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CIRCULAR IN ACCORDANCE WITH THE ART. 13 OF THE REGULATION (UE) 2016/679

Dear Customer,

for your information IDEAWORK Srl, with offices in Via San Quintino, 41 - Turin (TO), wish to advise you that as "Data Controller" of the treatment informs you about how your data is processed by the Company in relation to the activities defined by contract and related request for information through our contacts (email, telephone, etc.), in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural person about the processing of personal data and related implementing legislation (hereinafter together as the "**Regulation**").

1. The data concerning you are those:

- a) collected during telephone / IT contact with our Company
- b) supplied following a contract with our Company

2. Your data may be processed for the following purposes:

- a) direct exclusively to the fulfillment of contractual obligations, as well as for information relating to requests by the person concerned to supplies and services.
- b) connected to the obligations provided by laws, by regulations and by community legislation as well as by instructions given by authorities authorized to do so, by supervisory and security services, as well as tax and accounting obligations;
- c) sending commercial or promotional communications on our part, also relating to services different than those already from you purchased;

The legal basis for the processing of personal data is the execution of a contract for the purposes referred to in letters 2a) and 2b), and your consent for the purposes referred to in letter 2c).

3. If you believe that you do not give your consent for the purposes defined in points 2a) and 2b), it will be impossible to continue the relationship.

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The provision of data is optional regard to the purposes indicated in letter 2c). Any refusal to provide data for the purposes referred to in paragraph 2c), will not entail any consequence, except for the impossibility of being informed about any marketing and promotional-advertising initiatives by the Company, as well as receiving commercial communications of His interest.

4. In relation to the purposes set out in point 2 above, the data will be processed by the Company using paper, computerized and telematic means with logic strictly related to the purposes themselves and, in any case, in a way as to guarantee the security and always in full compliance with the legislation in force concerning the protection of personal data. In particular, we inform you that your data are:

- processed lawfully, correctly and transparently;
- collected for the purposes specified above, explicit and legitimate, and subsequently processed in a way that is not incompatible with these purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization');
- exact and, if necessary, updated, deleted and / or rectified;
- kept in a form that allows its identification for a period of time not exceeding the achievement of the purposes for which they are processed;
- processed in such a way as to ensure adequate security of personal data, including protection, through appropriate technical and organizational measures, unauthorized or unlawful processing and accidental loss, destruction or damage.

All the aforementioned data will be retained for the accomplishment of any legislative requirements, for a minimum of 10 years from the termination of the contract and in compliance with the legal obligations relating to data retention times (tax assessments and terms of provision for proof of rights).

5. The categories of data collected are as follows:

- a) personal identification data (personal data, tax code or VAT number, identification documents) strictly related to the management of relationships with customers and suppliers

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(eg fulfillment of tax and accounting obligations, management of activities and services provided on the basis of obligations arising from the contract, etc. ...).

The category of particular data is also included, as per art. 9 of EU 2016/679 Regulation, exclusively for the fulfillment of legal obligations.

6. In order to execute the contract, your data will be processed by the employees of the Company who have access to them due to the functions performed (for example, Administration, Commercial, etc.).

The Company may also communicate your personal data to third parties employed to ensure the provision of services (including external professionals) with reference only to the data strictly necessary to ensure the provision of the services.

These subjects will have access to the personal data necessary to perform the related functions (and can not use them for different purposes), will be required to process the data in accordance with applicable law, will be responsible for processing appointed by IDEAWORK S.r.l. and will be included in an updated list, available at IDEAWORK S.r.l.

Except for the foregoing, your personal data will not be disclosed to other third parties or otherwise disseminated. Your personal data will be stored on servers available to companies located in the European Union, and will in no way be transferred to countries located outside the European Union.

7. Any data eventually collected and processed with your consent for the purposes indicated in letter 2c), will be stored according to the timelines defined previously or until the person involved revokes the consent to receive communications as indicated in point 2c) from part of IDEAWORK Srl or request the deletion of their data, except for the exceptional need to preserve data to defend the rights of IDEAWORK S.r.l., in relation to disputes in force at the time of the request, or on the indication of the public authorities.

8. In accordance to articles from 15 to 22 of the Rules, you have the right to: a) obtain the cessation of treatment in cases where your personal data are processed for direct marketing purposes, also in relation to services identical to those already provided by our Company (so-called right of opposition); b) obtain information in relation to the purposes for which

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personal data are processed, to the period of processing and to the subjects to whom the data are communicated (so-called right of access); c) obtain the correction or integration of inaccurate personal data concerning you (so-called rectification right); d) obtain the cancellation of personal data concerning you in the following cases (I) the data are no longer necessary for the purposes for which they were collected; (II) You have withdrawn your consent to the processing of data if they are processed on the basis of your consent; (III) You have objected to the processing of your personal data in the event that they are processed for our legitimate interest; or (IV) the processing of your personal data does not comply with the law. However, we point out that the storage of personal data by IDEAWORK S.r.l. is lawful if it is necessary to allow it to fulfill a legal obligation or to ascertain, exercise or defend a right in court (so called right of cancellation); e) to obtain that the personal data concerning you are only stored without any other use being made of them in the following cases (I) You dispute the accuracy of personal data for the period necessary to enable us to verify the accuracy of such data personal; (II) the processing is unlawful but you still oppose the cancellation of personal data on our part; (III) personal data are necessary for the assessment, exercise or defense of a right in court; (IV) You have opposed the processing and are awaiting the verification of the possible prevalence of our legitimate reasons to the treatment with respect to yours (so-called limitation right); f) receive in a common format, readable by an automatic and interoperable device, personal data concerning you, if they are processed by contract or on the basis of your consent (so-called portability). Finally, we remind you that you have the right to contact the Personal Data Protection Authority (Piazza di Monte Citorio No. 121, 00186 Rome), in order to assert your rights in relation to the processing of personal data.

At any time, you may decide not to receive commercial communications for the purposes referred to in point 2 lett. c) without prejudice to the lawfulness of the processing. You can make the communication by sending an email to privacy@ideawork-design.com

9. The Data Controller of personal data is IDEAWORK S.r.l., with offices in Via San Quintino, 41 - Turin (TO). The Data Controller can be contacted for requests or reports at the following addresses: privacy@ideawork-design.com

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By writing to the same address, you may exercise the rights indicated in paragraph 8 of this Information.

10. IDEAWORK S.r.l. uses technical and profiling cookies in order to collect and access information stored on your device. For more information, please visit the extended information on the use of cookies available on the site.

Please, return a signed copy of the present document in acknowledgement and acceptance. In case no signed document is received within 15 days, the above will be tacitly considered as approved and accepted.