

Dear User,

Pursuant to Article 13 of EU Regulation No. 679/2016 (hereinafter, "GDPR"), we inform you that the processing of the data you provided will be carried out with the methods and procedures to ensure that the processing of personal data is in compliance with the fundamental rights and freedoms, as well as the dignity of the data party, with particular reference to confidentiality, security, personal identity, and the right to data protection.

Regarding the purposes or finality, the personal data and any changes that you may communicate to us in the future are collected and processed for the following and exclusive purpose: sending promotional and informational material via newsletter.

To fulfill this stated purpose, the data processed by the Company are collected directly from the interested party and pertains to:

- personal data (first and last name);
- identification data (email address).

The legal basis identified for this purpose lies in your express and unequivocal consent (under Article 6.1, letter A) of the GDPR).

For your protection, we specify that the data requested from you are only those strictly necessary for the fulfillment of these purposes, in compliance with the principle of data minimization as referred to in Article 5, paragraph 1, letter c).

As for the processing methods, we inform you that the processing of your data may be handled out both manually and electronically, in compliance with the provisions of Article 32 of EU Regulation 2016/679, by the Data Controller or by persons specifically appointed and authorized by that individual.

The updated list of appointees and external entities designated as Data Processors is kept at the Data Controller's office and will be made available to you immediately upon your express request.

Pursuant to Article 4, paragraph 2 of the Regulation, it is specified that processing may consist of any operation or set of operations, such as the collection, recording, storage, adaptation and modification, extraction, consultation, communication, restriction, cancellation, or destruction.

The Data Controller will retain your personal data for the time necessary to fulfill the above purposes and, in any case, for no longer than two years from their collection, subject to early revocation of consent or renewal for an additional 24 months.

The personal data collected for the aforementioned purposes may be subject to simple communication, within the scope of their specific competence, to employees/collaborators in their capacity as authorized personnel to process data, after appropriate designation; to third parties, identified as Data Processors by the Data Controller. Your data will not be disclosed to unauthorized third parties.

To this end, processing is conducted using appropriate security measures to prevent unauthorized access to the data by third parties and to ensure confidentiality.

Pursuant to EU Regulation 2016/679, Chapter III:

1. The interested party has the right to obtain confirmation as to whether or not personal data concerning them exist, even if not yet recorded, and to have such data communicated in an intelligible form.
2. The interested party has the right to obtain information on: the source of the personal data; the purposes and methods of processing; the logic applied if the processing is carried out with the aid of electronic instruments or devices; the identification details of the data controller, data processors, and representative; the individuals or categories of individuals to whom the personal data may be communicated or who may become aware of it in their capacity as designated representative in the state, as data processors or appointees.
3. The interested party has the right to obtain:
  - a. the updating, rectification, or, where interested, the integration of data;

b. the cancellation, anonymization, or blocking of data processed unlawfully, including data that do not need to be retained for the purposes for which the data were collected or subsequently processed;

c. certification that the operations referred to in letters a) and b) have been notified, including their content, of those to whom the data have been communicated or disseminated, except in the case in which such fulfillment proves impossible or involves the use of means manifestly disproportionate to the right that is to be protected;;

d. a copy of the information in our possession in a common and interoperable format;

e. the limitation of the processing of personal data concerning them or to object, in whole or in part, for legitimate reasons to the processing of personal data concerning them, even if relevant to the purpose of the data collection.

Furthermore, the interested party has the right to:

f. withdraw consent at any time, without prejudice to the lawfulness of processing based on consent before its withdrawal;

g. lodge a complaint with a Supervisory Authority.

At any time, you may exercise these rights by sending a written communication to SEFIN S.p.A., Viale Zara 10 - Milan (MI), or by email to [privacy@sefin.it](mailto:privacy@sefin.it), or to the certified email address [sam.sefin@legalmail.it](mailto:sam.sefin@legalmail.it).

SEFIN S.p.A. has also appointed a Data Protection Officer (DPO) who can be contacted for any needs in this regard, at [dpo@frareg.com](mailto:dpo@frareg.com).