

NOTICE ON THE PROCESSING OF PERSONAL DATA

Below are the information required by articles 13 and 14 of the Regulation (EU) 2016/679 ("GDPR") on the processing of personal data carried out within the scope of the contractual relationship between the parties, i.e. between the below-specified data controller and its client, whether a legal entity or a natural person.

It is the client's obligation to make this information available to all parties involved in that relationship (e.g., corporate contact persons).

1. Identity and contact details of the data controller

The data controller **VezzDesign S.r.l.**, VAT 01330530195, with registered office in Via Gattamelata n. 41, 20149 - Milano (hereinafter "Data Controller").

The Data Controller can be contacted at the e-mail address info@vezzdesign.it.

2. Categories and sources of data

The data being processed are identifying, contact and job role information.

The data are provided directly by the data subject (such as the client - natural person as well as the legal representative or corporate contact person in the case of client - legal person) or by another person involved in the activities referred to in the contractual relationship (e.g. another corporate contact person).

3. Purposes and legal basis of the processing – data retention period

Purpose	Legal basis	Data retention
Performance of the contractual relationship and, in particular, the provision of the requested service.	The performance of a contract to which the data subject is party (art. 6.1, lett. b) GDPR). With regards to data of employees/collaborators of the client - legal person, the legitimate interest of the Controller and the third party (the client itself) referred to in Art. 6.1, lett. f) GDPR.	Throughout the duration of the relationship and for 10 years thereafter as the ordinary limitation period or period prescribed by law (e.g., of record keeping).
Fulfillment of legal obligation, such as those in taxation and accounting.	Compliance with a legal obligation to which the Controller is subject (art. 6.1, lett. c) GDPR).	
If requested and consented to by the data subject, sending via e-mail of promotional communications regarding VezzDesign's services similar to those covered by previous purchase.	The so-called "soft spam" provided for by art. 130, paragraph 4 of the Italian Privacy Code, which transposes at national level the provisions of Directive 2002/58/EC, art. 13, paragraph 2.	Throughout the duration of the relationship and for 10 years thereafter, without prejudice to the right to object (in the manner specified in par. 5 below).

4. Provision of data

The data are necessary for the execution of the contract; therefore, failure to provide them will make it impossible to enter into and perform such contract.

5. Recipients of the data

The data shall be communicated - for the pursuit of the purpose set out in point 2 of the table in par. 3 above - to the accountant and Financial Authority (Agenzia delle Entrate), who shall process them as autonomous data controllers.

The data may also be processed by other parties, suppliers of the Controller (e.g. in IT or marketing and communication), who process them as data processors, with whom special agreements have been entered into pursuant to Article 28 GDPR.

VezzDesign's employees, who have been expressly authorized for this purpose and have received appropriate operational instructions, are also involved in data processing.

The Controller transfers data outside the EU or the EEA and in particular to the United States, where IT service providers are established, a third country deemed appropriate by virtue of the European Commission Decision of July 10, 2023 - EU-US Data Privacy Framework. Where the Controller also transfers data to entities established in third countries without an adequacy decision, the transfer will be based on appropriate mechanism under Article 46 of the GDPR (in particular, standard contractual clauses).

6. Data subjects' rights

Data subjects may exercise their rights under the GDPR by sending an e-mail to the Controller to the address indicated in par. 1 above. In particular, they have the right:

- to obtain the confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access the data concerning them in accordance with Article 15 GDPR,
- to obtain the rectification of inaccurate data,
- to have incomplete data completed,
- to obtain the erasure of data in the cases provided for by Article 17 GDPR ("right to be forgotten"),
- to obtain restriction of processing in the cases provided for by Article 18 GDPR,
- to object, at any time, on grounds relating to their own particular situation, to the processing carried out in the legitimate interest of the Controller,
- where the processing is based on consent or contract and is carried out by automated means, to receive the data in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from the controller to which the personal data have been provided ("right to data portability");
- to lodge a complaint with the competent supervisory authority in the Member State of their habitual residence, place of work or place of the alleged infringement.