

## **INFORMATION PURSUANT TO ART. 13 OF REGULATION NO. 2016/679/EU (THE "GDPR")**

**HN Excellence S.r.l. ("HN Excellence")** provides consultancy services relating to information and communication technologies (the "**Business**"). HN Excellence, during the ordinary course of its Commercial Activity, comes into contact with, uses and therefore processes personal data of subjects appointed by HN Excellence's client/partner/supplier companies (the "**Referrals**") to whom, hereby, it provides information pursuant to art. 13 of the GDPR.

### **1. CATEGORIES OF PERSONAL DATA AND PURPOSES OF PROCESSING**

**HN EXCELLENCE**, pursuant to art. 6 lett. b) of the GDPR, **WILL PROCESS THE PERSONAL DATA OF THE CONTACT PERSONS** (name and surname; e-mail; duties of the contact person; company mobile number, if any) **EXCLUSIVELY TO CONCLUDE THE CONTRACT WITH THE COMPANY WHERE THE CONTACT PERSON WORKS AND/OR TO CONCLUDE THE CONSULTANCY CONTRACT WITH THE CONTACT PERSON AND/OR TO EXECUTE PRE-CONTRACTUAL MEASURES ADOPTED AT THE REQUEST OF THE CONTACT PERSON. THE PROCESSING OF THE CONTACTS' DATA IS NECESSARY FOR THE CARRYING OUT OF HN EXCELLENCE'S COMMERCIAL ACTIVITY, OTHERWISE ANY CONTRACTUAL OR PRE-CONTRACTUAL RELATIONSHIP WITH THE COMPANY WHERE THE CONTACT CARRIES OUT HIS/HER WORK WOULD NOT BE POSSIBLE.**

### **2. TREATMENT METHODS**

**HN EXCELLENCE**, for the same purposes and/or in any case for strictly functional purposes, could communicate the data of the Contact Persons to other companies belonging to the same Group and/or to third parties, who will be previously appointed by **HN EXCELLENCE** data controllers pursuant to art.28 of the GDPR. These subjects will carry out or provide specific services such as: accounting; overall processing relating to payments, invoicing, administration, accounting etc.

**HN EXCELLENCE** will process the personal data of the Contact Persons with suitable manual procedures or with electronic tools in accordance with the principles of correctness, lawfulness, minimization, transparency and protection of data confidentiality in compliance with the obligations established by laws, regulations or European Union legislation.

**HN EXCELLENCE** will retain the personal data of the Contact Persons for the time necessary to carry out the Commercial Activity as well as for a subsequent period as long as needs persist, even instrumentally related to the Commercial Activity and in any case as long as the Contact Person continues to carry out the same tasks at the client/partner/company suppliers with whom **HN EXCELLENCE** maintains commercial relationships. Anyway **HN EXCELLENCE** will not, under any circumstances, transfer the personal data of the Contact Persons to a third country or an international organization.

### **3. RIGHTS OF REFEREES**

The Contact Persons, pursuant to art. 15 et seq. of the GDPR, they will be able to exercise, at any time, their rights towards **HN EXCELLENCE** as well as request confirmation whether or not their data is being processed, and if so, obtain access to such data and the following information: a) purpose of the processing; b) categories of personal data processed; c) the recipients or categories of recipients to whom the personal data have been or will be communicated; d) when possible, the envisaged data retention period or, if this is not possible, the criteria used to determine this period; e) the existence of the right to request rectification or deletion of their personal data or the limitation of the processing of personal data concerning them or to object to their processing; f) the right to lodge a complaint with a supervisory authority; g) if the data are not collected from the Contact Persons, all

available information on their origin; h) the existence of an automated decision-making process; i) copy of the personal data being processed (if further copies are requested, and provided that it does not harm the rights and freedoms of others, **HN EXCELLENCE** may charge the Contacts a reasonable expense contribution based on administrative costs. The information will be provided in a commonly used electronic format, unless otherwise indicated by the Contact Persons). Furthermore, the Contact Persons will have the right to obtain: a) updating, rectification or, when there is interest, integration of the data; b) the cancellation, transformation into anonymous form or block of data processed in violation of the law, including those whose conservation is not necessary in relation to the purposes for which the data are been collected or subsequently processed; c) the attestation that the rectification or cancellation operations have been brought to the attention, also with regard to their content, to any recipients of the data, except in the case in which this fulfillment proves impossible or involves a manifestly disproportionate use of means with respect to the protected right; d) the right to data portability, i.e. to request that your data be transmitted, if technically possible, to another data controller; e) to oppose, in whole or in part, for legitimate reasons, the processing of their personal data, even if pertinent to the purpose of the collection.

#### **4. CONTACT DETAILS**

The data controller is HN Excellence S.r.l., with registered office in Viale dell'Oceano Pacifico 66 – 00144 Rome (IT), registered in the Rome companies register, Fiscal Code. and VAT number 14357461004, R.E.A. number 1514967, Capital €. 10,000.00, i.v. To exercise the rights mentioned above, the Contact Persons must send their request to the email address: [hnexcellence@legalmail.it](mailto:hnexcellence@legalmail.it)

HN Excellence has appointed a Data Protection Officer pursuant to art. 37 of the GDPR. The Data Protection Officer is the lawyer. Debora Staglianò can be contacted at the pec address: [privacy@humanativaspa.it](mailto:privacy@humanativaspa.it)