by the single sections each of which is divided into GDPR is a specific topic in order to make reading quicker, smoother and easy to understanding the following "policy".

#### WHO IS THE OWNER OF THE TREATMENT

Welcomeservice di Paola Berlenghini 06059-Todi, Via Santa Prassede 29, as the holder of your personal data, pursuant to the effects of the EU Reg.to 2016/679 below is GDPR, hereby informs you that the mentioned provision envisages the protection of interested parties regarding the processing of personal data and that such treatment will be imprinted to the principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

Your personal data will be treated in accordance with the aforementioned law and privacy obligations provided therein.

#### **DATA PROTECTION OFFICER**

Company/MS/MS not designated as optional Cod P.IVA/Tax Code Contact (Phone/Fax/e-mail)

#### **LEGAL BASIS and purpose of processing**

| Point A) necessary treatment to p | roper management of the  | relationship |             |
|-----------------------------------|--|--------------|-------------|
|                                   |  |              |             |
| Data treatment                    | Accounting and tax management  |              |             |
|                                   |  |              |             |
| Finality                          | Active and passive tax billing   |              |             |
| Treatment type                    | Interior   | Data type    | Common Data |
|                                   | Start: End: Ten years due legal obligations                                  |              |             |
| Treatment duration                |  |              |             |
| Paper conservation                | Operational headquarters   |              |             |
| Digital preservation              | \\BERLENGHINI  |              |             |
|                                   |  |              | -           |
| Data treatment                    | Lease and sale properties  |              |             |
| Finality                          | Cadastral data<br>management plans,<br>mandates, title deeds and<br>receipts |              |             |
| Treatment type                    | Interior   | Data type    | Common Data |
| Treatment duration                | Start: End:<br>Total period related to the<br>term of Office                 |              |             |
| Paper conservation                | Operational headquarters   |              |             |
| Digital preservation              | \\BERLENGHINI  |              |             |

| Data treatment | Real estate management services |
|----------------|---------------------------------|
|----------------|---------------------------------|

| Finality             | Provision of generic<br>services and maintenance<br>of real estate assets |           |             |
|----------------------|---|-----------|-------------|
| Treatment type       | Interior  | Data type | Common Data |
| Treatment duration   | Start: End:<br>Total period related to the<br>term of Office              |           |             |
| Paper conservation   | Operational headquarters  |           |             |
| Digital preservation | \\BERLENGHINI   |           |             |

# Point B) optional Treatments necessary for provision of additional services

| Data treatment       | Activities Marketing marketing activities                                 |           |             |
|----------------------|---|-----------|-------------|
| Finality             | Commercial communications on real estate opportunities promotion activity |           |             |
| Treatment type       | Interior  | Data type | Common Data |
| Treatment duration   | Start: End:<br>Managing data limited to<br>the period of interest         |           |             |
| Paper conservation   | Operational headquarters  |           |             |
| Digital preservation | \\BERLENGHINI   |           |             |

The processing of functional data for the performance of such obligations is necessary for the proper management of the relationship and their contribution is required to implement the purposes identified above to the letter a). His failure, partial or incorrect conferment could make it impossible to initiate commercial contractual obligations required.

The titular also notifies that, any missing or incorrect communication of the obligatory information may result in the inability of the holder to guarantee the respect of the treatment itself.

In addition, the transfer of your data for the specific purposes of point b) is optional, but refusal will make it impossible for Welcomeservice di Paola Berlenghini to give your request and contact you.

In any case you may revoke your consent, even partially, for example by agreeing to only traditional contract mode.

#### **MINORS**

The personal data of children with an age of 16 years will not be processed by the data controller, without prior authorisation of the holder of parental responsibility.

#### **LEGITIMATE INTERESTS OF THE OWNER**

The owner has a legitimate interest in transferring personal data to companies within the group for administrative purposes, internal reporting and analytics.

# DATA PROCESSING METHODS AND SUBJECTS OUTSIDE YOUR COMPANY TO WHOM PERSONAL DATA MAY BE COMMUNICATED

Your personal information (including name, address, email, phone, address of residence and/or residence, date and place of birth, social security number) may be treated in a paper and/or computer scientist, and will be used only by persons authorized per treatment and by persons designated as responsible and/or trustees in respect of GDPR in order to perform correctly all processing activities necessary to fulfill the purposes referred to in this statement. Your personal data may be disclosed to public bodies or judicial authorities, where required by law or to prevent or repress the Commission of a felony and:

- Who is legitimate addressee of communications required by laws and regulations (such as offices or public authorities);
- Company and/or professional associates and/or individuals and their associates to manage administrative and tax services we use to fulfil their legal or contractual obligations.

Each treatment takes place in accordance with the modalities laid down in articles. 6 and 32 of GDPR and through the adoption of appropriate security measures.

#### INTERNAL SUBJECTS TO WHOM DATA CAN BE COMMUNICATED

Your data will be communicated exclusively to competent subjects and duly appointed for the performance of services which are necessary for the proper management of the relationship, with a guarantee of protection of the rights of the person concerned. Your data will be processed only by expressly authorized by the owner and, in particular, by the following categories of authorized:

• Responsible data processors inside the company accountant and commercial functions.

#### WHERE YOUR DATA WILL BE PROCESSED

Your personal data will be processed by the holder within the territory of the European Union. If for technical and/or operational issues it is necessary to make use of persons located outside of the European Union, please note right now that these individuals will be appointed data supervisors within the meaning and for the purposes of art. the 28 GDPR and transfer of personal data to these entities, limited to the conduct of specific treatment activities, shall be governed by a contract of appointment of compliance with warranties and laid GDPR.

Will be implemented all necessary precautions in order to ensure the total protection of your personal data basing such transfer on the evaluation of suitable safeguards including but not limited to, decisions of adequacy of third countries, recipients expressed by the European Commission; assurance expressed by third party recipient in accordance with article 46 of GDPR.

In each case may require more detailed description on "data controller" If your personal details have been processed outside the European Union, requiring evidence of specific promises taken **HOW LONG will be processed and WE KEEP YOUR PERSONAL INFORMATION** 

Please note that, in accordance with the principles of legality, purpose limitation and data minimisation, accordance with art. 5 of GDPR, your personal data will be kept for the time necessary to achieve the purposes related to the above point). In particular, your personal data will be processed for a minimum period of time necessary up to the termination of the contractual relationship between You and the owner of the treatment without prejudice to a further period of conservation which may be imposed by law.

Your data will be retained for a further period for the purposes of dispute and litigation.

## The RIGHTS OF THE INTERESTED PARTY

You have the right to obtain from the data controller the erasure (right to be forgotten), the limitation, the updating, correction, portability, opposition to the treatment of your personal data, as well as in General may exercise all rights provided for by art. 15, 16, 17, 18, 19, 20, 21, 22 of GDPR.

## EU regulation 2016/679: art. 15, 16, 17, 18, 19, 20, 21, 22-data subject's rights

1. The interested party has the right to obtain confirmation of the existence or not of personal data , even if not yet recorded, and their communication in intelligible form.

- 2. The interested party has the right to be informed: the origin of personal data;
- the purposes and methods of processing;
- the logic applied in case of treatment with electronic instruments;
- of the identification data concerning data controller, data processors and the representative appointed under article 5, paragraph 2;
- the subjects or categories of subjects to whom the personal data may be communicated or who may come to knowledge of it as designate representative in the territory of the State, managers or agents.
- 3. The person concerned is entitled to obtain:
- updating, correction or, when interested, integration of data;
- the erasure, anonymization or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- certification that the operations as per letters a and b)) have been notified, as also related to their contents, to those to whom the data were communicated or disseminated, unless where this proves impossible or involves a manifestly disproportionate to the protected right; data portability.
- 4. The interested party has the right to object, in whole or in part:
- for legitimate reasons the processing of personal data, pertinent for collection purposes;
- the processing of personal data for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication.

| You can exercise your rights by contacting info@welcomeservice.it, attaching a copy of the document of identity. In any case, will always have the right to bring a complaint to the competent supervisory authority (authority for the protection of |
|---|
| personal data), in accordance with art. 77 GDPR considers that your data be contrary to Privacy legislation in force. Signature of the  |

| holder of the treatment |
|-------------------------|
|                         |
|                         |
|                         |
|                         |

# **CONSENT TO THE PROCESSING OF PERSONAL DATA**

Commission Regulation (EU) 2016/679

| The undersigned   |   |                    |               |                   |
|---|---|--------------------|---------------|-------------------|
| Born in   | . – – – – – – – – – – – – – – – – – – – |                    |               |                   |
| Tax code  |   |                    |               |                   |
| Living in   | Address                                 |                    |               | no                |
| Tel   | e-mail                                  |                    |               |                   |
| Having been informed:   |   |                    |               |                   |
| the identity of the data controller   |   |                    |               |                   |
| the identity of the data protection officer   |   |                    |               |                   |
| the extent, how the data are processed  |   |                    |               |                   |
| the purpose of processing personal data   |   |                    |               |                   |
| the right of withdrawal of consent  |   |                    |               |                   |
| As indicated by the letter a) and b) signed statement Commission Regulation (EU) 2016/679           | nt according to art. 13 of the          |                    |               |                   |
| ALLOWS  |   |                    |               |                   |
| Within the meaning and for the purposes of art. personal data in the manner and within the limits o |   | 2016/679, by signi | ng this form, | the processing of |
|   |   |                    |               |                   |

Read, confirmed and signed (town and date)

Signature of declarant (full and legible)