

INFORMATIVE NOTE ON THE PROCESSING OF PERSONAL DATA
Pursuant to art. 13 of the UE Regulation Nr. 2016/679 – GDPR
(protection of persons and other subjects
regarding the processing of data)

**Informative note on the
processing of personal data**
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Experientia Srl in compliance with the provisions of EU Regulation no. "2016/679 (hereinafter, for the sake of brevity, also "the Regulations" or GDPR"), containing provisions for the protection of persons and other subjects regarding the processing of personal data, in the person of **Vanderbeeken Mark Eduard Jozef**, hereafter **DATA CONTROLLER**,

Informs you

that the personal data you provide will be processed in compliance with the aforementioned law and the confidentiality obligations of the professional / firm.

1) Data Controller¹

The data controller is Mr. **Vanderbeeken Mark Eduard Jozef**, located in Turin (IT), Via Cesare Battisti 15.

2) Data Processor²

The data processor is Ms. **Rosso Silvana**, located in Turin (IT), Via Cesare Battisti 15.

3) Data Protection Officer (DPO)³

The data protection officer (DPO) is Ms. **Rosso Silvana**, located in Turin (IT), Via Cesare Battisti 15.

3 bis) the persons in charge (persons authorized to process the data) are (on this point, see the next note 7 to this document for appropriate evaluations)

4) Definition of personal data

Italy

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¹ "The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law".

² A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

³ This is a person who has specialist knowledge of data protection laws and practices: provides assistance to the data controller and data controller, who are required to appoint the DPO in particular situations. "There is an obligation to appoint if:

- the processing is carried out by a public authority or body, except for courts acting in their judicial capacity;
- the core activities of the controller or the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale (the factors that characterize a large-scale treatment, identified by the European guarantors, are: the number of subjects involved in the treatment, in absolute or in percentage terms; the volume of data and their type, duration or persistence of the treatment activity; the geographic scope of the treatment activity)."

The personal data processed are the following:

- personal identification data (personal data, email addresses, etc.)
- genetic data (data revealing racial, ethnic origin, etc.)
- biometric data (this refers to the data relating to the physical, physiological and / or behavioral characteristics that can be deduced from the documentation kept in the Office)
- political opinions (where applicable),
- religious or philosophical convictions (where deducible)
- union membership (where applicable)
- Any other particular data acquired in fulfillment of the mandate conferred.

5) Purpose of the data processing ⁴

The personal data you provide are necessary for the performance of the mandate you have provided.

6) Methods of processing and data retention ⁵

Processing will be carried out in an automated and / or manual form, in compliance with the provisions of art. 32 of the Regulation on security measures, by persons specifically appointed ⁶ and in compliance with the provisions of art. 29 of the Regulations, who will act under the direct authority of the Data Controller and / or the Data Processor ⁷.

It shall be clear that the secretariat, the administrative staff, the employees and the collaborators of the company Experientia Srl have been authorized to process your data.

Please note that, in compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of the Regulations, subject to your consent expressed at the bottom of this statement, your personal data will be kept for the period of time necessary to achieve the

⁴ The GDPR confirms the rule that data processing shall be lawful only if and to the extent that at least one of the following applies (in addition to consent):

- a) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- b) processing is necessary for compliance with a legal obligation to which the controller is subject;
- c) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- d) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- e) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child

⁵ In the case of data retention systems outside the office or in the cloud, it is advisable to contact the IT consultants in order to evaluate the methods of conservation in light of the GDPR.

⁶ "The Data Controller must appoint the authorized subjects and the managers, with specific indication of the tasks delegated to them. Within a company, it may be useful to identify the following figures (which are suggested to identify by function and not with personal data):

- authorized at the reception / secretary (also addressing and training of files)
- authorized to check data
- authorized for registration and possible protocol (if applicable)
- authorized for archiving.

⁷ Anyone having access to the data must be expressly designated as authorized by the for processing (secretariat, administrative staff, colleagues, practitioners, IT manager).

purposes for which they are collected and processed and for the additional period necessary to comply with the regulatory obligations. In particular, the data you provide will be kept for 10 years⁸.

7) Scope of communication and dissemination

The collected data will never be disclosed and will not be communicated without your explicit consent, except for the necessary communications that may involve the transfer of data to public bodies, consultants or other subjects for the fulfillment of legal obligations.

8) Transfer of personal data

Your data is stored on servers located at OVH in France; they will not be transferred either to other EU Member States or to third countries outside the European Union⁹.

9) Special categories of personal data

Pursuant to articles 9 and 10 of the Rules, you could confer, in the course of the relationship of collaboration, data qualifying as "particular categories of personal data" and data that reveal "*racial or ethnic origin, political opinions, religious or philosophical beliefs, or union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data related to health or sex life or to sexual orientation of the person*". These categories of data may be processed only with your consent, expressed in writing at the end of this information.

10) Rights of data subject

At any time, you may exercise, under Articles 15 to 22 of the Rules, the right to:

- a) request confirmation of the existence or otherwise of personal data;
- b) obtain information on the purposes of the processing, the categories of personal data, recipients or categories of recipients to whom the personal data have been or will be communicated and, where possible, the retention period;
- c) obtain updating, rectification and deletion of data;
- d) obtain the treatment limitation;
- e) obtain data portability, ie receive them from a data controller, in a structured format, commonly used and readable by automatic device, and transmit them to another data controller without hindrance;
- f) oppose the processing at any time and also in the case of treatment for direct *marketing* purposes;
- g) to oppose an automated decision-making process concerning individuals, including profiling.
- h) ask the data controller to access personal data and to rectify or cancel them or limit their processing or to oppose their processing, in addition to the right to data portability;

⁸ The storage time must be at least that required by the legislation related to the nature of the documentation.

⁹ The professional must assess whether the data are also stored in a cloud and whether this has its own servers in Italy, or in the European Union or other non-EU state (see note 6 to this). In this regard it should be noted that this document is exemplary and therefore does not take into account the case studies of professionals with their own website with cookies.

- i) withdraw the consent at any time without prejudice to the lawfulness of the treatment based on the consent given prior to the revocation;
- j) propose a complaint to a supervisory authority.

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