

PRIVACY POLICY suppliers and customers ex art. 13 of EU Regulation 679/2016 and the applicable privacy provisions

Foreword

Pursuant to and for the purposes of EU Regulation 679/2016 on the protection of personal data ("**Regulation**") and any other provision and/or legislation, national and/or Community, applicable to the protection of personal data, ARTNETWORTH S.R.L. with registered office 20144 – MILAN (MI), Via Tortona 4, Data Controller ("**Company**" or "**Data Controller**"), informs you that the personal data provided by you during the establishment and/or execution of the contractual relationship or otherwise acquired as part of the activity of our Company, may be processed in accordance with the following.

1. Purpose of processing and legal basis for processing

The Controller collects and processes personal data referring to you in the context of the existing contractual relationship with the Company. This is information relating to personal details, contact details, bank details, company contact details etc., ("Data". Below we explain the purposes for which the Data are processed, as well as the legal basis that legitimizes their processing.



The Company processes the Data for:

(i) the selection and subsequent execution of the contractual relationship with our Company;

(ii) the drafting, discussion and communication of the contractual proposal;

(iii) management and execution of administrative, accounting, tax obligations arising from the established contractual relationship;

The legal basis for the processing of Data for the pursuit of said purposes is the execution and proper management of the contractual relationship established and/or entered into. The processing of the Data is necessary and failure to provide them will result in the impossibility of executing the contractual relationship being established and/or entered into.

(iv) Litigation management in case of defaults, disputes, litigation and/or settlements.

The legal basis for the processing of Data for the purposes illustrated is the pursuit of a legitimate interest of the Company and/or third parties (e.g. in case of litigation), which, by virtue of the evaluations carried out by the Company, does not appear to be detrimental to your rights.

(v) Purposes related to the fulfillment of legal obligations, regulations, national and community norms as well as provisions issued by authorities legitimized to do so by law.

The legal basis for the processing of the Data processed for this purpose is the fulfillment of obligations under the law and applicable regulations. The processing of Data is necessary and failure to provide it will make it impossible for the Company to comply with its legal obligations.

(vi) purposes related to the performance of promotional and commercial activities related to products and services offered by the Company.

The legal basis of the Data processed for this purpose is the consent expressed by the interested party, which may be revoked at any time, interrupting the performance of said activity, without, however, the intervening revocation being prejudicial to the operations carried out up to that moment.

(vii) purposes related to sending exclusively promotional and commercial e-mail communication regarding products and services similar to those already sold by the Company to the data subject.



The legal basis for the Data processed for these purposes is the legitimate interest of the Company in the communication of promotional e-mails, based on what is allowed by Article 130 of the Privacy Code. At any time, through "unsubscribe" mechanism at the bottom of the communications, the data subject may object to the processing in question.

2. Categories of individuals to whom the data may be disclosed

The Data will not be disclosed and may be communicated, for the above purposes, to the following categories of subjects: (i) persons, companies, associations or professional firms that provide services or assistance and consultancy activities or supply services/products to our Company, including but not limited to information technology, technical, accounting, administrative, legal, tax and financial matters; (ii) banking institutions for the disbursement of fees and insurance companies; (iii) subjects whose right to access the Data is recognized by provisions of law and secondary regulations or by provisions issued by authorities legitimized to do so by law. The subjects belonging to the above categories will use the Data as autonomous data controllers or as Data Processors. The Data will not be transferred outside the European Economic Area.

The Data, may also be will be brought to the attention of our personnel who will process them in their capacity as Data Processors.

3. Data Retention Criteria

The Data will be processed for the duration of the contractual relationship with our Company, after which it will be retained in compliance with the ordinary limitation periods identified by the Civil Code or specific legal provisions, for administrative purposes and/or to assert or defend a right a right or legitimate interest, and the same will be deleted when the purposes for which it was collected cease to exist. Contact data processed to conduct promotional activities (purpose vi)), will be processed for two years from the date consent was given, unless revoked. This period may be extended by the data subject by renewing consent to the processing for that purpose



4. Rights of interested parties

We inform you that you may exercise, in the cases expressly provided for in the Regulations, the rights set forth in Articles 15 et seq. of the Regulations and in particular:

(i) request confirmation that the processing of the Data is taking place and, in this case, ask the Data Controller for access to the information relating to such processing;

(ii) request rectification of inaccurate or incomplete Data;

(iii) request from the Data Controller the deletion of the Data;

(iv) request the restriction of the processing;

(v) request to receive, in a commonly used and machine-readable format, the Data concerning you or to obtain direct transmission to another data controller, where technically feasible (so-called "data portability").

You also have the right to object in whole or in part, for legitimate reasons, to the processing of Data concerning you.

The exercise of the aforementioned rights can be done by sending a request to the Company at the e-mail address <u>privacy@digitag.me</u>

Finally, if you believe that the processing of the Data provided violates the legislation on the protection of personal data, you have the right to lodge a complaint with the Data Protection Authority (<u>www.garanteprivacy.it</u>).

The Holder shall do so without delay and, in any case, no later than one month after receipt of the request. The deadline may be extended by two months if necessary, taking into account the complexity and number of requests received by the Controller. In such cases, the Controller will, within one month of receipt of your request, inform you and make you aware of the reasons for the extension.

Exercise of the above rights can be done by sending a request to the e-mail address <u>privacy@digitag.me</u>.

The Company reminds you that, where the response to your requests has not been satisfactory in your opinion, you may address and file a complaint with the Personal Data Protection Authority (<u>http://www.garanteprivacy.it/</u>) in the manner provided for in the Regulations and in the operating procedures set forth in the reported site.





5. Update of the disclosure.

This policy was updated in March 2023.

The Data Controller Artnetworth S.r.l.

Consent collection form to receive commercial and promotional communications from the Company

The undersigned	(in his or her own right and/or
as a representative of the company with which we have a con	tractual relationship) wishes to
receive commercial and promotional communications (via e-ma	il, text message, telephone and
other digital means) about Artnetworth's products and services	in accordance with the privacy
policy to which this form refers.	

Consent soon

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I do not lend consent \bigcirc

Place and date Signature