

Information on the processing of personal data pursuant to Articles 13 and 14 of EU Regulation 2016/679 (Privacy Policy)

If you are reading this document (**Privacy Policy**), it is because you are visiting our platform (**Panel Platform**). This **Privacy Policy** is drafted pursuant to Articles 13 and 14 of the EU Regulation 679/2016 (hereinafter **GDPR**) and provides you with some examples of how we process your Data. If you have any questions about this Privacy Policy or how we process your Data, please send your request to: privacy@4clegal.com or dpo@4clegal.com. The information and Data provided by you or otherwise acquired by us will be processed in accordance with the provisions of the GDPR and the confidentiality obligations that inspire the activity of the **Data Controller**. Please also note that this **Privacy Policy** does not apply to the processing carried out on the [4c www.4clegal.com](http://www.4clegal.com) website, nor to the processing carried out when you purchase the so-called E-Learning Platform (available at <https://elearning.4clegal.com/>), for which we invite you to consult the respective privacy policies. This **Privacy Policy** also does not apply to processing carried out in the individual Panels of the **Companies** or **Legal Departments**. By accessing those sections, you will find the information on the processing operations carried out there.

Please note that this **Privacy Policy** is divided into two sections. The first section is dedicated to the processing operations that are carried out on the **Panel Platform** and are common to all users who access it, regardless of the type of category they belong to (**Professional, Legal Department or Company**). In this first section you will find all the most relevant information relating to the processing of your Data, including information on the **Data Controller**, the Data Protection Officer, as well as on how to exercise your rights. In section 11, entitled "Dedicated Sections", on the other hand, you will find two subsections, 11.A. and 11.B., dedicated respectively to **Professionals**, the first, and to **Companies** and **Legal Departments**, the second, in which the type of Data collected, the relevant processing activities and the retention periods applied to your Data specific to your category are described in a dedicated manner. We therefore invite you to read the section of interest for all the more specific details on the processing of your Data.



1. About us

4c S.r.l. with registered office in Via Fontana n. 18, Milan, 20122 (hereinafter, "4c"; "we" or "us") is the **Data Controller** of your Data.



2. Data we collect and process

We collect **Data** from our **Panel Platform**. The Data collected and the purposes for which we process it depend on the management of your **Browser** and **Device** settings. The purposes for collecting your Data are set out in the section "Why we collect and process your Data and legal basis".

a) Browser and Device Data and Cookies

When you use the **Panel Platform** we collect information about the **Browser** and **Device** you are using. This information includes your IP Address, date, time and requested URL, **Unique Identifiers** and other information such as the type of **Browser** or **Device**. Browser or Device information may include your operating system, language, network settings, telephone or Internet service provider, third party applications installed and lists of plug-ins.

Some of this information is collected using **Cookies** and Other **Tracking Technologies** on your **Browser** or **Device**. More information about Cookies is available in our [Cookie Policy](#).

b) Data voluntarily provided by you

This **Privacy Policy** contains information on the processing of the Data that you voluntarily provide in order to access the **Panel Platform**, in the event of requests for assistance or to verify the NFTs issued by 4c (which you can check, in particular, at the link <https://panel.4clegal.com/it/nft/show>).

In any event, we hereby specify that, when you provide Data belonging to other persons, you act as an **independent Data Controller**, assuming all the obligations and responsibilities provided for by law and, on this point, providing the widest possible indemnity in respect of any dispute, claim, request for compensation for damages caused by processing, etc. that the **Data Controller** may receive from third parties.



3.
Why we collect
and process
your data and
legal basis

Your **data** is processed for the following purposes:

- a. to enable the provision of services requested by you from time to time, e.g. in the event of a request for assistance during registration to the [Panel Platform](#) or for the verification of NFTs issued by 4c ("[Provision of Services to all Users](#)").



The processing for this purpose is based on the execution of your request. You are not obliged to provide **Data** to 4c for this purpose, but if you fail to do so we will not be able to fulfil your request..

- b. send you offers on products or services similar to those you have purchased and requested from 4c by email even in the absence of your specific consent ("Soft Opt-in"), unless you expressly refuse to receive such communications, which you may express at any time by writing to privacy@4clegal.com or by expressly denying your consent for Marketing purposes.



This processing is legitimate pursuant to Article 130, paragraph 4, of the Privacy Code. You may object to the processing of your **Data** for this purpose both when requesting products and services (by expressly denying consent to processing for Marketing purposes), and during subsequent commercial communications from 4c, by writing to privacy@4clegal.com or via the *unsubscribe* mechanism present in the *footer* of the e-mails received.



- c. to comply with legal obligations and orders to which we are subject, which form the legal basis for the processing of your Data ("**Compliance with legal obligations**").



- d. to prevent fraud and abuse in the use of the [Panel Platform](#) and enable us to defend our rights and legitimate interests ("**Abuse/Fraud**"). This processing is carried out on the basis of the legitimate interest of the [Controller](#) to prevent and detect fraudulent or potentially unlawful activities and to enable us to defend ourselves in court.



- e. for statistical purposes, without it being possible to trace your identity ("**Statistics**"). Please note that such processing is not performed on Data and can therefore be freely carried out by the [Data Controller](#). Such processing is based on the legitimate interest of 4c.



4.
How we use
your data
(processing
methods)

The **Data collected** for the above-mentioned purposes are processed both manually and in an automated manner, i.e. by means of programmes or algorithms that analyse the Data inferred from your activities, information on your location and Data collected from your [Browser](#) and [Device](#)..



5.
How we can
disclose your
data

We may share your Data with the following recipients and/or categories of recipients ('**Recipients**')

- **Persons authorised** by us to carry out any of the Data-related activities described in this [Privacy Policy](#), e.g. our employees and collaborators who have assumed a duty of confidentiality and abide by specific rules for the processing of your **Data**;
- **Our Processors**: external parties to whom we delegate certain processing activities. For example, security system providers, consultants, accountants,

hosting providers, etc. We have entered into agreements with each of our [Processors](#) to ensure that your [Data](#) is processed with adequate safeguards and only in accordance with our instructions;

- **System administrators:** our employees or those of the [Processors](#) to whom we have delegated the management of our computer systems and who are therefore able to access, modify, suspend or limit the processing of your [Data](#). These persons have been selected, adequately trained and their activities are tracked by systems that they cannot change, as required by the provisions of our competent supervisory authority;
- **Police authority or any other authority whose provisions are binding on us:** this is the case when we have to comply with a judicial order or the law or defend ourselves in legal proceedings.



6. Where your Data are located

Your [Data](#) may be stored, accessed, used, processed and disclosed outside your jurisdiction, including within the European Union, the United States of America or any other country where our [Processors](#) and sub-[Processors](#) are located, or where their servers or cloud computing infrastructure may be hosted. We endeavour to ensure that our Recipients' processing of your [Data](#) complies with applicable data protection laws, including EU legislation to which we are subject. Where required by EU data protection law, transfers of your [Data](#) to Recipients outside the EU will be subject to appropriate safeguards (such as EU standard contractual clauses for data transfers between EU countries and third countries), and/or other legal bases in accordance with EU law. For more information about the safeguards we implement to protect [Data](#) transferred to third countries outside the EU, you can write to us at privacy@4clegal.com.



7. How long we keep your data

Your data processed for the:

- **Providing the service to all users (see section 3.a):** they will be kept for the time strictly necessary to achieve those purposes. Since the processing is carried out for the provision of services, the [Data Controller](#) may further retain your [Data](#) for as long as permitted by Italian law to protect its interests (Art. 2946 et seq. of the Civil Code);
- **Soft opt-inf** (see sect. 3.b): will be retained, as a general rule, until you object;
- **Fulfilment of legal obligations** (see sect. 3.c): will be retained for as long as required by the specific obligation or rule of law or applicable regulation;
- **Abuse/Fraud** (see sect. 3.d): they will be retained for the time necessary to achieve those purposes and therefore until such time as 4c is obliged to retain them in order to protect itself in court and communicate them to the competent authorities upon the occurrence of an Abuse/Fraud.

For [Cookie](#) retention times please see our [Cookie policy](#).

Further information on the period of [Data](#) retention and the criteria used to determine that period may be requested by writing to the [Data Controller](#) to privacy@4clegal.com. Once the relevant retention period has expired, your [Data](#) will be deleted in accordance with our retention policy, unless 4c needs to further retain your [Data](#) to defend itself or its clients in court. You can request further information about our retention policy by writing to us here: privacy@4clegal.com.



8. How to Control Your Data and Manage Your Choices

At any time, you can request:

- **Access to your [Data](#) (right of access):** we will provide you with your [Data](#), such as your name, age, [IP Address](#), [Unique Identifiers](#), e-mails and expressed preferences, together with the [Privacy Policy](#) you received when you provided them;
- **Exercising the right to the portability of your [Data](#):** we will provide you with an interoperable file containing [data](#) about you;

- **Correct your Data (right of rectification):** for instance, you can ask us to change your e-mail address or telephone number if they are incorrect;
- **Limit the processing of your Data (right to restrict processing):** for instance, when you believe that the processing of your Data is unlawful or that processing based on our legitimate interest is not appropriate;
- **Delete your Data (right to erasure):** e.g. when you do not want your Data to be stored;
- **Objection to processing activities (right to object):** you have the right to object to the processing of your Data by explaining to us the reasons justifying your objection. In this case, 4c reserves the right to evaluate your request, which may not be accepted if there are compelling legitimate grounds for processing that override your rights, interests and freedoms. You also have the right to object at any time and without justification to the performance of profiling and marketing activities, including by registering in the Register of Objections pursuant to Presidential Decree No. 26 of 27 January 2022.
- **Withdrawing your consent (right to withdraw consent)** You can always revoke your previously expressed consent by means of the unsubscribe button in our marketing communications or also in the manner described in this section, without affecting the processing carried out before revoking it. We remind you that pursuant to Presidential Decree No. 26 of 27 January 2022, you may object or revoke your consent to marketing activities by registering with the Register of Objections. If you have given your consent to marketing activities in the context of your contractual relationship with us, or if your contractual relationship with us ended no more than thirty days ago and therefore the Register of Objections does not apply, if you are no longer interested in receiving such communications, you may revoke your consent at any time by writing to the address indicated below.

You may exercise the above rights or express any concerns or complaints about the use of your Data by us directly at: privacy@4clegal.com.

At any time, you can also:

- contact our Data Protection Officer ('DPO'), here : dpo@4clegal.com;
- contact the Data Protection Authority, here you can find a list of all Supervisory Authorities per country: https://edpb.europa.eu/about-edpb/board/members_en.



9. What this Privacy Policy does not cover

This [Privacy Policy](#) explains and covers the processing we perform as the [Data Controller](#) within the [Panel Platform](#).

This [Privacy Policy](#) does not cover processing by parties other than us. In these cases, we are not responsible for any processing of your Data that is not covered by this Privacy Policy. Please also note that this Privacy Policy does not cover the processing carried out on the 4c website (www.4clegal.com) or on the E-Learning Platform (<https://elearning.4clegal.com/>), for which we invite you to consult their respective privacy policies. This [Privacy Policy](#) also does not apply to processing carried out in the individual [Company Panels](#) or [Legal Departments](#) or in the "Track record Hub" section. By accessing those sections, you will find the privacy policies for the processing carried out there.

10. Changes to the Privacy Policy

We reserve the right to adapt and/or amend this [Privacy Policy](#) at any time. We encourage you to review this Privacy Policy periodically for changes, unless these changes are material. In that case we will notify you in an appropriate manner.

**11.
Dedicated sections**

As mentioned in the introduction, please note that what is indicated in the previous sections of the [Privacy Policy](#) refers to the processing of the [Data](#) of all those who use the [Panel Platform](#), but, in addition to what is indicated above, we will also collect and process other [Data](#) depending on whether you are a [Professional](#) or a [Company](#) or [Legal Department](#). We therefore invite you to consult the following sub-sections according to your category, as they contain important information on the processing of your [Data](#)..

**11.A.
Are you a Professional?**



**11.A.1.
Data we collect and process if you are a Professional**

In addition to what is indicated in section 2 of this Privacy Policy, if you are a [Professional](#) we also collect the [Data](#) indicated below.

a. Data collected for the due diligence of the Professional required to register for the Panel Platform and Third Party Data

In order to register on the [Panel Platform](#), you will be asked to release certain [Data](#), including: details of your professional experience, skills acquired, contact details, professional domicile, and more generally all your work and study experiences. In addition, you will be asked to provide a copy and last receipt of payment of your professional risk insurance policy, a copy of an identity document, a copy of your professional membership card and your CV. This [data](#) will be processed by 4c for the purposes of verifying their veracity and to carry out a due diligence activity on you and your skills, which also consists of verifying your identity. This activity, therefore, serves to allow you to firstly be accredited to the [Panel Platform](#) and, subsequently, to the [Panels](#) of 4c's clients, where permitted by them and in accordance with the terms and conditions set out from time to time. Please note that some of the [Data](#) collected during the accreditation process and, in particular, the copy of your identity document and the copy of your ID card, will be deleted by 4c once the above-mentioned checks have been completed.

In addition, after you have been accredited to the [Panel Platform](#), 4c may also invite you to be accredited to specific [Panels](#) of its Clients' [Companies](#) or [Legal Departments](#), if deemed to be in line with your expertise (see the purpose of 'Referral to Clients' in section 11.A.2.a of the [Privacy Policy](#)); in such cases, you will be free to accredit as well as refuse the suggestion receive.

If you so request, we may also process this [Data](#) and that indicated in letters b. and c. of this section to generate your Curriculum Vitae.

Please also note that when you are accredited to 4c's customer [Panels](#), the [Company](#) or the [Legal Department](#) from which you have requested accreditation will process your [Data](#) as an [autonomous Data Controller](#), except for specific cases expressly provided for in the individual privacy policies that you will find published in each [Panel](#) of reference; we therefore invite you to consult the privacy policy on the processing of [Data](#) published therein.

b. Data collected for Track Record validation and Third Party Data (Track Record Hub)

In order to obtain [Track Record](#) validation, you may fill in the dedicated forms by entering details of these skills/assignments/experience. To this end, 4c will contact your client or other person indicated by you to ask for confirmation of the information you have provided. After confirmation by the contact you have provided, the [Track Record](#) will also be considered validated for the purposes of accreditation to 4c's Client [Panels](#). Please note that the third party's [Data](#) and information will be processed by 4c only for the purpose described herein; please

also note that if you provide Data of third parties to 4c, you will act as an autonomous Data Controller, assuming all the obligations and responsibilities under the law. In this respect, you hereby grant 4c the widest indemnity against any dispute, claim, request for compensation for damage caused by processing, etc. that 4c may receive from third parties whose Data have been processed in breach of the applicable data protection laws. Please do not provide us with Data relating to criminal convictions and offences (as per art. 10 GDPR) or other information relating to your health, political opinions or religious beliefs (as per art. 9 GDPR) with respect to you and/or third parties and please note that, should you decide to provide us with such Data, we will not be able to process it in any way and will therefore delete it.

Please note that the [Data](#) indicated here, together with those described in letters a. and c. of this section, will be used to generate your Curriculum Vitae if you wish to activate this service.

In any case, please note that when you access the section named "[Track Record Hub](#)", you will find a dedicated [Data](#) Processing Notice, which we invite you to consult before submitting your [Data](#).

c. Data collected in the Sustainability Hub (so-called 'ESG')

Within the context of 4c's services, there is also the one that allows you to attest the [ESGs](#) you have. 4c may invite you to access a dedicated panel where you can select the ESG items you wish to attest. For their validation, we will ask you to describe the ESG to be validated and to attach documentation proving your claims. Here, you may also provide us with information and [Data](#) from third parties, such as identification and contact details of employees of your firm or your clients, whom 4c may contact for the validation of your [ESG](#) claim(s). Please note that third party [Data](#) and information will only be processed by 4c for the purpose described herein; please also note that if you provide third party [Data](#) to 4c, you act as an [autonomous Data Controller](#), assuming all legal obligations and responsibilities. In this sense, you grant 4c the widest indemnity in respect of any dispute, claim, request for compensation for damage caused by processing, etc. that may be received by 4c from third parties whose [Data](#) have been processed in violation of the applicable data protection regulations. Please do not provide us with information relating to your state of health, political opinions or religious beliefs (referred to in Art. 9 GDPR) with respect to you and/or third parties, and please note that if you decide to provide us with such [Data](#), we will not be able to process it in any way and will therefore delete it (e.g. for the validation of a parenting policy, please do not provide us with the Contact Information of a person who has actually taken maternity leave; or for the validation of an inclusion policy, please do not provide us with the Contact Information of your employees or staff with disabilities).

Come detto sopra, anche questi [Dati](#) potranno essere utilizzati per generare il tuo Curriculum Vitae.



11.A.3 Source of your Data

Your Data may have been provided to 4c by the following parties:

- 4c's client [companies](#);
- [Legal departments](#) of 4c's Client [Companies](#);
- Individual [professionals](#) registered on the [Panel Platform](#) for the due diligence process carried out by 4c for [Track Record](#) and [ESG](#) validation and in case of partnerships or new synergies.



11.A.4. Why we collect and process your Data and legal basis for Professionals

In addition to what is stated in section 3 of this [Privacy Policy](#), if you are a [Professional](#), your [Data](#) is used for the following purposes:

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- a. to enable you to register and use the [Panel Platform](#), to enable you to join the Panels of 4c's Client Companies or provide you with the service of generating your Curriculum Vitae ("**Provision of Services to Professionals**").

Please note that, when you apply for registration to the [Panel Platform](#) or other [Company Panels](#), 4c may analyse your skills and professionalism, including those included in your [Track Record](#) or Curriculum Vitae, to:

- refer you to other [panels](#) so that you can assess them and, if appropriate, accredit yourself,
- to signal your profile to other professionals registered on the 4c [Panel Platform](#), or to other clients of 4c who commission 4c to carry out a specific headhunting service, or a scouting and advisory activity, in order to create new synergies and partnerships, without prejudice to the possibility of refusing such invitations/signals as well as the possibility of autonomously searching for [Panels](#) to which you can spontaneously be accredited independently of the 4c recommendation. The Track Records referred to in section 11.A.1.b above may also be used for this purpose when shared in the Directory of [Companies](#) or [Legal Departments](#). For this processing (hereinafter also referred to as "**Referral to Clients**"), 4c may process and analyse your Data in order to better understand your professional experience and qualifications; this assessment is necessary for the **Referral to Clients** to be relevant and for you to have a realistic chance of obtaining one or more professional assignments appropriate to the skills and experience you have described to us.



The processing for this purpose is based on the execution of your request, contractual and pre-contractual measures as these are all services related to being part of 4c's network. You are not obliged to provide [Data](#) to 4c for this purpose, but if you fail to do so we will not be able to fulfil your request.

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- b. to contact your clients or designated collaborators in order to validate the [Track Record](#) or declared [ESG](#) (hereinafter '**Validations**').



This processing is based on 4c's legitimate interest in offering a service to its clients to validate the skills possessed by the [Professionals](#) accredited to the [Panels](#). To object to such processing, ignore the email received and you will no longer be contacted to validate [Track Records](#) or [ESGs](#), and 4c will also cease any further processing of your [Data](#). If, on the other hand, you decide to reply to the email received, 4c will retain your [Data](#), including the relevant validation, for as long as the [Professional](#) remains registered to the [Panel Platform](#)..

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- c. to communicate your Identification and Contact [Data](#), validated [Track Records](#) and [ESG](#) profiles to the [Companies](#) and [Legal Departments](#) that have purchased the "4cLegal Directory" service from 4c ("**Directory**") or the Dedicated [Panels](#) with which you are accredited ("**Communication**").



This processing is based on the execution of the contract to which you are a party and in particular in joining the 4c network, which allows you to gain visibility with potential clients and create partnerships with clients and other [Professionals](#). Processing for this purpose is optional, but if you do not provide your [data](#), you may reduce your visibility and not join certain proposed partnerships..

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- d. to optimise the services of 4c and improve the operation of the [Panel Platform](#) as well as the services offered to its registered [Professionals](#)..
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This processing is based on 4c's legitimate interest in improving and offering better services to its clients to the [Professionals](#) who are members of 4c's network ('**Optimising our services to Professionals**').

- e. to send you promotional communications, surveys and market research on 4c's products and services or those of its business partners, but without in that case sharing Data but only aggregate information. Such communications may be sent to your Contact Data by available automated means (e.g., email, SMS, WhatsApp, unattended telephone, chat bots, website pop-ups) and non-automated means (e.g., paper mail and telephone with operator) ("**Marketing**").

This processing is based on the consent that you will be able to express by means of the form present during registration with the Panel Platform or on the various forms present on the 4c website, or even at our events. Please note that 4c collects a single consent under the [Anti-Spam Guidelines](#) of the Italian Data Protection Authority, but you may revoke it at any time, even for one or more of the channels indicated, without prejudice to the lawfulness of the processing carried out prior to its revocation. You may revoke your previously expressed consent at any time by writing to the contact details indicated in section 8 of this Privacy Policy or by using the unsubscribe link present in each of our commercial communications.

Providing [data](#) for this purpose is optional and, in the absence of such data, you will not be able to receive promotional communications; without any consequences for you.

- f. to analyse your Data in order to show you content that may be of interest to you and to send you personalised information and promotional material ("Personalising our services"), including by using Cookies for targeted advertising and for analysing your interaction with 4c's Social Pages. In the latter case, the processing of your Data is carried out by 4c as co-processor with the provider of the social network used (in accordance with EDPB (European Data Protection Board) Guidelines No. 8/2020 on the use of social networks); the privacy policies of these providers, which we invite you to consult, also apply..

his processing is based on your consent, which you can give using the check-boxes at the bottom of the [Data](#) collection forms and withdraw at any time by contacting us. For Data collected through [Cookies](#) and [Other Tracking Technologies](#) please check our [Cookie Policy](#).



11.A.5. How can we disclose your Data if you are a Professional

In addition to what is indicated in section 5 of this Privacy Policy, if you are a [Professional](#), we may also share your [Data](#) with the following Recipients and/or categories of Recipients:

- **Companies or Legal Departments that have an active Panel** or that are looking for an expert in the health sector so that your profile can be evaluated for the purpose of awarding professional appointments. In this case, you will know the name of the company or legal department to which you have been referred, because 4c will contact you to invite you to apply to the panel of that client.;
- **other professionals registered on the Panel Platform, or 4c's clients who commission 4c to carry out headhunting or scouting and advisory activities**, to propose the creation of new synergies and partnerships;
- **4c's customers who have purchased the Directory**, for the purposes of the provision of this service, who may then view your Data as specified in section 11.A.4.c and for the purpose of '**Referral to Clients**';

- **clients/referrers/collaborators or other stakeholders** to certify the professional competences/experiences you declared for [Track Record](#) and [ESG](#) validation purposes.



11.A.6.
How long we keep your Data if you are a Professional

In addition to what is indicated in section 7 of this Privacy Policy, if you are a [Professional](#) your [Data](#) processed for the:

- **Provision of Services to Professionals** including **Referral to Clients**: they will be kept for the time strictly necessary to achieve those purposes. Since this is processing carried out to provide you with a service, the Data Controller may further retain your Data for as long as permitted by Italian law to protect its interests (Art. 2946 et seq. of the Civil Code). We would also like to point out that the copy of your identity document and badge requested during the accreditation process, once the verification of your identity is complete, will be deleted, since, as mentioned, this processing is exclusively for the purpose of carrying out due diligence on you.;
- **Validations**: will be stored until your deletion from the [Panel Platform](#);
- **Communication and to optimise our services**: they will be kept as long as you do not object to such processing in the manner indicated in the section **How to Control Your Data and Manage Your Choices**;
- **Marketing and personalising our services**: will be processed, as a general rule, until your consent is revoked.

11.B.

Are you a company or a legal department?



11.B.1.
Data we collect and process if you are a company/legal entity

In addition to what is indicated in section 2 of this Privacy Policy, if you are a [Company](#) or a [Legal Department](#) we also collect the [Data](#) indicated below.

a. Data collected for the use of the Panel dedicated to you and/or the Directory

In order to allow you to use the [Panel](#) dedicated to you and/or the 4c Directory, we may collect identification and contact data of those within your [Company](#) or [Legal Department](#) who are assigned to use the utilities of these services. Through this data, your staff will be able to access and use the services purchased by your [Company](#) or [Legal Department](#)..

Please note, however, that within your [Panel](#) you will act as an independent [Data Controller](#) both with respect to the [Data](#) of your employees or collaborators to whom you provide access and with respect to the [Data](#) of the [Professionals](#) that you may process following their registration to your [Panel](#) (which may also occur upon your invitation and/or following a recommendation by us or through their spontaneous candidature). This is with the exception of those processing activities that we reserve the right to carry out for the purpose of optimising our services as described in greater detail in the contractual documentation signed with you in respect of which 4c acts as [Data Controller](#).



11.B.2.
Why We Collect and Process Your Data and Legal Basis for Companies/Legal Entities

In addition to what is stated in section 3 of this Privacy Policy, if you are a [Company](#) or a [Legal Department](#) your [Data](#) is used for the following purposes:

- a. optimise our services. In particular, 4c reserves the right to analyse your [Data](#) in order to improve the operation of the [Panel Platform](#) and the [Panel](#) dedicated to you ("**Optimising the services to Companies/Legal Entities**").

This processing is based on 4c's legitimate interest in providing better services to its customers as well as optimising the operation of the [Panel](#). To object to such processing, you can contact us at the addresses indicated in section 8 of this [Privacy Policy](#).



11.B.3.
How long we keep your data if you are a company/legal entity

In addition to what is stated in section 7 of this Privacy Policy, if you are a [Company](#) or a [Legal Department](#) your [Data](#) processed for the purposes of:

- **Optimising services to companies/legal departments:** they will be retained as a general rule until you object, which you can do in the manner indicated in section 8 of this Privacy Policy.

12.
Licence

The icons shown in this Privacy Policy are 'Data Protection Icons' by [Maastricht University, European Centre on Privacy and Cybersecurity \(EPC\)](#) CC BY 4.0.

13.
Definitions

Other Tracking Technologies: pixel tags (trackers used with Cookies and embedded in web page images to track certain activities) or unique identifiers embedded in links to commercial communications that send us information when clicked.

Company or **Legal Department:** this refers to 4c customers who have concluded a contract with us for the use of the services provided on the Panel Platform by signing the contract on behalf of their company or public law body. Our services are often used in particular by the legal departments of companies, so we will also use this term within this Privacy Policy.

Browser: refers to the programmes used to access the Internet (e.g. Safari, Chrome, Firefox, etc.).

Cookie: is a small text sent to your Browser from our site (hosting the Panel Platform) by our Partners. It allows the site to store information such as the fact that you have visited the site, your language and other information. Cookies are used for various purposes, such as to record your preferences regarding the use of Cookies (Technical Cookies), to analyse and improve our services and to create new services and features or to personalise our services, including content that may be useful to you. The information transmitted by Cookies is subject to combination and/or cross-referencing with one of the Other Tracking Technologies, where applicable.

Personal Data: any information relating to an identified or identifiable natural person, directly or indirectly, as well as any information related or reasonably linkable to a particular individual or household. For example, an email address (if it relates to one or more aspects of an individual), IP Addresses and Unique Identifiers are considered Personal Data. Hereinafter, for convenience, the Personal Data referred to in this Privacy Policy will be referred to simply as "[Data](#)".

Device: refers to the electronic device (e.g. iPhone) through which you visit the Panel Platform.

Unique Identifiers: information that can uniquely identify the user through the Browser, the Device. In the Browser, the IP Address and Cookies are considered Unique Identifiers. On the Device, advertising identifiers provided by manufacturers, such as Apple's IDFA and Android's AAIG, that we use to analyse and improve our services and to create new services and features are considered Unique Identifiers. Please note that for these purposes and in line with the views of European regulators, we do not use other unique identifiers such as MAC addresses and IMEIs as they are not resettable by the user.



IP address: is a unique number used by the Browser, the Device to connect to the Internet. The Internet service provider provides this number to identify the provider and/or the approximate area where the user is located. Without this Data, you cannot connect to the Internet and use our services or content that may be useful to you.

Social Pages of 4c: indicates the social network pages used by 4c, and in particular those indicated at the following addresses: [Instagram](#), [Facebook](#), [LinkedIn](#), [Twitter](#).

Panel: means the individual platforms developed for our customers (Companies and Legal Departments) to which Professionals can accredit themselves.

Partner: this definition includes selected Partners with whom we may share your Data. Partners may belong to the following sectors: legal professionals; professors and other professionals who collaborate as speakers at 4c events and whose identity will be disclosed at individual events; companies, institutions and other entities that participate in the organisation of a 4c event and whose identity will be disclosed at individual events; information and communication services; professional and consulting activities; business support services; other third parties whose identity will be disclosed on a case-by-case basis.

Panel Platform: is the platform of 4c (<https://panel.4clegal.com/it/login>) where you can register to access the services set out in this Privacy Policy.

Professional: means the professional clients of 4c who use 4c's services provided on the Panel Platform and who offer their services to 4c's corporate clients via that Panel Platform.

Data Processor: refers to an entity appointed by us to process your Personal Data solely on behalf of 4c S.r.l. and in accordance with your written instructions.

Data Controller or Controller: refers to the legal person, public authority, service or other entity that, individually or jointly, determines the purposes and means for the processing of your Personal Data. This definition typically refers to 4c S.r.l.. In other cases, it is preceded by the word "autonomous" (e.g., "autonomous data controller" or "autonomous data controller") to indicate that your Personal Data is processed by an entity other than 4c S.r.l.

Track Record: means the competence of a Professional in a specific subject matter among those indicated by 4c or required by Companies and Legal Departments.
