RGS S.R.L.

Via Zamenhof, 397

36100 Vicenza

+39 0444 239294

www.rgs-vicenza.com

PRIVACY POLICY REGARDING THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of Legislative Decree no. 196 of June 30, 2003 (hereinafter, the "Privacy Code"), as amended by Legislative Decree 101/2018, and Article 13 of EU Regulation 2016/679 (hereinafter, the "GDPR"), we inform you that the processing of your personal data will be based on the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimization, accuracy, integrity, and confidentiality. Consequently, your personal data will be processed in accordance with the provisions of the applicable legislation and the confidentiality obligations set forth therein.

1. Data Controller

The Data Controller for your personal data is RGS srl, in the person of its Legal Representative pro tempore, with its registered office in Vicenza, Via L. L. Zamenhof no. 397, Tax Code and VAT number 04124240245 (hereinafter, the "Data Controller").

2. Purpose of the processing

Your personal data are processed exclusively for the purpose of concluding and executing our contractual relationships, for fulfilling administrative, tax, and accounting obligations arising from our relationship with you, and for complying with obligations set forth by applicable laws and regulations.

3. Methods of processing

The processing of your personal data is carried out by means of the operations indicated in Art. 4 of the Privacy Code and Art. 4, point 2) of the GDPR: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure, and destruction of data.

Your personal data are subject to both paper-based and electronic and/or automated processing.

4. Data retention

Your personal data will be retained for the minimum period required by tax regulations and, in any event, for the duration of the ordinary statute of limitations applicable to any legal claims arising from your relationship with our company.

5. Data disclosure

Personal data may be disclosed to our employees—who are formally authorized to process such data and have received appropriate training on data security—within the scope of their respective duties and responsibilities. Furthermore, data may be disclosed to public or private entities when such disclosure is necessary for the proper fulfillment of the purposes set out in point 2, or for compliance with legal obligations. Data may also be shared with external parties (such as banks or insurance companies) and external consultants who provide support to us, in their capacity as external data processors.

In no case will the data be disseminated or used for profiling purposes.

6. Data transfer

Personal data are stored on servers located in Vicenza (VI), within the European Union. Data Controller reserves the right to move the servers outside the EU, should the need arise. In such an event, the Data Controller guarantees that any transfer of data outside the EU will take place in compliance with applicable legal provisions, subject to the execution of standard contractual clauses as provided by the European Commission.

7. Nature of the provision of data and consequences of a refusal to respond

In order to ensure the proper delivery of the services requested from us and to enable us to fulfill the associated contractual and legal obligations, the provision of the requested data is essential. Consequently, any refusal to provide such data, or a failure to consent to its subsequent processing, may render it impossible—either wholly or in part—for us to provide the requested services or to comply with our legal obligations.

8. Rights of the interested party

As a interested party, you may exercise the following rights at any time:

a) to request confirmation as to whether or not your personal data are being processed, and to obtain access to such data and information regarding the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be disclosed, and, where possible, the storage period (Art. 15, paragraph 1, letters a), b), c), and d) of the GDPR);
b) to request and obtain the rectification or erasure of your data (Arts. 16 and 17 of the GDPR);
c) to request and obtain the restriction of processing (Art. 18 of the GDPR);
d) to request and obtain—in the case of data processed by automated means—data portability; that is, to receive your data from the data controller in a structured, commonly used, and machine-readable format, and to transmit those data to another data controller without hindrance (Art. 20 of the GDPR);

e) to object to the processing at any time (Art. 21 of the GDPR);
f) to withdraw your consent at any time, without affecting the lawfulness of processing based on consent given before such withdrawal (Art. 7, paragraph 3, of the GDPR);
g) to lodge a complaint with the Data Protection Authority (Art. 51 of the GDPR).

You may exercise your rights at any time by sending:

- A registered letter to RGS srl, at the address indicated in point 1, or

- An e-mail to the address privacy@rgs-vicenza.com

Vicenza, 14/01/2025

Stefano Bedin

Legal Representative