

# INFORMATION RELATING TO THE PROCESSING OF PERSONAL DATA

Shareholders, employees and members of board - 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 applicable regulations. 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 data** - data subject

**Data subjects** - shareholders of the company, members of the board and directors of the company, continuous collaborators of the company, however named (including employees)

**Types of data processed** - personal identification data, contact data, tax identification data, C.V. data, data relating to the family status, data relating to remuneration and financial or fiscal status, social security data, bank data, health data, data relating to the performance of work activities, data relating to debt situations

**Purposes** - to give execution to the relationship with collaborators and administrators, to give execution of the related legal obligations (e.g. social security, safety and health), pay wages and emoluments, organize company activities, keep company books and records (for shareholders and members of the board), protect the interests of the controller and data subject in judicial and extrajudicial matters

**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) art. 9 § 2 lett. b) GDPR (fulfillment of obligations relating to labor law and social security)

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

**Data retention** - for the entire duration of the relationship and subsequently until the legal obligation persists and / or until the term within which the processor or the data subject can exercise their rights

**Possible recipients of data** - public bodies, accountants, tax consultants, labor consultants, cloud service providers, email service providers, suppliers of programs for project management, 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 data protection clauses (Article 46 of the GDPR)

**Your rights** - your rights (available at link below) can be exercised by contacting the processor, the representative or the DPO by post or by email

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights/what-are-my-rights\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights/what-are-my-rights_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 an establishment, within the EU

**Communication of data** - necessary: any lack in communicating data may prevent from establishing the relationship of collaborator, shareholder or member of the board between the controller and the data subject

**Consent** - not required