## INFORMATION REQUIREMENTS IN ACCORDANCE WITH ART. 13 REGULATION (UE) 2016/679

# - NEWSLETTER -

The purpose of this document is to inform you, in accordance with art. 13 of Regulation (EU) 2016/679 (hereinafter "GDPR") about how we process your personal data provided by filling out this online form on this website.

## **Controller**

The Data Controller is CVing S.r.l. (VAT number 04681350270), with registered office in 20139 Milano (MI) - via Tortona 33, 20144, that can be contacted at *privacy@cving.com* 

#### Data Protection Officer (D.P.O.)

CVing has appointed a Data Protection Officer (DPO), who you can contact by writing to <a href="mailto:dpo@cving.com">dpo@cving.com</a>

## Purposes and legal basis of data processing

We inform you that your personal data will be processed to provide you with updates on CVing initiatives; this is a promotional activity, carried out by sending e-mail communications (e.g. newsletters).

The legal basis for the processing is your consent (art. 6 par.1 lett. a) GDPR), expressed by filling out the form and through the voluntary ticking of the corresponding checkbox.

#### Nature of data conferment

The provision of the data requested and marked with an asterisk (\*) (name, surname, e-mail) is mandatory; failure to provide such data will make it impossible for CVing to send you the promotional communications covered by this policy.

The provision of data not marked with an asterisk is optional, and not providing such data does not prevent you from receiving the newsletter.

## Personal data retention period

We will retain your personal data for as long as you are interested in receiving updates about CVing's initiatives; you may withdraw your consent to receive such updates at any time by clicking "Unsubscribe" at the bottom of any email.

Anyway, CVing will delete your information 24 months after your subscription to the service or from the date of the last interaction between you and CVing, whichever is the later.

#### Categories of recipients of personal data

Your personal data may be disclosed to third parties that will act as data controller, including Vodafone Italia Spa, only with your express consent by checking the relevant checkbox.

However, these data also may be accessed by third parties (e.g. IT service providers, communication agencies, consultants, administrative and judicial authorities): where they can't be considered data controllers, they will be duly designated as data processors according to art. 28 GDPR. CVing, after verifying that the third party presents adequate measures for processing, will provide the latter with precise instructions for the processing of personal data and will supervise its actions. Your personal data will not be disseminated.

#### Extra-EU data transfer

CVing mainly processes data within the European Union and/or the European Economic Area. Where strictly necessary, CVing may transfer personal data to third countries; in that case, CVing ensures that the transfer and processing of personal data takes place in accordance with the conditions imposed by EU Reg. 2016/679 (art. 44 et seq.), such as Commission adequacy decisions, standard contractual clauses or other measures considered appropriate.

Rights of the data subject

At any time, pursuant to art. 15-22 of the GDPR, you may exercise, by writing to <u>privacy@cving.com</u>, the right to:

1. ask for confirmation of the existence of your personal data;

2. obtain information on the purposes of the processing, the categories of personal data, recipients or categories of recipients to whom the personal data have been or will be communicated and, where possible, the retention period;

3. obtain the rectification and erasure of data;

4. obtain restriction of processing concerning the data subject or to object to processing; 5. receive your personal data in a structured, commonly used and machine-readable format and to request the transmission of those data to another controller without hindrance from the controller to which the personal data have been provided;

6. where personal data are processed for direct marketing purpose, object at any time to processing of personal data for such marketing;

7. withdraw consent at any time;

8. object to be subject to a decision based solely on automated processing, including profiling.

You may also lodge a complaint with a supervisory authority (Garante per la Protezione dei Dati, or other competent authority).

This Privacy Policy is effective as of 22/02/2022.

CVing S.r.l. reserves the right to partially or fully modify this Privacy Policy or change its content. In the event of any conflict between the provisions of the Italian language version and the provisions of the English language version of this document, the provisions of the Italian language version shall prevail.

Any updates will be published on this website.