## INFORMATION RELATING TO THE PROCESSING OF PERSONAL DATA

Customers (actual and requesting offers) - Vers. 12/08/2021

**Degen SRL** processes your data in compliance with EU Regulation 2016/679 on the protection of personal data ("GDPR") and other regulations applicable. Please read the following information carefully. In the text that follows the word "data subject" refers to you. The data controller is at your disposal for any clarification.

Origin of the data - data subject

**Data subjects -** customers natural persons, potential customers natural persons who request the elaboration of an offer or project

**Types of data processed -** personal identification data, contact data, tax identification data, bank data, data relating to services subject of the contract, payment and collection data, data relating to the internal organization useful for the elaboration and execution of projects

**Purposes** - to prepare offers and projects at the request of the customer, to prepare commercial contracts, to execute commercial contracts, to collect payments (also in case of of litigation), manage and store accounting documents in accordance with the law, fulfill all legal obligations

**Data Controller -** Degen SRL Via Copernico 38 - 20125 Milan privacy@degenagency.com

Data Protection Officer (DPO) - not appointed

Representative in the EU - not appointed

**Legitimacy of processing -** art. 6 § 1 letter b) GDPR (need to execute a contract or pre-contractual measures) art. 6 § 1 letter c) GDPR (need to fulfill a legal obligation)

Legitimate interest - the processing is not based on a legitimate interest

**Data retention** - for the entire duration of the commercial relationship and 10 years furtherly (equal to the conservation obligation of the accounting records required by law). Only in the case of customers who, having received the offer, do not assign the job to the owner, the data are kept for 1 year from the date of sending the offer (without prejudice to the right of the data subject to request early cancellation)

**Possible recipients of data -** cloud service providers, email service providers, website hosting service providers, virtual support providers (chatbots), virtual data collection service providers (online questionnaires), management program of sales providers (CRM), external professionals who collaborate in the implementation of projects

**Extra-EU data transfer** - data transfer to the following countries is possible: various (depending on the physical location of external professionals) on the basis of standard contractual clauses for the protection of data (Article 46 GDPR)

**Your rights** - your rights (available at the link below) can be exercised by contacting the controller, the representative or the DPO by post or by email <a href="https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights/what-are-my-rights">https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights/what-are-my-rights</a> en

**Complaints** - for any violation of your rights you can make a complaint to the Garante per la Protezione dei Dati Personali in Rome or, alternatively, to the supervisory authority of the place where you have establishment within the EU.

**Data communication -** necessary: any lack in communicating data prevents from establishing the commercial relationship and / or elaborating the project / offer

Consent - not required