

Privacy Policy on the Processing of Personal Data pursuant to Articles 13 and 14 of EU Regulation 2016/679 (GDPR)

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 EU Regulation 679/2016 (hereinafter GDPR) to provide you with all necessary information, including examples, regarding the processing of your data. For any clarification regarding this Privacy Policy or the methods of processing your data, please send your request to: privacy@4clegal.com or dpo@4clegal.com. The information and data you provide or otherwise acquired will be processed in compliance with the provisions of the GDPR and the confidentiality obligations that guide the Data Controller's activities.

Please note that this Privacy Policy does not cover the processing activities carried out on the 4C website www.4clegal.com, nor those carried out when you purchase the so-called E-Learning Platform (accessible at <https://elearning.4clegal.com/>), for which we invite you to consult the respective privacy notices. This Privacy Policy also does not apply to the processing carried out in the individual Panels of Companies or Legal Departments. By accessing those sections, you will find the privacy notices dedicated to the processing carried out therein.

Please note that this **Privacy Policy** is divided into two sections. The first part is dedicated to the processing activities carried out on the **Panel Platform** and is common to all users who access it, regardless of their category (**Professional**, **Legal Department**, or **Company**). In this first section, you will find all the most relevant information regarding the processing of your **Data**, including information about the **Data Controller**, the Data Protection Officer, and how to exercise your rights. In Section 11, titled "Dedicated Sections," you will find two subsections, 11.A and 11.B. The first is dedicated to Professionals, and the second to **Companies** and **Legal Departments**. These subsections describe in detail the types of **Data** collected, the related processing activities, and the retention periods applied to your **Data** specific to your category.

We therefore invite you to read the section relevant to you for all the specific details on the processing of your **Data**.



1. Who We Are

4C S.r.l., with its registered office at Via Visconti di Modrone 2, 20122 Milan, Milan, 20122 (hereinafter "4C," "we," or "us"), is the **Data Controller** of your **Data**.



2. What Data We Collect and Process

We collect **Data** from our Panel Platform. The **Data** collected and the related purposes of processing depend on the management of the settings of the browser and the device in use.

The purposes for collecting your **Data** are indicated in the section "Why We Collect and Process Your Data and Legal Basis."

a) Data Collected from the Browser and Device 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**, the date, time, and requested URL, **Unique Identifiers**, and other information such as the type of browser or device. Information regarding the **Browser** or **Device** may include the operating system, language, network settings, telephone operator or internet provider, installed third-party applications, and lists of plugins.

Some of this information is collected using cookies and **other tracking technologies** present in your **Browser** or **Device**. Further information about cookies is available in our [Cookie Policy](#).

b) To ensure the proper functioning, security, and integrity of our digital infrastructure, we collect and temporarily store system logs. These logs include technical information, such as IP addresses, browser types, access times, and requests made to the server. The collection of such data is strictly necessary to:

- identify and resolve any technical problems or malfunctions of our digital infrastructure;
- protect our infrastructure from unauthorized access, cyber-attacks, or other security threats;
- ensure the stability and performance of our services

Data collected through logs are used exclusively for technical and security purposes, necessary for the proper functioning of our infrastructure and to ensure the best possible experience for our users. We do not use this data for profiling or marketing purposes, nor do we share it with third parties for such purposes.

Logs are stored securely and are accessible only to authorized personnel trained in data protection. The data are kept for a limited period of 24 months, strictly necessary for the purposes mentioned above, after which they are deleted or anonymized..

c) Data voluntarily provided by you

This [Privacy Policy](#) contains information on the processing of [Data](#) voluntarily provided by you to access the [Panel Platform](#), in case of requests for assistance or for the verification of NFTs issued by 4C (which you can verify, in particular, at the link <https://panel.4clegal.com/it/nft/show>).

In any case, we specify as of now that, when you provide [Data](#) of other persons, you pose as an [autonomous Data Controller](#), assuming all legal obligations and responsibilities conferring on this point the widest indemnity with respect to any dispute, claim, request for compensation for damages from processing, etc. that may be received by the [Controller](#) 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, such as in the case of a request for assistance in registering for the [Panel Platform](#) or for verification of NFTs issued by 4C ("Provision of Services to All Users").

Processing for this purpose is based on the execution of your request. It is not obligatory to provide [Data](#) to 4C for this purpose, but in default your request cannot be fulfilled.



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 under Article 130, paragraph 4, of the Privacy Code. You may object to the processing of your [Data](#) for this purpose either when requesting products and services (by expressly denying your consent to the processing for Marketing purposes), or during subsequent commercial communications from 4C, by writing to privacy@4clegal.com or via the unsubscribe mechanism found in the footer of the emails you receive.



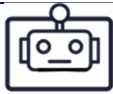
c. to comply with legal obligations and orders to which we are subject, which form the legal basis for the processing of your [Data](#) ("**Compliance with legal obligations**").



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 done on the basis of the Owner's legitimate interest in preventing and detecting fraudulent or potentially unlawful activities and enabling us to defend ourselves in court.



e. to conduct statistical analysis and surveys by means of aggregated data. Such processing is based on 4C's legitimate interest in improving business activities and services offered by means of the platform.



4.
How we use
your Data (how
we process it)

The **Data** collected for the above purposes are processed both manually and in an automated manner, i.e., through programs or algorithms that analyze **Data** inferred from your activities, information about 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 authorized** by us to perform any of the **Data**-related activities described in this **Privacy Policy**, such as our employees and contractors 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 agreements in place 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 information systems and who are therefore able to access, modify, suspend or limit the processing of your **Data**. These individuals have been selected, properly trained, and their activities are tracked by systems that they cannot modify, as required by the regulations of our competent supervisory authority;
- **Police authority or any other authority** whose provisions are binding on us: this is when we must comply with a judicial order or the law or defend ourselves in a legal proceeding.



6.
Where is your
Data 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 strive 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 do we
keep your Data

Your **Data** processed for the:

- **Provision of Services to all users (see sect. 3.a)**: will be kept for the time strictly necessary to achieve those same purposes. Since these are processes 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-in (see sect. 3.b)**: they will be kept, as a general rule, until your objection and for a maximum of 24 months after your last purchase;
- **Fulfillment of legal obligations (see sect. 3.c)**: will be kept as long as required by the specific obligation or rule of law or applicable regulation;
- **Abuse/Fraud (see sect. 3.d)**: will be retained for as long as necessary to achieve those same purposes and therefore until such time as 4C is required to retain it in order to protect itself in court and notify the competent authorities upon the occurrence of an Abuse/Fraud.

For the retention periods applied to Cookies, please see our Cookie Policy.

More information regarding the [Data](#) retention period and the criteria used to determine that period may be requested by writing to the Data Controller at 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. In the latter regard, please note that once the above retention period has expired (including in the event that you exercise your right to erasure under 8 below), your [Data](#) will be backed up for an additional 12 months. You can request further information about our retention policy and criteria by writing to us here: privacy@4clegal.com.



8. How to control your Data and manage your choices

At any time, you can request to:

- access your [Data](#) (**right of access**): we will provide you with your Data, such as your name, age, IP Address, Unique Identifiers, email and expressed preferences, along with the Privacy Policy you received when you provided it;
- exercise your right to portability of your [Data](#) (**right to Data portability**): we will provide you with an interoperable file containing Data about you;
- correct your [Data](#) (**right to rectification**): for example, you can ask us to change your e-mail address or phone number if they are incorrect;
- limit the processing of your [Data](#) (**right to restrict processing**): for example, 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 deletion**): for example, when you do not want your Data to be retained; in this latter regard, we would like to clarify that, even following the processing of your request for deletion, your Data may remain in 4C's backups for an additional 12 months. This is a necessary measure to ensure the security and resilience of the systems and since for technical reasons on backups it is not possible to selectively intervene on individual records of Data under penalty of loss of integrity of the backup itself, the Data shall be kept there in accordance with the backup retention policies applied by 4C and therefore for 12 months. Once this additional retention period has expired, your Data will be permanently deleted from 4C's systems;
- object 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 to proceed with the processing that override your rights, interests and freedoms. You also have the right to object at any time and without justification to the conduct of marketing activities, including by registering with the Register of Objections pursuant to Presidential Decree No. 26 of January 27, 2022;
- revoke your consents (**right to withdraw consent**). You can always revoke your previously expressed consent via the unsubscribe button present in our marketing communications or also in the manner described in this section, without affecting the processing carried out before the revocation of the same. We remind you that pursuant to Presidential Decree No. 26 of January 27, 2022, you may object or revoke your consent to marketing activities by registering with the Register of Oppositions. If you have given your consent to marketing activities in the context of contractual relationships with us or the same have ceased no more than thirty days ago and therefore the Register of Oppositions 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 below.



You may exercise the above rights or express any concerns or complaints about our use of your [Data](#) directly at: privacy@4clegal.com.



At any time, you may also:

- contact our Data Protection Officer ("DPO"), here: dpo@4clegal.com;
- contact the Supervisory Authority, a list of all Supervisory Authorities by country can be found here: 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 any processing performed on the 4C website (www.4clegal.com) nor on the so-called 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 dedicated disclosures for the processing carried out there

10. Changes to the Privacy Policy

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

11. Dedicated sections

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

11.A. Sei un Professionista?



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

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

a. Data collected for the Professional's due diligence required to register for the [Panel Platform](#) and [Third Party Data](#)

To register on the [Panel Platform](#), you will be asked to release certain Data, including: details about your professional policy (expiration date, details, confirmation of premium payment, maximum amount), details about your professional experience, skills gained, contact details, professional domicile, and more generally all work and study experience you have had. In addition, you will be asked to provide a copy of an identity document. This [Data](#) will be processed by 4C for the purpose of verifying its 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 enable you first to be accredited to the Panel Platform and, subsequently, to 4C's Customer Panels, where permitted by them and in accordance with their terms and conditions from time to time. Please note that the copy of the identity document requested during accreditation will be deleted by 4C once the above verifications are completed.

When registering for the Panel Platform, you will be asked to enter your VAT number. In case your VAT number is already associated with a Firm, you will be automatically

linked to the section related to the firm of which you are a member. If, on the other hand, your VAT number is not already associated with a Firm, a master section of the Firm of which you are a member will be created on the platform and, for which, you will be assigned the role of administrator. Through this role you will be able to edit - but not delete - the role associated with the profile of other professionals belonging to your Firm. During registration, you will be able to enter data and information related to the Firm you are a member of, including contact email, indication of the marketing department contact person, and related contact information. Please note that any third party Data and information that you may upload to the platform will be processed by 4C only for the purpose described herein. We also clarify that if you confer Data of third parties to 4C, you will place yourself as an autonomous Data Controller, assuming all the obligations and responsibilities of law. In this sense, you confer on this point the widest indemnity with respect to any dispute, claim, request for compensation for damages from processing, etc. that may be received by 4C from third parties whose Data have been processed in violation of the applicable data protection regulations.

In addition, after you have been accredited to the Panel Platform, 4C may also invite you to be accredited to specific Panels of its client Companies or Legal Departments, if deemed to be in line with your expertise (see the purpose of “Referral to Clients” in section 11.A.3.a of the Privacy Policy); in such cases, you will be free to be accredited as well as to reject the suggestion received.

If you request it by clicking on the “my CV” button present within your profile in panel.4clegal.com platform, we may also process this Data and those 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 client Panels, the Company or Legal Department from which you have requested accreditation will process your Data as an autonomous Data Controller except in specific cases expressly provided for in the individual disclosures that you will find published in each relevant Panel; we therefore invite you to consult the Data Processing Disclosure published therein.

b. Data collected for Track Record validation and Third Party Data (so-called “Track record hub”).

To obtain Track Record validation, you will be able to fill in the dedicated forms by entering details of these skills/assignments/experience. To this end, 4C will contact your client or other individual you have indicated so as to ask for confirmation of the information you have released. Upon successful confirmation by the contact you have provided to us, the Track Record will also be considered validated for the purpose of accreditation to 4C's Client Panels. Please note that third party Data and information will be processed by 4C only for the purpose described herein; please also note that if you confer third party subject Data to 4C you stand as an autonomous Data Controller, assuming all legal obligations and responsibilities. In this sense, you confer on this point the widest indemnity with respect to any dispute, claim, request for compensation for damages from processing, etc. that may be received by 4C from third parties whose Data have been processed in violation of the applicable data protection regulations. We urge you not to provide us with Data relating to criminal convictions and offenses (as per Art. 10 GDPR) or other information relating to your health status, political opinions or religious beliefs (as per Art. 9 GDPR) with respect to you and/or third parties, and we specify 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 called “[Track Record Hub](#),” you will find a dedicated [Data Processing Policy](#), which we encourage you to consult before giving your [Data](#).

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

As part of 4C’s services, there is also one that allows you to attest to the ESGs you own. 4C may invite you to access a dedicated Panel in which you can select the ESG items you want to attest. For their validation, we will ask you to describe the ESG to be validated and attach documentation to substantiate your claims. Here, you may also provide us with information and Data from third parties, such as the identification and contact details of associates in your firm or your clients, whom 4C may contact to validate what you have declared for the release of one or more ESGs. Please note that third party Data and information will be processed by 4C only for the purpose described herein; please also note that if you confer third party Data to 4C you stand as an autonomous Data Controller, assuming all legal obligations and responsibilities. In this sense, you confer on this point the widest indemnity with respect to any dispute, claim, request for compensation for damages from processing, etc. that may be received by 4C from third parties whose Data have been processed in violation of the applicable data protection regulations. We urge you not to provide us with information regarding your health status, political opinions or religious beliefs (referred to in Art. 9 GDPR) with respect to you and/or with respect to third parties, and we specify that, should you decide to give us this Data, we will not be able to process it in any way and therefore we will delete it (for example, for the purposes of validating a parenting policy, we invite you not to provide us with the Contact Data of those who have actually taken maternity leave; or again, in the case of validating a policy on inclusion, we invite you not to provide us with Data of your collaborators or your staff with disabilities).

As mentioned above, this Data may also be used to generate your Curriculum Vitae.



11.A.2 Source of your Data

Your Data may have been given 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 to validate Track Records and ESGs held, as well as in the case of partnerships or new synergies..



11.A.3. Why we collect and process your Data and legal basis for Professionals

In addition to what is stated in sect. 3 of this Privacy Policy, if you are a Professional your Data is used for the following purposes:

- a. to enable you to sign up for and use the Panel Platform, to enable you to accredit to 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 with the Panel Platform or other Companies’ Panels, 4C may analyze your skills and professionalism, including those included in Track Records or Curriculum Vitae, to

- refer you to other Panels so that you can evaluate them and, if appropriate, accredit yourself;
- 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 realize 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 accredit yourself independently of 4C's signal. 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 just "Reporting to Clients"), 4C may process and analyze your Data to better understand your professional experience and qualifications; this evaluation is necessary for Reporting to Clients to be relevant and for you to have a real chance of obtaining one or more professional assignments appropriate to the skills and experience you have described to us.



Processing for this purpose is based on fulfilling your request, contractual and pre-contractual measures as these are all services related to being part of 4C's network. It is not obligatory to provide the Data to 4C for this purpose, but in default it will not be possible to fulfill your request.

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- b. to contact your indicated clients or collaborators in order to validate the Track Record or declared ESG (hereafter "**Validations**").



This processing is based on 4C's legitimate interest in offering a service to its clients to validate the skills held by 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, in doing so, 4C will also cease any further processing of your Data. Should you instead decide to respond to the email you received, 4C will retain your Data, including its validation for as long as the Professional remains enrolled in the Panel Platform.

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- c. to communicate your Identifying and Contact Data, Validated Track Records and ESG Profiles to Companies and from Legal Departments that have purchased from 4C the "4cLegal Directory" service (hereafter "**Directory**") or in the Dedicated Panels to 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 that allows you to have visibility towards potential clients and create partnerships with clients and other Professionals. Processing for this purpose is optional but if you do not release your Data you may reduce your visibility and not join some proposed partnerships.

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- d. to optimize 4C's services and improve the operation of the Panel Platform as well as the services offered to its registered Professionals.



Such processing is based on 4C's legitimate interest in improving and offering ever better services to its clients to the Professionals who are members of 4C's network ("**Optimizing our services to Professionals**"). To object to such processing you can contact us at the addresses indicated in section 8 of this Privacy Policy

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- e. send you promotional communications, surveys and market research on the products and services of 4C or even business [Partners](#) involved from time to time, without in that case sharing Data but only aggregated information. Such communications may be sent to your Contact Data by available automated means (e.g., email, SMS, WhatsApp, unattended telephone, chat bot, pop-ups on the Site) as well as non-automated means (paper mail and telephone with operator) ("**Marketing**").

This processing is based on the consent that you will be able to express through the form present when registering to the Panel Platform or on the various forms present on the 4C website, or even at our events. Please note that the 4C collects a single consent by virtue of the Antispam Guidelines of the Guarantor Authority

but you can revoke it at any time, even for only one or more of the channels indicated, without affecting the lawfulness of the processing carried out before the revocation of the same. 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 via the unsubscribe link found in each of our commercial communications.

The provision of Data for this purpose is optional, and if it is not provided, you will not be able to receive promotional communications; without any consequences to you.



11.A.4. How can we disclose your Data if you are a Professional

In addition to what is stated in sect. 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 legal field so that your profile can be evaluated for the purpose of making 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 that client's Panel;
- **other professionals enrolled in the Panel Platform, or clients of 4C who engage 4C in headhunting or scouting and advisory activities**, to propose the creation of new synergies and partnerships;
- **clients of 4C who have purchased the Directory**, for the purpose of providing such service, who may therefore view your Data as specified in section 11.A.3.c and for the purpose Reporting to Clients;
- **clients/referrers/collaborators or other stakeholders** to attest to the professional skills/experience you have declared for Track Record validation purposes and for ESG validation purposes.



11.A.5. How long we keep your Data if you are a Professional

In addition to what is stated in sect. 7 of this Privacy Policy, if you are a Professional your Data will be retained as represented below.

- For the purposes of Provision of Services to Professionals including Reporting to Clients: in the event that you have not joined any of the Panels of Companies or Legal Departments, your Data will be retained for the time strictly necessary to achieve the above purposes - Provision of Services and Reporting to Clients - and, in any case, until you request to be deleted from the Panel, subject to further retention of the Data for the needs of protection purposes described at the conclusion of this paragraph. Since these are processing operations 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 Italian Civil Code). We also point out that the copy of your identity document requested during the accreditation phase, once the verification of your identity is completed, will be deleted, since this processing is exclusively functional to carry out a due diligence on you.

In the event that you have joined at least one of the Panels of Companies or Legal Directions, the Data will be retained according to the logics described above, that is, for the time necessary to pursue the purposes of processing and, in any case, until the time of your eventual request for cancellation from the Panel. Upon receipt of your cancellation request, 4C - as Data Controller - will deactivate your user profile, ceasing the active processing of your Data, which will no longer be used for the pursuit of the purposes set forth in this Privacy Policy. 4C, as the data controller, will continue to store the Data on behalf of Companies and Legal Departments, providing them with timely notice of your request for deletion so that they can handle it consistently with the processing purposes they have defined as data controllers

- **Validations:** will be kept until you unsubscribe from the Panel Platform;
- **Communication and to Optimize Our Services:** will be retained until you object to such processing in the manner outlined in the How to Control Your Data and Manage Your Choices section;
- **Marketing:** will be kept until you revoke your consent. Purchase Data that are processed for personalized marketing activities are kept for 24 months;

More information regarding the Data retention period and the criteria used to determine that period may be requested by writing to the Data Controller at 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. In the latter regard, we would like to clarify to you that even after the Data retention period applied by 4C has expired, your Data will be retained in backups for an additional 12 months. You can request further information about our retention policy and criteria by writing to us here: privacy@4clegal.com.

11.B.

Are you a company or legal department?



11.B.1. What Data we collect and process if you are a Company/Legal Department

In addition to what is indicated in sect. 2 of this Privacy Policy, if you are a Company or 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

To enable you to use the Panel dedicated to you and/or the 4C Directory, we may collect Identifying and Contact Data of those within your Company or Legal Department who are assigned to use the utilities of these services. Through this Data, in fact, your staff will be able to log in and use the services purchased by your Company or Legal Department.

We specify, however, that within your Panel you will operate as an autonomous Data Controller both with respect to the Data of your employees or collaborators to whom you will provide access as well as with respect to the Data of the Professionals that you will eventually process as a result of their enrollments in your Panel (which may also take place upon your invitation and/or following a referral from us or through their spontaneous application). This is except for those processing activities that we reserve the right to carry out for the purpose of optimization of our services better stated in the contractual documentation signed with you with respect to which 4C acts as Data Controller.



11.B.2. Why we collect and process your Data and legal basis for Companies/Legal Directions

In addition to what is stated in sect. 3 of this Privacy Policy, if you are a Company or Legal Department your Data is used for the following purposes:

- Optimize our services. In particular, 4C reserves the right to analyze your Data in order to improve the operation of the Panel Platform and the Panel dedicated to you ("**Optimizing Services to Companies/Legal Departments**").

Such processing is based on 4C's legitimate interest in rendering ever better services to its customers as well as optimizing 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 do we keep your Data if you are a Company/Legal Department

In addition to what is stated in sect. 7 of this Privacy Policy, if you are a Company or Legal Department your Data processed for the purposes of:

- **Optimize services to Companies/Legal Departments:** will be retained as a general rule until you object, which you may do in the manner indicated in section 8 of this Privacy Policy.

More information regarding the Data retention period and the criteria used to determine that period may be requested by writing to the Data Controller at 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. In the latter regard, we would like to clarify to you that even after the Data retention period applied by 4C has expired, your Data will be retained in backups for an additional 12 months. You can request further information about our retention policy and criteria by writing to us here: privacy@4clegal.com.

12. License

The icons illustrated in this Privacy Policy are "[Data Protection Icons](#)" from [Universit  di Maastricht, European Centre on Privacy and Cybersecurity \(ECPC\) 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 Departments: means 4C customers who have contracted with us to use the services provided on the [Panel Platform](#) by signing the contract on behalf of their Company or public law entity. Our services are often used particularly by Legal and Corporate Departments, so we will also use this term within this [Privacy Policy](#).

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

Cookie: is a small text sent to your [Browser](#) from our site (which hosts 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 a variety of purposes, such as to record your preferences regarding the use of Cookies (Technical Cookies), to analyze and improve our services, and to create new services and features or to personalize our services, including content that may be useful to you. Information transmitted by Cookies is subject to combination and/or cross-referencing with one of the [Other Tracking Technologies](#), where applicable.

Personal Data means 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 e-mail address (if it relates to one or more aspects of an individual), IP Addresses, and Unique Identifiers are considered Personal Data. Hereafter, 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](#). On the [Browser](#), [IP Address](#) and [Cookies](#) are considered Unique Identifiers. On the [Device](#), advertising identifiers provided by vendors, such as Apple's IDFA and Android's AAIG, that we use to analyze 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 opinions of European supervisory authorities, 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](#), [Device](#) to connect to the Internet. The Internet Service Provider provides this number that can 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.

4C's Social Pages: indicates the social network pages used by 4C, specifically those listed at the following addresses: [Instagram](#), [Facebook](#), [LinkedIn](#), [Twitter](#).

Panel: means the individual platforms developed for our clients ([Companies](#) and [Legal Departments](#)) to which [Professionals](#) can accredit.

Partner: this definition includes selected Partners with whom we may share your [Data](#). Partners may belong to the following industries: legal professionals; faculty 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 organization of a 4C event and whose identity will be disclosed at various events; information and communication services; professional and consulting activities; business support services; and 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>) in which you can register to access the services referred to in this [Privacy Policy](#).

Professional: means 4C's professional clients who use 4C's services delivered on the [Panel Platform](#) and who offer their services to 4C's corporate clients through that [Panel Platform](#).

Data Processor or Processor: refers to an entity engaged by us to process your Personal Data solely on behalf of 4C S.r.l. and pursuant to 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 processing your 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 Controllers") to indicate that your Data is processed by an entity other than 4C S.r.l.

Track Record: means the expertise of a Professional in a specific subject of reference among those indicated by 4C or required by [Companies](#) and [Legal Departments](#).
