

## **Information on how the Protiviti S.r.l. website processes the personal data of users.**

Protiviti S.r.l., with registered offices at via Tiziano 32, 20145 Milan, Italy tel. (+39) 02.6550.6301, fax. (+39) 02.6550.6333, in its capacity as the Controller (hereinafter also “Protiviti” or the “Controller”) is committed to respecting your privacy and protecting your personal data. With this page, Protiviti provides information on how the personal data of users who visit the Site is processed.

This information is provided by Protiviti, as the Controller, with regard to the Site only, and not with regard to any other website that may be accessed by the user by following links contained on the same (for which reference should be made to the respective data protection information/policies).

Protiviti informs users that personal data provided by them or, in any case, acquired when they request information and/or make contact or make use of the services through their smartphones, or any other tool used to access the Internet, including browsing data, will be processed in compliance with the applicable data protection legislation, with particular reference to Regulation (EU) 679/2016 (hereinafter also “EU Reg. 2016/679” or the “GDPR”).

### **Browsing data**

The computer systems and software procedures used to operate the Site acquire, during their normal operation, certain personal data whose transmission, based on the TCP/IP protocol, is implicit in the use of the Internet.

This information is not collected to be associated with identified data subjects. However, by its very nature, through processing and association with data held by third parties, it could allow users to be identified.

This category of data includes the IP addresses or domain names of the devices used by users to access the Site, the addresses in URI (Uniform Resource Identifier) notation of the resources requested, the time of the request, the method used to submit the request to the web server, the size of the file obtained in response, the numerical code indicating the status of the response given by the web server (successful, error, etc.) and other parameters relating to the user’s operating system and computer environment.

### **Data provided by the user**

Users may be asked to provide some personal data (e.g. personal details, contact details) to allow Protiviti to provide the requested services. In addition, the use of certain Site features, sending emails, and completing contact forms may involve additional personal data being processed in order to respond to a request for information and/or to forward documentation. Specific detailed information may be given or displayed on the pages dedicated to such services.

### **Cookies**

A cookie is a short piece of text that is sent to your browser and, if necessary, saved on your computer (or your smartphone/tablet or any other tool used to access the Internet); this generally occurs every time you visit a website. Protiviti uses cookies for various reasons with the aim of providing you with a fast and secure digital experience such as, for example, allowing you to maintain your connection to the secure area whilst browsing the Site.

Cookies stored on your device cannot be used to retrieve any data from your hard disk, nor transmit computer viruses nor identify or use your email address. Each cookie is unique to the browser and device you use to access Protiviti's Site. In general, cookies are used to improve a website's operation and the user's experience when using it, although cookies may also be used to send advertising messages).

For detailed information on Cookies, see the [dedicated page](#).

### **Purposes for which personal data is processed and the legal basis for doing so**

Personal data will be processed to provide the requested service, i.e. access to the Site, the ability to browse the Site and the ability to deliver Site content. In addition, where necessary under applicable data protection legislation, personal data will be processed on the basis of the user's consent, freely given and expressed, for one or more specific purposes.

Without prejudice to the legal bases given above, personal data will be processed within the limits of that strictly necessary to achieve the following purposes:

1. To allow use of the information services made available by the Controller in connection with the Site, to manage requests to be contacted or requests for information. Providing data for these purposes, in connection with a pre-contractual and/or contractual phase, or functional to a user request, is optional. However, if the data is not provided, it may be impossible for Protiviti to provide the services requested;
2. To prepare anonymous statistics on the use of the Site and to check that it is functioning correctly;
3. To ascertain liability in the case of a computer crime against Protiviti's Site, or other websites connected or linked to it.
4. To comply with the obligations under EU and domestic legislation, to protect public order, to detect and suppress offences.

### **Methods by which personal data is processed and storage times**

In order to carry out the aforementioned activities, personnel appointed by Protiviti may become aware of personal data, as part of the organisations responsible for web services and the Site's performance. Personal data may also be processed using computerised procedures and electronic communication systems, duly protected by appropriate security and confidentiality measures, as well as with methods and logic consistent with the purposes for which the data was collected.

The personal data processed will be kept for the time necessary to provide the information and services requested, in accordance with the principle of minimisation. For details on cookie storage times, see the [dedicated page](#).

### **Scope of communication and transferring of data**

In order to achieve the aforementioned purposes, Protiviti may communicate personal data outside the European Union, to third parties who provide services to the Controller. The only data communicated to these third parties will be that data which is strictly necessary to providing the services requested by Protiviti, and Protiviti will take all the necessary measures to protect this personal data. In addition to the Protiviti Group companies, affiliates, subsidiaries and/or parent companies, we may also disclose personal data to our commercial or technical service providers, duly appointed as processors for the purpose. In addition, personal data may be communicated to competent public bodies and

authorities to comply with regulatory obligations or to ascertain liability in the event of a computer crime against the Site. Personal data may also be communicated to third parties (in their capacity as processors or, in the case of providers of electronic communication services, independent controllers) who provide IT and telematic services (e.g. hosting services, website management and development) and who Protiviti uses to perform technical and organisational tasks and activities which are instrumental to the Site's correct functioning. The parties belonging to the aforementioned categories may operate as independent controllers or, when necessary, as processors duly appointed by Protiviti.

Protiviti employees or consultants working for Protiviti, specifically appointed as processors or persons in charge of the processing, may also become aware of personal data.

The updated list of Processors is available, upon request, from Protiviti at the contact details below.

### **Data Subject's rights**

Users may exercise their rights, as recognised by legislation on the protection of personal data, at any time. These rights include the right to access their personal data, the right to have this data rectified or erased, the right to restrict processing of their personal data or to object to such processing, and the right to have their personal data made portable.

These rights can be exercised:

- by sending a registered letter to: Protiviti S.r.l., via Tiziano 32, 20145 Milan, Italy, marked for the attention of Privacy;
- by emailing: [privacy@protiviti.it](mailto:privacy@protiviti.it).

In addition, users have the right to submit a complaint to the Italian Data Protection Authority (<https://www.garanteprivacy.it/>).

This document is subject to updates. We therefore invite you to visit this section of our Site periodically in order to view any changes or additions.

*Last update: 29 June 2020*

### **Information on how Protiviti S.r.l. processes personal data in relation to its newsletter**

Protiviti S.r.l., with registered offices at via Tiziano 32 - 20145 Milan, Italy, tel. (+39) 02.6550.6301, fax. (+39) 02.6550.6333, in its capacity as the Controller (hereinafter also "Protiviti" or the "Controller") is committed to respecting your privacy and protecting your personal data.

With this page, Protiviti provides information on how the personal data of users who subscribe to the newsletter is processed.

Protiviti informs users that the personal data provided by them or, in any case, acquired when they request information and/or make contact, will be processed in compliance with the applicable data protection legislation, with particular reference to Regulation (EU) 679/2016 (hereinafter also the "GDPR").

### **Purposes for which personal data is processed and the legal basis for doing so**

Personal data will be processed to send newsletters, promotional material, information, promotions and updates regarding initiatives/events and offers aimed at users. Personal data will also be used for market research, economic analysis and statistical purposes.

The legal basis for such processing is the Controller's legitimate interest in promoting the company's services and the initiatives/events organised for customers who have been provided with services similar to those being promoted, or prospects, who have shown an interest in the services being offered by Protiviti by providing their contact details for future communications.

Personal data will be processed within the limits of that strictly necessary to achieve the purpose described above. For this purpose, providing data is optional. Users who decide not to provide their data face no consequences whatsoever, other than making it impossible for Protiviti to provide them with the above service.

### **Methods by which personal data is processed and storage times**

In order to carry out the aforementioned activities, personnel appointed by Protiviti may become aware of personal data, as part of the organisations responsible for web services and the Site's performance. Personal data may also be processed using computerised procedures and electronic communication systems, duly protected by appropriate security and confidentiality measures, as well as with methods and logic consistent with the purposes for which the data was collected.

The personal data processed will be stored until a request is received from the user to unsubscribe from the service.

### **Scope of communication and transferring of data**

In order to achieve the aforementioned purposes, Protiviti may communicate personal data outside the European Union, to third parties who provide services to the Controller. The only data communicated to these third parties will be that data which is strictly necessary to providing the services requested by Protiviti, and Protiviti will take all the necessary measures to protect this personal data. In addition to the Protiviti Group companies, affiliates, subsidiaries and/or parent companies, we may also disclose personal data to our commercial or technical service providers, duly appointed as processors for the purpose. In addition, personal data may be communicated to competent public bodies and authorities to comply with regulatory obligations or to ascertain liability in the event of a computer crime against the Site. Personal data may also be communicated to third parties who provide IT and telematic services (e.g. hosting services, website management and development) and who Protiviti uses to perform technical and organisational tasks and activities which are instrumental to the Site's correct functioning. The parties belonging to the aforementioned categories may operate as independent controllers or, when necessary, as processors duly appointed by Protiviti.

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Users may exercise their rights, as recognised by legislation on the protection of personal data, at any time. These rights include the right to access their personal data, the right to have this data rectified or erased, the right to restrict processing of their personal data or to object to such processing, and the right to have their personal data made portable.

These rights can be exercised:

- by sending a registered letter to: [Protiviti S.r.l., via Tiziano 32, 20145 Milan, Italy, marked for the attention of Privacy](#)
- by sending an email to: [privacy@protiviti.it](mailto:privacy@protiviti.it).

In addition, users have the right to submit a complaint to the Italian Data Protection Authority (<https://www.garanteprivacy.it/>).

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