

ITSRIGHT

Information on personal data protection

Itsright wish to inform you about how we process the personal data that you may provide us with for the conferment and in the execution of the mandate contract, in compliance with the provisions of EU Regulation 2016/679 and applicable national laws.

Personal Data Controller is Itsright S.r.l. ("Controller" o "Itsright"), with its registered office at Verziere 2, 20122 Milan (Italy), VAT Number 07083740964, Tel. +39 02.66668900, Fax. +39 02.66668915.

What kind of data we process and how?

On the occasion of the conferment of the mandate contract and in its execution, Itsright process these following data:

- Personal data (name and surname, place and date of birth, sex, citizenship, nickname) and contact detail (address of residence and/or domicile, mail address, PEC, telephone), included your social networks contacts' profile (nickname)
- biometric data (image of faces and/or other data) if included in any identity documents
- Bank data (bank details and similar information for payment) and tax-related data (fiscal code, VAT number, Country of tax residence and applicable tax regime)
- Personal data related to civil/criminal judicial proceedings in which you may be involved (by way of example, executive orders, successions, payment delegation towards third parties)
- Data related to any remunerations and payments due to you by virtue of the mandate contract.

We wish to inform you that your personal data are processed both in paper and in electronic form, in compliance with the guarantees and the principles provided by the applicable laws.

Nature of conferment of your personal data

In order to sign and correctly execute the mandate, the conferment of your personal data is necessary. Therefore, the consequence of the lack of or incorrect or partial conferment of such personal data is the impossibility to sign the mandate contract and/or to execute it.

Purposes and legal basis of the processing

Itsright process your personal data for the following purposes: (i) to sign agreements for the services rendered by the Controller; (ii) to comply with pre-contractual, contractual and legal obligations – included tax-related ones - deriving from the contractual relationship with you; (iii) to promote the activity of the Controller, to you and/or third parties, by way of communications on the commercial initiatives and the services rendered by the Controller similar to those services performed by ITSRIGHT in the execution of the mandate contract; (iv) to publish your name and surname on ITSRIGHT official website (www.itsright.it) in the section "*Performers/Who is with us*" as well as in the official list of ITSRIGHT's performers; (v) to exercise the Controller's rights, including right to judicial protection; (vi) to comply with any other legal obligations laid down by law, national and or EU – including the obligations related to publicity and transparency on the individuals who have conferred mandate on Itsright – as well as to comply with orders issued by a public authority.

The legal basis of the above-mentioned processing is: art. 6, par. 1 lett. b) EU Reg. 2016/679 (performance of a contract or precontractual measures) for the purposes under letters (i) and (ii); art. 6, par. 1 lett. c) EU Reg. 2016/679 (compliance with a legal obligation) for the purpose under letter (vi) and, with regard to the inclusion in the official performers' list, for the purpose under letter (iv); art. 6, par. 1 lett. f) (Itsright' legitimate interest) for the purposes under letters (iii), (iv) and (v).

Duration

Your personal data are processed for no longer than the time necessary and related to the performance of the mandate and in any event no later than 10 years after termination of the relationship for the purposes under letters (i) e (ii), no later than 2 months after termination of the relationship for the purpose under letter (iii) and according to the limits provided for by specific legal obligations – including tax-related ones – for any other purpose.

Sharing and disclosure of personal data

The Controller may share your personal data with the following subjects: Itsright' staff, including collaborators, in charge of personal data processing; companies, societies and entities in general (*collecting societies*), Italian or foreign, in charge – on a collective and/or individual basis – of managing neighbouring rights and collecting money due to Itsright' mandators, in their capacity of data processors or independent data controllers; third-party companies or other individuals carrying out outsourced services – like IT, administrative, accounting services - on behalf of the Controller in their capacity of data processors or independent data controllers; any other individual to whom the disclosure of personal data is mandatory or allowed by law, supervisory bodies or judicial authorities; auditors and insurance companies for the relevant services; banks and similar financial institutions for payment purposes.

Personal data transfer

In order to offer its services, Itsright may transfer your personal data to third parties located in countries which are non-EU members. In any event, Itsright shall ensure that such transfer is carried out in accordance with the safeguards provided for by national and EU law (standard contractual clauses or adequacy decisions).

Rights of the data subject and procedures to exercise them

In compliance with articles 15-22 GDPR, at any time you may exercise the following rights, by sending an email to the email address dpo@Itsright.it:

- right to access to your personal data;
- rectification and completion of inexact or incomplete personal data;
- erasure of personal data conserved by the Controller;
- restriction of processing only to certain personal data;
- personal data portability;
- right to object in whole or in part to the processing of your personal data; in particular, you may object for the purposes mentioned under point (iii) above; in such event, the Controller shall cease to process your personal data for that purpose within 30 days from the receipt of your request; you may also object only partially to the processing for the mentioned point (iii) purpose, i.e. in respect of a single means of communication (mail, email, telephone).
- safeguard of human intervention by the Controller, should you be subject to a decision based solely on automated processing, including profiling;
- right to lodge a complaint to the competent authority for personal data protection - Garante per la protezione dei dati personali (Piazza Venezia n. 11, 00187 Roma; tel. 06.696771; fax 06.69677.3785; mail protocollo@gpdp.it).

Data Protection Officer

The Data Protection Officer is Mr. Fernando Mantovani, (dpo@Itsright.it; tel. +39 02.66668900).

Modifications and amendments

The Controller may amend or update its content at any time. Should the occurred amendments lead to substantial modifications in the processing, you will be adequately notified by the Controller; an up-to-date version of this Information on personal data processing shall always be available at www.Itsright.it.