

PRIVACY DISCLOSURE

1. What is this document?

On May 25, 2018, the new European General Data Protection Regulation (EU Regulation 2016/679 of the European Parliament and of the Council of April 27, 2016), abbreviated as GDPR, went into effect. In accordance with this document and with the new provisions of law, we have revised our privacy disclosure to give you better support and a more detailed description of how we manage your personal data.

This document is also available online at our website www.cmplawfirm.com on the page: "Rights of Data Subjects". CM&P Studio Legale Associato reserves the right to amend, update, add, or remove portions of this disclosure at its discretion at any time, for example to add new functionalities dictated by technological development or to make changes in compliance with new legal obligations. With regard to the nature of the change, Clients will be informed of these changes through a written communication or through our website.

2. Who is the Data Controller?

The Data Controller is CM&P Studio Legale Associato with headquarters at Via San Raffaele, 1, Milan, in the person of its legal representative. The controller may be contacted at the firm's Milan location.

3. What data do we process?

Data that you provide: we will process some of your personal data, such as your first and last name, the contact data you gave us or that you utilized to communicate with us, such as your email address, postal address, and telephone number, as well as other information about you that you may have provided to us (such as criminal record and criminal status certificates, family status, information on ownership of company shares, stocks and shareholdings and other economic information, profile information provided when registering with our site, etc.). In some cases, we may process data related to your credit card exclusively for the time strictly necessary to make a payment.

Data provided to us by outside parties: we process only data provided to us by outside parties that you have authorized.

Browsing data: during their normal operations, the IT systems and procedures responsible for the functioning of our site acquire certain personal data whose transmission is implicit in the use of internet communication protocols. This is information that is not collected to be associated with identified data subjects, but which by its nature could, through elaboration and association with data held by outside parties, make it possible to identify users. The data category includes remote hosts and thus IP addresses that make it possible to identify the computer, the domain names of the computers utilized by users who connect to the site, the addresses noted through the URI (Uniform Resource Identifier) of the requested resources, the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the response from the server (successful, error, etc.), the web page from which the user is operating, and other parameters related to the operating system and the user's IT environment. These data are processed in anonymous form for the sole purpose of obtaining statistical information on the use of the site (number of users who access the site, in what sequence, time spent on the site, volume of data consulted, etc.) and to identify any system errors, such as false links or programming errors, and thus to make functioning of the site more efficient and improve its usability. In principle, the information acquired and stored in the server log on access and utilization of the site will not be associated with identifiable persons, but the firm reserves the right to verify these data if unlawful dissemination and utilization of the site or any other crime is suspected.

Cookies: the website utilizes what are known as session cookies, which make it possible to transmit session identifying details consisting of random numbers generated by the server, which are necessary for secure and efficient exploration of the site. The cookies utilized are temporary and thus are not permanently stored on the computer, and vanish automatically when the browser is closed. No type of user identifying data is acquired.

Sending the newsletter: if you subscribe to our newsletter, we note, save, and process the data you provide at the time of registration for the newsletter so that it can be delivered. By registering for the newsletter, you agree that it will be sent to the email address you provide. Subscribing to our newsletter takes place manually based on the consent you provide. You may cancel your subscription to the newsletter at any time, and thus withdraw your consent to receiving the newsletter and saving the relative personal data, by sending an email to info@cmplawfirm.com. Your email address will be deleted from our system unless it is lawful to store it due to other needs (with regard to data collection and storage, refer to the following paragraphs).

There is absolutely no provision for an automated decision-making system that utilizes your data.

4. Based on what measure or provision of law do we process your data?

The personal data collected are utilized for the sole purpose of meeting contractual obligations and all other administrative and commercial obligations that arise from such, as well as to assert any

rights arising from the contractual relationship. In addition, the firm utilizes the data to send the newsletter.

CM&P Studio Legale Associato handles your data with the utmost care and is extremely concerned with the privacy of its clients. Therefore, no data will be divulged to outside parties except with your explicit consent.

Nevertheless, your data may be revealed to and processed by other partner firms or business associates, including with offices outside the European Union (with regard to the transfer of data, refer to the following paragraph), only for purposes of meeting contractual obligations. CM&P Studio Legale Associato guarantees that its partners or associates adopt the same strict measures to protect your personal data.

Provision of your data is always optional, but failure to provide them may make it impossible to proceed with certain types of processing, such as those related to compliance with a contract or the provision of services you requested. We use organizational, administrative, technical, and physical security measures to protect your data and to guarantee that they are processed in a timely, accurate, and complete manner.

5. Do we transfer your data to countries outside the European Union?

When we transfer your data to other parties who reside outside the territory of the European Union, we ensure that they are parties for whom “adequacy decisions” have been issued. If this is to countries that do not guarantee an adequate level of privacy, we do it after the outside supplier provides adequate contractual guarantees, based on the Standard Contractual Clauses approved by the European Commission.

6. How long do we keep your data?

Your personal data will be kept only as long as needed for the purposes for which they were collected, provided it is not absolutely necessary to retain them for a longer time, in accordance with the applicable law. Our firm will take all reasonable measures to destroy these data securely or to make them permanently unidentifiable.

7. What are my rights?

Following is a brief explanation of your rights with regard to processing your personal data. You have the right to know what personal data of yours are being processed. In particular, you have the right to access, correct, and delete the data, as well as the right of data portability, the right to limit processing, and the right to oppose processing when certain conditions are met. In addition, when the processing is performed or based on our legitimate interest, you may oppose this at any time.

The *right of access* allows you to obtain confirmation of whether or not CM&P Studio Legale Associato is processing your personal data, and if so, to access these data and the information related to them.

The *right to correct* allows you to change inaccurate personal data regarding you without unjustified delay and, taking into account the purposes of the processing, to supplement incomplete personal data.

The *right to delete* allows you to delete your data without unjustified delay (for example, when your personal data are no longer necessary for the purposes for which they were collected), subject to the exceptions set out in the applicable law (such as when your data must be stored to meet the data controller's legal obligations).

The *right to data portability* allows you, under certain circumstances set out in the applicable law, to receive the personal data that you provided to CM&P Studio Legale Associato in a structured, commonly used format readable by an automatic device. You may transmit these data to another data controller, provided that you have this right under the applicable law, and unless this could harm the rights and liberties of others. The *right to limited processing* allows you, under certain circumstances provided by the applicable law, to limit the processing of your personal data. In these cases, CM&P Studio Legale Associato may continue to process your data only in certain cases, for example to exercise the right of defense or to protect the rights of another person or legal entity.

The *right to oppose processing* allows you, under certain circumstances provided by the applicable law, to oppose the processing of your personal data unless there are countervailing legitimate reasons, rights, or liberties that would permit CM&P Studio Legale Associato to continue the processing. If there are reasons related to your particular situation, you are granted the right to oppose, at any time, the processing of your personal data when this is based on a legitimate interest of CM&P Studio Legale Associato or an outside party. In these cases, CM&P Studio Legale Associato will cease the processing, subject to certain compelling legitimate reasons to proceed with the processing.

You will have the right to *file a complaint with the Personal Data Protection Authority* at any time if you feel you have not received an adequate response from CM&P Studio Legale Associato regarding your rights or if you feel there has been a violation of your rights.

For more information on the processing of your personal data or to exercise your rights, you may contact us by email at info@cmplawfirm.com.

8. Protection of minors?

No data regarding minors are taken unless there is express formal consent from the parent, guardian, or other persons exercising parental authority.

Milan, December 1st, 2020

CM&P Studio Legale Associato