

Privacy Policy (General Information) – E4SMA S.r.l.

EU General Data Protection Regulation (GDPR)

Rev. 16/07/2018

Privacy Statement

We are committed to protecting and respecting your privacy. We ensure the compliance with applicable data protection law (EU General Data Protection Regulation (GDPR)) and other national-specific data protection laws in cooperation with our trusted business partners and collaborators.

This Privacy Statement will inform you how we use personal data to provide our services around the world.

Data management

This Privacy Statement describes the basis on which E4SMA srl ("we", or "us"), as the data controller, processes personal data about visitors of our website and about support staff working on our projects as well as other third parties ("you" or "your").

If you have questions regarding this Privacy Statement or you want to let us know about our website or other information related to our data management practices, please contact us at: privacy@e4sma.com

You may also write us at: E4SMA srl, via Livorno 60 - Environment Park, 10144 Torino (Italy).

Personal data processing

We may collect and process personal data when providing our services. Personal data may be collected from the following ways:

- voluntary: personal data provided by you (e.g. personally or via e-mail or telephone);
- secondary: personal data collected from other sources (e.g. references, LinkedIn and other job platforms);
- automatically: collection of "technical information" in relation to services provided on our website (e.g. Cookies).

Personal data we collect and process may include the following:

- identification data (first name, last name, title(s), gender, address, date of birth)
- contact details and communication data (e-mail, telephone, messages, notes and type of enquiry)
- geographical data (country of residence or employment)
- information about your organisation (as provided by you, e.g. name, type)
- CV and supporting documents (such as identification and contact data, professional experience including present position, education, qualifications, degrees and certificates, experience in the region, language and other skills)
- fee rates
- project implementation data (scope, time, participants, reports, communications, etc.)
- any other information, documentation or communications that you voluntarily submit to us.

If you provide us with personal data of third parties in specific circumstances (for example by way of an email recommending such third party attaching their CV), we assume that you have obtained the consent of such third party and that such disclosure is in accordance with applicable data protection law.



Purposes of the processing

We may process personal data for the purpose of:

- communicate with you,
- process an order,
- preparing tenders for development consulting projects,
- implementing the projects,
- maintaining a network of qualified experts in order to contact them for future projects.

For the above mentioned purposes we process personal data only in compliance with applicable data protection laws. For any, not strictly necessary, processing activities we will explicitly ask for your consent (Art 6 para 1 lit a GDPR).

Data storage

We store "personal data" on our computer data storage server located in Italy in secure and controlled environment. As for the information collected via our website, you can refer to the specific "privacy policy of <u>www.e4sma.com</u>" (link placed in the footer of the webpage).

We implement commercially reasonable physical, administrative and technical protections to help us secure the confidentiality, and integrity of your personal data and prevent the loss, misuse, unauthorized access, unauthorized interception, or information alteration.

We will only store your personal data as long as there is a legitimate purpose for such storage. Where we no longer need to process your personal data for the purposes set out above, we will delete your personal data from our systems. Where permissible, we will also delete your personal data on your request.

Your rights

If we are going to use your personal information in a manner different from that stated at the time of collection, we will notify you, and you will have a choice as to whether or not we can use your personal data in such a way. Moreover, where processing is based on your consent, you have the right to withdraw your consent at any time with effect for the future. This will not affect the lawfulness of processing based on consent before its withdrawal.

Cookies and hyperlinks

We may use cookies to improve the use and functionality of our website and to analyse the use of our website. If you want to block future cookies being placed on your device, you can change your browser settings to do this.

Our website may contain hyperlinks to websites controlled by parties other than us. E4SMA is not responsible for and does not take or accept any responsibility over the contents or use of those websites.

Changes and updates

From time to time we may update this Privacy Statement to reflect changes in our privacy management practices. The date of this page indicates when we last revised the Statement.

Your continued use of our website or engagement in the interactions with us after we implement such changes will constitute your affirmative consent to the revised Privacy Statement.