

PRIVACY POLICY

This Policy is provided pursuant to the provisions of EU Regulation 2016/679 (General Data Protection Regulation - **GDPR**).

DATA CONTROLLER

The data controller is 4c S.r.l., with registered head office in Corso Buenos Aires 90, 20124, Milan, VAT number 08797090969.

COLLECTED DATA

The personal data processed pursuant hereto are collected directly from the data subject, or automatically.

The data provided by the data subject consist of all the personal data given to the data controller, through any means, directly by the data subject. More specifically, they may be all those personal data provided through the albo.4clegal.com Website, or other platforms hosted on 4clegal.com's subdomains, for example, by registering and/or logging in to a reserved area; entering into an agreement with 4c S.r.l. or 4 S.r.l.'s customers, writing to a 4c S.r.l. email address or calling a 4c S.r.l. phone number.

Automatically collected data are the browsing data. The IT systems and software procedures operating on our Website acquire, within the scope of their normal activity, certain personal data the transmission of which is implied by the Internet browsing protocols. Such data include, but are not limited to, IP addresses, the type of browser used, the operating system, the domain name and addresses of the Websites from which 4cLegal Website was accessed, any information on the web pages visited by the users within 4cLegal Website, the time of access, the time spent on each page, the analysis of the paths in the Website, and other parameters regarding the operating system and the user IT environment.

PURPOSES AND LEGAL BASIS OF DATA PROCESSING

Contract services. Purposes: providing the goods and/or the service requested by the user, managing the contracts entered into by the user, undertaking the necessary administrative, accounting, fiscal and legal procedures, and fulfilling the requests made by the user. Legal basis: the processing activities carried out for these purposes are necessary to perform the obligations arising from the contracts and do not require a specific consent by the data subject.

Informational and/or promotional communications. Purposes: sending or disseminating communications, including through newsletters, having (i) an informative nature regarding the activity of 4c S.r.l., including events, courses, publications, insights and multimedia contents; or (ii) promotional nature regarding the services offered by 4c S.r.l. Legal basis: the processing activities carried out for these purposes are made with the express consent provided by the user.

PROCESSING METHODS

The processing of personal data is undertaken through automated (DB, CRM platforms, etc.) and non-automated tools, exclusively for the time strictly required to fulfill the purpose for which the same data were

collected, in full compliance with the principles of lawfulness, correctness, necessity and relevance set forth by the privacy laws and regulations in force.

LINK FROM/TO THIRD-PARTY WEBSITES

It is possible to connect, from this Website, through specific links, to third-party Websites, or vice versa.

The data controller declines any responsibility with regard to the possible request on the part of, and/or release of personal data to, third-party Websites and regarding the management of authentication credentials provided by third parties.

DATA STORAGE

The data processed to perform a contract will be stored for the entire duration of the contractual relationship. They will be stored after the termination the relevant contractual relationship exclusively for the time necessary to perform all legal obligations, unless it is necessary to store them for a longer period in order to defend or exercise any rights or comply with further legal obligations or orders of the authorities.

The data processed to send or disseminate informational and/or promotional communication will be stored until the interested data subject revokes his/her consent, unless their storage is still necessary for other purposes, provided that yearly verification of the data stored shall be undertaken in order to cancel those data that are deemed obsolete.

DATA SUBJECT RIGHTS

The individuals to whom the above-mentioned data refer ("data subjects") may exercise their rights according to the modalities and limitations set forth by the privacy laws and regulations in force.

In particular, the data subject is entitled to : (i) Access: they can ask 4c srl to confirm whether it is processing of data concerning them, in addition to further clarifications regarding the information referred to in this Policy, as well as to reasonably provide their data. (ii) Rectification: the data subjects can ask 4c srl to rectify or integrate the data provided by they and/or in our possession, in case such data are incorrect. (iii) Erasure: the data subjects can ask 4c srl to erase their data acquired or processed by 4c S.r.l. in case such data are no longer necessary for our purposes or where there are no controversies or disputes in place; in case of revocation of consent, or in case of their opposition to processing of data; in the event of illegal data processing, or if there is a legal obligation to erase them. (iv) Limitation: the data subjects can request the limitation of the processing of their personal data, should any of the conditions referred to in section 18 of the GDPR apply.; in this case, the data of the interested data subject will be processed, except for storage, only with the consent of the such data subject or for the reasons indicated in section 18 of GDPR, paragraph 2. (v) Opposition: the data subjects may object at any time to the processing of their data made on the basis of our legitimate interests, unless there are legitimate reasons for us to proceed with the data processing prevailing on the data subjects' ones, including, but not limited to the exercise or defense of our right in court. If personal data are processed for direct marketing purposes, the data subjects shall be entitled to object at any time to the relevant processing. (vi) Portability: the data subjects can request to receive their data, or to have they transmitted to another data controller indicated by them, in a structured, commonly used, machine-readable format.

Furthermore, pursuant to the provisions of section 7, par. 3, of GDPR, the data subjects can exercise their right to withdraw consent at any time, without affecting the lawfulness of the processing based on their prior consent.

Finally, the data subjects are entitled to file a complaint before the Supervisory Authorities, i.e., in Italy, the *Garante per la Protezione dei Dati Personali* (Personal Data Protection Authority).

To exercise these rights, report problems, or ask for clarifications on the processing of their personal data, the data subjects can send an email to info@4clegal.com.

In addition, requests can also be sent by mail, by writing to the data processor, 4c S.r.l., with registered office in c.so Buenos Aires 90, 20124, Milan, specifying the subject of the request.

COOKIES

Regarding the cookies used on the website www.4clegal.com, please consult our Cookies Policy.

UPDATES AND AMENDMENTS

The possible entry into force of new laws and regulations on this matter, as well as the continuous examination and updating of services, could entail the need or usefulness to modify the methods and terms set forth herein. Therefore, this document may be subject to amendment from time to time. Please consult regularly this page. We will publish any amendments to this Policy on this page and, in case of significant variations, we will highlight them with further methods.