

Awair srl

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Privacy Policy concerning the processing of personal data pursuant to articles 13-14 of (EU) Regulation 2016/679

Data subject: Reference persons at client companies.

Awair srl in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

Purposes and legal base of the processing: your data will be processed for the following purposes necessary to comply with contractual or pre-contractual obligations:

- Consulting activities;
- Clients management;
- Report management during sales operations;
- Proposal of new services to already acquired customers;
- Activities schedule;
- statistical and psychometric analysis;
- Talent Acquisition;
- Talent Development, Coaching & Training.

Processing procedures. Your personal data may be processed by the following ways:

- using electronic calculators running softwares managed by third parties;
- Using electronic calculators running self-managed softwares or directly engineered;
- creating professional profiles or relating to candidates;
- data collection through aptitude tests.;
- Manual personal data processing with paper filing system;
- contract data processing by third parties;
- computer processing.

All data are processed in compliance with the procedures specified in articles 6 and 32 of the GDPR and with the adoption of the appropriate security measures required.

Your data will only be processed by staff specifically authorised by the Data Controller, and specifically by the following categories of staff:

- Administration office;
- Awair's Partners;
- Back Office;
- Marketing office.

Disclosure. Your data may be disclosed to external entities for the correct management of the relationship and specifically for the following categories of Recipients, including all the duly designated Data Processors:

- consultant and freelance professionals, also working as firms;
- sub-contractors.

Distribution: Your personal data will not be distributed in any way.

Your personal data may also be transferred, only for the aforesaid purposes, to the following countries:

- EU countries: in accordance with the Microsoft Volume Licensing Services Agreement, Awair S.r.l. will use Microsoft's online services to store data (OneDrive for Business, SharePoint, Office 365, ...), in this situation Microsoft will store the following Company Data at rest only within the European Geographic Area: (1) the contents of the Exchange Online mailbox (body of the e-mail message, calendar entries and content of e-mail attachments), (2) the contents of the SharePoint Online site and the files stored on that site, (3) the uploaded files on OneDrive for Business and (4) the content of projects uploaded to Project Online. Microsoft's GDPR policy is available at <http://www.microsoftvolumelicensing.com/Downloader.aspx?documenttype=OST&lang=Italian>;
- The DPA Mailchimp in point 6 regulates the potential foreign transfer of personal data to the United States on the basis of Standard Contractual Clauses. Then the transfer takes place in compliance with the provisions in Chapter V of the GDPR and precisely in Article 45 par. 1 and 46 par. 2 lett. c);
- United Kingdom: in accordance with the contract for the use of PSI Group services in order to comply with contractual obligations and related purposes and subject to the limits and conditions provided for by art. 44 and ss. of EU Reg. 2016/679. The data will be transferred according to Article 44 - General principle for the transfer; Article 45 - Transfer on the basis of an adequacy decision, specifically the data will be transferred to the United Kingdom, which from midnight on January 31, 2020 is no longer formally an EU member state. The transitional period began from that date. This period, limited in time, was agreed in the framework of the Withdrawal Agreement between the European Union and the United Kingdom which provides for the application of Union law to the latter, including the provisions of the 2016 EU Regulation / 679 relating to data protection, until 31 December 2020. If, on the other hand, they must be transferred to third countries without an adequacy decision by the Commission, this will take place on the basis of standard contractual clauses in compliance with art. 46 - Transfer subject to adequate guarantees, paragraph 2 points c) and d).;
- United States: in accordance with the contract for the use of the Hogan and PSI Group services in order to comply with the contractual obligations and related purposes and subject to the limits and conditions provided for by art. 44 and ss. of EU Reg. 2016/679. The data will be transferred according to Article 44 - General principle for the transfer; Article 45 - Transfer on the basis of an adequacy decision, specifically the data will be transferred to third countries international organizations for which the Commission has intervened with an adequacy assessment. If, on the other hand, they must be transferred to third countries without an adequacy decision by the Commission, this will take place on the basis of standard contractual clauses in compliance with art. 46 - Transfer subject to adequate guarantees, paragraph 2 points c) and d).

Data Storage Period. In accordance with the principles of lawfulness, limitation of purpose and minimisation of data, pursuant to art. 5 of the GDPR, the data storage period for your personal data is:

- In compliance with the terms prescribed by law for the type of activity and in any case until the withdrawal of consent or until the exercise of the right of opposition pursuant to the Provv. general of 05/15/13; art. 21 EU Reg. 2016/679.;
- set for a timing not larger than the one which implies its purpose achievement, given the aim to collect data, and collected and processed for the execution and fulfillment of contract purposes.

Data Controller: the Data Controller, as defined by the Law, is Awair srl (Via Guido Cavalcanti, 5 , 20127 Milano (MI); VAT no.: 07830500968; contactable as follows: E-mail: info@awair.eu) in the person of Gianfranco Gennaro.

The Data Protection Officer (DPO) designated by the Data Controller pursuant to art. 37 of the GDPR is:

- Jaera S.r.l. nella persona del Dott. Gianrico Gambino (Piazza della Repubblica, 32 , 20124 Milano (MI); VAT no.: 10557200960; contactable as follows: E-mail: dpo@awair.eu).

You are entitled, by application to the Data Processor, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

You may also examine whenever you like the updated version of the present report by connecting to the following web site <https://www.privacylab.it/informativa.php?19083420592&lang=en>.

Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.

2. The data subject has the right to be informed of:

- a. the source of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied if the data are processed by electronic devices;
- d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;
- e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

- a. the updating, rectification or, where interested therein, integration of the data;
- b. the erasure, anonymisation or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
- c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
- d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.