



PRIVACY POLICY IN ACCORDANCE WITH ARTICLE 13 OF REGULATION (EU) 2016/679 OF 27 APRIL 2016 ON THE PROTECTION OF NATURAL PERSONS WITH REGARD TO THE PROCESSING OF PERSONAL DATA AND ON THE FREE MOVEMENT OF SUCH DATA.

Dear Sir/Madam,

the applicable regulation for the processing of personal data, defined in compliance with Regulation EU 2016/679 of 27 April 2016 (hereinafter GDPR), includes provisions aimed at guaranteeing the processing of personal data and sensitive data – as defined in article 9 of the GDPR, hereinafter referred to as "Data" – and the fundamental rights of natural persons with regard to the protection of their data.

In accordance with the GDPR, we provide the following simplified Informative Note, which explains how your personal data is collected and processes.

1. Purpose of Data Processing

In compliance with the applicable regulations, article 13 of the GDPR, we inform you that BLS Srl, Via dei Giovi, 41 - Cormano (MI), Italy, the Data Controller, processes your personal data in a legitimate, appropriate and transparent manner, directly or via third parties appointed to carry out such duties, strictly for business management purposes, in compliance with the obligations set by laws, internal rules and EC regulations.

In particular, personal data are processed as part of the Data Controller's normal activities, for the following purposes:

1. to fully and correctly execute contractual obligations (hereinafter, collectively, the "contractual relationship");
2. to comply with administrative and accounting obligations pertaining to the contractual relationship;
3. to comply with specific obligations set by laws, rules or EC regulations (for example, anti-money-laundering regulations, regulations and decisions issued by Supervisory Bodies);
4. to keep the data subject updated on promotional and commercial initiatives, by sending advertising and/or promotional material via email ("newsletters").

2. Processing Methods and Data Retention Period

Data is processed with or without the use of electronic methods, following organisation procedures and logic strictly relevant to the obligations, duties and purposes of the processing;

Your Data will be retained only for the time necessary to achieve the purposes for which they have been collected; in particular, the data retention period will be based on the nature and duration of the contractual relationship and on the protection of the counterpart's interests.



The data necessary to send Newsletters will be processed following the "opt-out" model, therefore, until the data subject explicitly decides not to continue receiving messages and exercises the right to be cancelled from the mailing list.

In any case, the Data Controller will take all measures to prevent data from being used indefinitely, by checking regularly and adequately that the data subject's interest persists.

3. Data Provision and Consequences of Refusal

All Data collected directly or via third parties as described in this policy will be used for the purposes mentioned, therefore, the total or partial refusal to provide the data or consent to the data processing, will result in the impossibility to carry out the activities and provide the services requested.

Additionally, you may provide your consent to processing your Data for the following purposes:

- organisation of events, meetings, conferences and seminars, including for professional training purposes;
- marketing activities, including the promotion of professional services, distribution of informative material, sending newsletters and publications.

4. Subjects Authorised to Process Your Data – Data Communication and Diffusion

Collected Data is processed by specifically nominated personnel (employees and collaborators of the Data Controller) who require such data to carry out their duties, and by external subjects who, depending on the case, may act as Data Controllers and Data Processors.

Professionals who collaborate with BLS Srl and its personnel will have access to your personal data and any general information provided by you.

Data may also be communicated, within the limits relevant to the obligations, duties and purposes described above as well as for management/administrative obligations, to the Inland Revenue Agency, Insurance Institutions and Judicial Bodies in relation to the obligations, duties and purposes mentioned above.

The Data Controller commits to making sure that your Data is not diffused for purposes other than those mentioned above.

5. Data Controller and Data Processors

The Data Controller is BLS Srl, Via dei Giovi, 41 – Cormano (MI), Italy, tel. 02 39310212. No internal manager has been specifically nominated to deal with these matters.

For information and assistance, please contact directly the Data Controller in writing, by post at the company headquarters, or via email, at privacy@blsgroup.it.

6. Data Subject Rights

The EU Regulation (chapter III, Section I) establishes the Data Subject rights, including:

Right to access - The right to obtain confirmation as to whether or not personal data concerning them is being processed, and if the case, have access to other information, including: purpose of



data processing, categories of data processed, data retention period, who their data may be communicated to (article 15, GDPR);

Right to rectify - The right to obtain, without unjustified delay, the amendment of incorrect personal data concerning them and the integration of any incomplete data (article 16, GDPR);

Right to delete - The right to obtain, without unjustified delay, the deletion of incorrect personal data concerning them in the cases described in the GDPR (article 17, GDPR);

Right to limit - The right to limit the processing, in the cases described by the GDPR (article 18, GDPR);

Right to portability - The right to obtain the personal data concerning them in a structured format, easily readable by an automated device, and to transfer the data to another Data Controller in the cases described by the GDPR (article 20, GDPR);

Right to object - The right to object to the processing of the data concerning them, unless the Data Controller has legitimate reasons to continue the processing (article 21, GDPR);

Right to complain to the relevant authority - The right to file a complaint with the Data Protection Authority, Piazza di Montecitorio n. 121, 00186, Rome (RM), Italy.

To exercise your rights or obtain the information to transfer your data to a third-party country, you may contact BLS Srl, with headquarters in Milan, Via dei Giovi, 41 – 20032 Cormano (MI) - Italy, Tel. 02 39310212, send a fax to 02 66200473, send an email to privacy@blsgroup.it, or send a letter addressed to the company.

Without prejudice to any other administrative or judicial remedy, you have the right to complain to the relevant Data Protection Authority, if you believe the data processing does not comply with EU Privacy Regulation.

BLS Srl
The Legal
Representative
Mr Luciano Zani