Privacy policy – Contact Us Portal

Notice pursuant to Articles 13 and 14 of EU Regulation 2016/679 (GDPR)

This privacy notice outlines the methods for processing personal data collected through the "Contact Us" section of the website of RSM – Società di Revisione e Organizzazione Contabile S.p.A. The data processing is carried out in accordance with current regulations on personal data protection, particularly EURegulation 2016/679 (General Data Protection Regulation – GDPR) and related national implementing provisions. The aim is to ensure transparency, security, and the protection of the rights of data subjects.

For further details regarding the processing of personal data on the website, please refer to the site's general privacy policy at <u>Privacy Notice</u>.

1. Data Controller

The personal data referred to in this notice are processed by **RSM** – **Società di Revisione e Organizzazione Contabile S.p.A.** (hereinafter "**RSM**" or the "**Data Controller**"), VAT no. IT01889000509, with registered office at Via San Prospero 1, 20121 Milan, Italy.

For any inquiries regarding this privacy notice, you may contact the Data Controller at: <u>privacy@rsmitaly.com</u>

The Data Controller has appointed a **Data Protection Officer (DPO)**, who can be contacted for any matters concerning the processing of personal data at: <u>dpo@rsmitaly.com</u>

Purpose	Legal Basis	Data Categories	Retention Period
a) Responding to information requests submitted via the contact form or for sending brochures	Performance of pre-contractual measures at the data subject's request (Art. 6(1)(b) GDPR)	phone number, message	Time needed to respond and up to 6 months from data collection
b) Sending marketing and promotional communications	Data subject's consent (Art. 6(1)(a) GDPR)	Name, surname, email, phone number	Until consent is withdrawn or for up to 24 months

2. Purpose, Legal Basis, Categories of Data

regarding products and services by email, SMS, or other electronic means		
c) Sharing data with RSM network companies for marketing purposes	consent (Art.	Until consent is withdrawn

3. Nature of the Data Provision

Providing personal data for purpose (a) is **mandatory**; failure to provide such data will prevent RSM from responding to the request or from sending brochures. Providing data for purposes (b) and (c) is **optional**; refusal will not affect the ability to receive responses to information requests.

4. Source of Data

The personal data processed are provided directly by the user through the contact form on the website's "Contact Us" portal. No data are collected from public sources or third parties without prior notice and consent.

5. Processing Methods

Personal data are processed using manual, digital, and electronic tools strictly aligned with the stated purposes, in a way that guarantees security, confidentiality, and respect for fundamental rights and freedoms.

Only authorized personnel within RSM (pursuant to Article 29 of the GDPR) will have access to the data, along with professionals working with or under the authority of RSM.

6. Recipients of the Data

Personal data may be disclosed, within the limits of the purposes stated above, to:

- IT service providers and marketing communication platforms;
- Other companies within the RSM network for website management and related services;
- RSM network companies, with the data subject's prior consent, for marketing purposes;

• Competent authorities, in compliance with legal obligations.

Third parties processing data as Processors have signed specific data processing agreements with RSM act independent Controllers under or as their own privacy notices. A list of Data Processors is available upon request from the Data Controller. RSM takes appropriate measures to ensure that all third parties involved comply with GDPR-level security standards and process data solely for the defined purposes.

7. Data Transfers Outside the EU

Personal data may be transferred to RSM network entities located outside the European Union. Such transfers are carried out in compliance with Articles 44 et seq. of the GDPR, using appropriate safeguards such as Standard Contractual Clauses (SCCs), Binding Corporate Rules (BCRs), or specific derogations under Article 49 GDPR, where applicable. More information Controller. is available by contacting the Data

8. Data Subject Rights (Articles 15–22 of the GDPR)

Under Articles 15-22 of the GDPR (UE 2016/679), data subjects have the right to:

- Access their personal data (Art. 15);
- Rectify inaccurate or incomplete data (Art. 16);
- Erase personal data under certain circumstances ("right to be forgotten," Art. 17);
- **Restrict** processing in legally provided situations (Art. 18);
- **Data portability** receive data in a structured, commonly used, machine-readable format and, where technically feasible, have it transmitted to another controller (Art. 20);
- **Object** to processing based on legitimate interest (Art. 21);
- **Not be subject to automated decision-making**, including profiling, except where provided for under the GDPR (Art. 22);
- Withdraw consent at any time without affecting the lawfulness of prior processing (Art. 7(3)).

Data Subjects have the right to lodge a complaint with the **Italian Data Protection Authority (Garante per la protezione dei dati personali)** or with another competent supervisory authority in the EU (Art. 77 GDPR), and to seek judicial remedy (Art. 79 GDPR).

To exercise their rights, Data Subjects can contact the Data Controller using the contact details provided above.

9. Privacy Policy Updates

This privacy notice may be subject to changes or updates, particularly following regulatory changes or modifications in the services offered. Any updates will be communicated through appropriate channels, including the website, and will become effective <u>upon</u> publication.