

The company SEFIN S.p.a., in accordance with personal data protection regulations, is the Data Controller for the information you have provided. Below are detailed guidelines regarding their use and protection.

Purposes and Legal Basis

Your data will be processed in accordance with Article 6, paragraph 1, letters b) and c) of Regulation EU 2016/679 for the following purposes:

1. Registration on the website for access to dedicated content;
2. Execution and management of the service;
3. Execution of all activities related to the contract, including administrative, accounting, and/or tax-related tasks;
4. Fulfillment of specific legal obligations, regulations, and/or orders from authorities related to the contract;
5. Exercise of the Data Controller's rights in judicial disputes.

For the purposes mentioned above, no consent is required. However, consent will be requested separately, in accordance with Article 6, paragraph 1, letter a) of the Regulation for:

6. Direct marketing activities, including sending email communications regarding updates or commercial offers on the products and services offered by the Data Controller.

For your protection, it is noted that the data requested are only those strictly necessary for the fulfillment of the purposes outlined above, in accordance with the principle of data minimization set out in Article 5, paragraph 1, letter c), and that failure to provide such data may result in the impossibility of completing the agreed tasks.

Data Being Processed

The data requested from you and subject to processing for the purposes outlined above may include:

- Identification data: (name and surname, company role);
- Contact data: (email address, certified email address (PEC), landline, mobile phone);
- Access data (username and initial password).

Processing Methods

Processing will be carried out both manually and electronically, in compliance with the provisions of Article 32 of Regulation EU 2016/679, by the Data Controller or by specifically appointed and authorized personnel.

The updated list of external Data Processors is kept at the legal headquarters of the Data Controller.

In accordance with Article 4, paragraph 2, processing may involve any operation or set of operations such as collection, recording, storage, adaptation, modification, extraction, consultation, communication, restriction, deletion, or destruction.

Retention Period

The Data Controller will retain your data for the entire period necessary to fulfill the service and for 10 years after the conclusion of the relationship.

For the purpose outlined in point 6, the Data Controller will retain and process your contact

details for no more than 2 years from the date of consent for the specific processing, unless consent is withdrawn earlier.

Data Communication

In order to fulfill the purposes mentioned above and in accordance with the previous paragraph, we may share your data with: banks and credit institutions; insurance companies; public entities and administrative bodies; supervisory bodies; judicial authorities; other partner companies; and all entities to which communication is required by law to fulfill the specified purposes.

These entities will process your data as independent data controllers.

Your Rights and How to Exercise Them

As a data subject, you are entitled to the rights outlined in Articles 15 to 22 of Regulation EU 2016/679, where applicable, which include:

- Accessing your data held by the Data Controller;
- Requesting rectification, deletion, or limitation of processing;
- Objecting to the processing of personal data;
- Receiving your personal data in a structured, commonly used, and machine-readable format, and having the right to transmit this data to another Data Controller (data portability);
- Lodging a complaint with a supervisory authority.

You may exercise these rights at any time by sending written communication to SEFIN S.p.a., Data Controller, at their registered office in Milan (MI), Viale Zara 10, via email at privacy@sefin.it, or via certified email at sam.sefin@legalmail.it.

SEFIN S.p.a. has also appointed a Data Protection Officer (DPO) who can be contacted for data protection matters at dpo@frareg.com.