

Information on the processing of personal data

(updated version of May 25th, 2021)

The Partners of the Sircle Project, i.e. Consulnet Italia S.r.l. and Rödl & Partner Associazione Professionale as data controllers (hereinafter, "Controllers"), inform you pursuant to EU Regulation 2016/679 ("GDPR") and Legislative Decree no. 196/2003, as amended by Legislative Decree no. 101/2018, that your data will be processed in the manner and for the following purposes.

1. Scope of the processing

The Data Controllers process personal identification and non-special / sensitive data (hereinafter, "Personal Data" or even "Data") communicated by you when browsing the website www.progettosircle.it (hereinafter, "Site"), of the request for information or registration to events organized by the Data Controllers (hereinafter, "Events").

In particular:

- name, surname, address, email needed to request information or to register for the Events;
- navigation data such as IP addresses or domain names of the computers used by users who connect to the Site, the addresses in URI (Uniform Resource Identifier) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment. This information is collected through the cookies described in the Cookie Policy of the site to which reference is made.

2. Purpose and legal basis of the processing

Consulnet Italia S.r.l. and Rödl & Partner Associazione Professionale, as joint data controllers (hereinafter, "Joint Controllers") will process your Personal Data for the following service purposes and legal bases:

- the execution of the contract and / or the fulfillment of pre-contractual commitments, ie to allow you to browse the Site, register and participate in Events as well as to manage requests for contact and information;
- the fulfillment by the Joint Controllers of legal obligations, ie to comply with obligations under laws, regulations or national and EU legislation or imposed by the competent authorities;
- the pursuit of a legitimate interest of the Joint Controllers, ie to exercise legal rights and manage any disputes, as well as to verify and prevent harmful events for the Site and to maintain and update the Site;
- your prior express consent to carry out statistical activities aimed at optimizing and improving navigation on the website through the use of the cookies described in the Cookie Policy of the website to which you are referred. In this case, the specific consent for each type of cookie will be requested through the cookie banner of the Site.

Consulnet Italia S.r.l. will process your Personal Data as independent Data Controller, only with your consent, for communication purposes, i.e. to send you, via ordinary letters, email and / or through its newsletter, news and updates relating to the main news and events in relation to the consultancy and training services offered, as well as to inform you of its initiatives and offers, including for promotional purposes.

Rödl & Partner Associazione Professionale will process your Personal Data as an independent Data Controller, only with your consent if you are not already a customer, for communication purposes, i.e. sending, if you are not our customer, updates via and -mail and newsletters, relating to regulatory, jurisprudential, training and professional activities of the Firm.

3. Processing methods

The processing of Personal Data is carried out, with electronic and paper methods, by means of the operations of collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of some data.

4. Data Retention

The Joint Controllers will process the Personal Data for the time necessary to fulfill the aforementioned purposes and in any case, except for the different time indicated in the Cookie Policy in relation to the processings carried out through the use of cookies, for no more than 5 years from the Event or request for information and in any case according to the period required by law. Furthermore:

- Consulnet Italia S.r.l. will process your data for no more than 2 years from collection for communication purposes;
- Rödl & Partner Associazione Professionale will process your Data for no more than 2 years from collection for communication purposes.

5. Provision of Data

The provision of Data for the purposes of the service is mandatory and failure to provide it will prevent you from browsing the Site or from registering and participating in the Events. The provision of Data for the purposes of communication is optional and failure to provide it will prevent the Data Controllers from processing your Personal Data to send you updates or commercial communications.

6. Access to Data

Your data may be made accessible for the aforementioned purposes to:

- employees and / or collaborators of each Data Controller or Joint Controller, in their capacity as persons in charge of the processing and / or internal data processors and / or system administrators;
- third parties (for example, credit institutions, professional firms, etc.) who carry out outsourcing activities on behalf of each Data Controller or Joint Controller, in their capacity as external data processors.

7. Data communication

Your Data may be disclosed, even without your consent, to supervisory bodies, law enforcement agencies, the judiciary and competent authorities, upon their express request which will process them as independent data controllers for institutional purposes and / or pursuant to law in the course of investigations and checks. Your data may also be disclosed to third parties (for example, partners, freelancers, etc.), as independent data controllers, for the performance of activities instrumental to the aforementioned purposes.

8. Data Transfer

The Data are not disseminated but can be transferred for the above purposes to non-EU countries. The Data Controllers may transfer Data outside the European Union. For this purposes, according to Data Protection Laws, the Data Controllers assess the impact of data transfers and adopt, where applicable, the most appropriate safeguards (for example, adequacy decisions or standard contractual clauses).

9. Rights of the interested party

The Data Controllers inform you that, as an interested party, if the limitations provided for by law do not apply, you have the right to:

- obtain from each Data Controller or Joint Controller confirmation of the existence or otherwise of your personal data, even if not yet registered, and that such data are made available to you in an intelligible form;
- obtain from each Data Controller or Joint Controller an indication and, if applicable, a copy of: a) the origin and category of personal data; b) the logic applied in case of processing carried out with the aid of electronic tools; c) the purposes and methods of the processing; d) the identity of the data

controller and processors; e) the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them, in particular if they are recipients of third countries or international organizations; f) when possible, of the data retention period or the criteria used to determine this period; g) the existence of an automated decision-making process, and in this case the logic used, the importance and consequences envisaged for the data subject; h) the existence of adequate guarantees in the event of data transfer to a non-EU country or to an international organization;

obtain from each Data Controller or Joint Controller, without undue delay, the updating and correction of inaccurate data or, when interested, the integration of incomplete data;

- revoke at any time, easily, without hindrance, the consents given, using, if possible, the same channels used to provide them;

- obtain from each Data Controller or Joint Controller the deletion, transformation into anonymous form or blocking of data: a) unlawfully processed; b) no longer necessary in relation to the purposes for which they were collected or subsequently processed; c) in case of revocation of the consent on which the processing is based and in case there is no other legal basis, d) if you have opposed the processing and there is no legitimate overriding reason to continue the processing; e) in case of fulfillment of a legal obligation; f) in the case of data referring to minors. The Data Controller may refuse deletion only in the case of: a) exercise of the right to freedom of expression and information; b) fulfillment of a legal obligation, performance of a task carried out in the public interest or exercise of public authority;

- c) reasons of public health interest; d) archiving in the public interest, scientific or historical research or for statistical purposes; e) exercise of a right in court;

- obtain from each Data Controller or Joint Controller the restriction of the processing in the case of: a) dispute

the accuracy of personal data; b) unlawful processing by the Data Controller to prevent its deletion;

- c) exercise of your right in court; d) assessment of the possible prevalence of the legitimate reasons of the Data Controller with respect to those of the data subject;

- receive from each Data Controller or Joint Controller, if the processing is carried out by automatic means, without impediments and in a structured, commonly used and readable format, the personal data concerning you to transmit them to another controller or - if technically feasible - to obtain the direct transmission by the Data Controller to another data controller;

- object, in whole or in part: a) for legitimate reasons, connected to your particular situation, to the processing of your personal data; b) to the processing of personal data concerning you for the purpose of sending communication material, by email and / or by traditional methods by telephone and / or paper mail;

- lodge a complaint with the Data Protection Authority.

In the cases mentioned above, where necessary, each Data Controller or Joint Controller will inform the third parties to whom your personal data are communicated of the possible exercise of rights by you, with the exception of specific cases (eg when this fulfillment is impossible or involves the use of means clearly disproportionate to the protected right).

10. Methods of exercising rights

You may at any time exercise these rights towards

- Consulnet Italia S.r.l. by sending a registered letter a.r. to the address of the Data Controller, by sending an email to

m.mazzucchelli@consulnet.it or by calling +39 02 89011933;

- Rödl & Partner Professional Association by sending a registered letter a.r. to the address of the Data Controller,

by sending an email to dpo@roedl.com or by calling +39 02 6328841.

11. Data Controller and Data Protection Officer

The data controllers are:

- Consulnet Italia S.r.l., which can be contacted by sending an email to m.mazzucchelli@consulnet.it or by calling +39 02 89011933;

- Rödl & Partner Associazione Professionale, may be contacted by sending a registered mail with return receipt or an email to dpo@roedl.com or by calling +39 02 6328841.
- The updated list of data processors is kept at the headquarters of each Data Controller.

Consulnet Italia S.r.l.

Rödl & Partner Associazione Professionale