

REACHUP REGULATORY NETWORK ITALY – RNI SRL Via Plutarco, 13 - 20145 MILANO – (IT) tel. +39 02 36563129 – +39 02 36745533 – Fax +39 02 36634124 mail: <u>info@reachup.it</u> - www.reachup.it - PEC: reachup@pec.it -SKYPE: Reach-up – codice SDI M5UXCR1

Information pursuant to article 13 of the European Reg. 2016/679 of 27 April 2016 – GDPR

The European Regulation 2016/679 of 27 April 2016 (GDPR) establishes, in article 13, the obligation to inform interested parties about the methods of processing their personal data using clear, easily understandable and easily accessible.

On the basis of this provision, the company, with this information, brings the following information to the attention of all interested parties.

Data Controller: RNI srl based in via Plutarco 13 - 20145 Milan (IT), hereinafter referred to as the sole Controller, in the person of the legal representative Luca Segato.

Purpose of processing: The data provided by the interested party is collected and used by the Data Controller within the limits and in compliance with the relevant legislation, for

- purposes connected and instrumental to the management of the supply activity,
- administrative and accounting purposes,
- commercial and marketing purposes only in case of consent.

Processing methods – Knowledge. In particular, the personal data of the data subject are collected mainly by means of IT tools and recorded in our electronic databases, following specific checks, including computerized ones, aimed at ensuring their consistency, completeness and accuracy.

All in compliance with the minimum-security measures provided for by the GDPR n. 679/2016.

Data processing consists in carrying out the following operations; a) collection; b) recording on computer media; c) organization; d) conservation, e) consultation; f) processing; g) modification; h) selection; i) extraction; l) comparison; m) use; n) interconnection; o) block; p) communication; q) cancellation; r) destruction; s) any other operation necessary and / or useful for the correct management of the data collected and using, by the Data Controller and his appointees, a specific code of conduct which provides for the procedures governing the use, storage and destruction of the collected data.

However, the acquisition of sensitive data is excluded.

Nature of the data provision - the data requested from the interested party and provided by the same to the Owner, are collected, both in the interest of the interested party and of the Owner, to ensure the proper management of the relationship between them.





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Dissemination and communication of data - The data covered by this document will not be disclosed to third parties but may or must be disclosed to fulfill the purposes of the processing, previously mentioned in Italy, without any transmission abroad, to a third country or to an international organization.

Without your express consent (pursuant to Article 24 letter a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to in art. 2.A) to Supervisory Bodies and Judicial Authorities, as well as to all other subjects to whom communication is mandatory by law. However, it ensures that your personal data will never be made public on the owner's website.

Data access: Access to the personal data of the interested party is allowed to the following categories that carry out activities in the name and on behalf of the Data Controller or are subjects connected to it:

- category made up of employees and collaborators (in charge) as internal referents for the processing,
- category made up of companies and / or external subjects who intervene as external data processing managers,
- bodies for surveying the quality of services, third-party companies for information / commercial promotion purposes,
- banks or credit institutions,
- Judicial authority.

Data retention period: The Data Controller will process personal data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the relationship for the purposes of service and for no more than 2 years from the collection of data for the other purposes. In compliance with the provisions of art. 5 paragraph 1 letter. e) of EU Reg. 2016/679, the personal data collected will in any case be stored in a form that allows identification of the data subjects for a period of time not exceeding the achievement of the purposes for which the personal data are processed.

Refusal of consent and revocation of the same: The interested party has the right to refuse consent to the processing of their data and the right to revoke, at any time, the consent previously given. Direct consequences of such behaviors are the impossibility of starting or continuing the relationship based on which the collection of personal data was necessary

In your capacity as an interested party, you have the rights referred to in art. 7 of the Privacy Code and art. 15 GDPR and precisely the rights of:

- I. obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- II. obtain the indication: a) of the origin of personal data; b) the purposes and methods of the processing; c) of the logic applied in case of processing carried out with the aid of electronic tools; d) the identity of the owner, managers and designated representative pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, GDPR; e) the subjects or categories of subjects to whom the





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personal data may be communicated or who can learn about them as appointed representative in the State, managers or agents;

- III. obtain: a) updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment is proves impossible or involves the use of means that are manifestly disproportionate to the protected right;
- IV. object, in whole or in part: a) for legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the interested party to exercise the right of opposition also only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications, or neither of the two types of communication.

Where applicable, you also have the rights referred to in Articles. 16-21 GDPR (Right of rectification, right to be forgotten, right to limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

You can exercise your rights at any time by sending:

- a registered letter with return receipt to the company headquarters: RNI srl via Plutarco 13 20145 Milan (IT);
- an e-mail to the address: info@reachup.it

This Site and the Controller's Services are not intended for minors under the age of 18 and the Controller does not intentionally collect personal information relating to minors. If information on minors were unintentionally registered, the Data Controller will delete them in a timely manner, at the request of the users.

For more information on data processing activities and for any specific request, contact the data controller directly: Luca Segato - at the email: info@reachup.it

The interested party is granted the right to ask the data controller to correct or delete personal data or limit the processing of personal data concerning him or to oppose their treatment (pursuant to art.15 of RE 679 / 2016); it is also allowed to lodge a complaint with a supervisory authority in the event of non-compliance with the legislation in question.





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INFORMATION FOR MARKETING ACTIVITIES

If you decide to join the marketing activities, the same indications reported in the general information are applied, except for the following aspects:

To the defined processing purposes, is added that of marketing initiatives, with the possibility of contact by e-mail, post or telephone for the presentation of the services, activities and promotional initiatives that RNI srl considers of possible interest for the customer.

The data processing time is 10 years, except for a request for cancellation by the interested party. The marketing activity is managed directly by RNI srl or by directly appointed persons, in compliance with the methods indicated in this statement.

The transfer of data to third parties is not envisaged, for uses other than those stated in this information.

INFORMATION IN CASE OF SUBSCRIPTION TO THE NEWSLETTER

If you decide to subscribe to the Newsletter, the same indications reported in the general information are applied, except for the following aspects:

To the defined processing purposes, is added that of sending newsletters for the presentation of activities, updates and promotional initiatives, which RNI srl considers of possible interest to the customer.

The data processing time is 10 years, except for a request for cancellation by the interested party. The activity of sending newsletters is managed directly by RNI srl or by directly appointed subjects, in compliance with the methods indicated in this information.

The transfer of data to third parties is not envisaged, for uses other than those stated in this information.

