

SITE INFORMATION

pursuant to Art. 13 Regulation (EU) 2016/679 (GDPR) on the processing of personal data

With this notice, the ABCPP Law Firm wishes to explain to all interested parties what information it collects in the course of the relationship.

DATA CONTROLLER.

The data controller is the individual professional who is part of the ABCPP law firm with its registered office at Via Luigi Razza, 3, 20124 Milan, who can be contacted by email at the following address: info@studiolegaleabpp.eu

The professionals in the firm are:

-Andrew Arreghini, who can be contacted by email at the following address: andrea.arreghini@studiolegaleabpp.eu

-Dr. Anna Bono, who can be contacted by email at the following address: anna.bono@studiolegaleabpp.eu

-Mr. Costantino Cutolo, who can be contacted by email at the following address: costantino.cutolo@avvcutolo.it

-Mr Nicola Papagni, who can be contacted by email at the following address: nicola.papagni@studiolegaleabpp.eu

-Mr. Carlo Patellani, who can be contacted by email at the following address: carlo.patellani@studiolegaleabpp.eu

In this capacity and with reference only to its customers and/or suppliers (or potential customers), as well as its employees or collaborators, the individual lawyer decides which personal data to process, by what means and for what purpose.

ONLINE DATA PROCESSING

LEGAL BASES, PURPOSE AND STORAGE.

All processing must be founded on an appropriate legal basis, taking into account the purposes for which personal data are processed.

Processing	Purpose of the processing activity	Legal Basis	Period Conservation
1 Website	The firm's website is in fact a showcase site in which no data are requested from users, only the personal and contact details of the members of the ABCPP law firm are published. The site does not use cookies.	Consent.	The Holder's data are stored on the site until the Holder's consent for such processing is revoked.

OFF-LINE DATA PROCESSING

1. CUSTOMERS AND SUPPLIERS

LEGAL BASES, PURPOSE AND STORAGE.

All processing must be founded on an appropriate legal basis, taking into account the purposes for which personal data are processed.

The following table is intended to represent in a clear and concise manner the purposes and legal bases of the processing operations carried out in the course of the relationship with CUSTOMERS and SUPPLIERS

Processing	Purpose of the processing activity	Legal Basis	Period Conservation
1 Management of pre-contractual requests	First contact may be made by telephone or by email. In the event that the Interested party does not become a customer, the relevant registry is not created.	Pre-contractual measures at the request of the data subject. At this stage, the Controller may already come into possession of some sensitive/particular data that will be processed on the basis of the exception of referred to in Article 9(2)(f) of the GDPR.	1 year after termination of the processing (unless the Data Subject becomes a customer).

2 Management of Customers and Suppliers	For both Customers and Suppliers, the company accounts are managed by archiving invoices and sending them to the respective stakeholder. Moreover, in the course of their duties, each lawyer in the ABCPP Law Firm files a number of documents and court documents containing personal and sensitive data of their clients. These documents are filed both in paper and computer format and access to them is regulated by an internal agreement between the members of the firm. With regard to electronic invoicing, the Controller uses software in the Cloud.	Fulfilment of contractual and legal obligations. The Controller may come into possession of some sensitive/particular data that will be processed on the basis of the exception in Article 9 co 2.f) of the GDPR.	10 years after termination of treatment.
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TYPE OF DATA PROCESSED

For the management of pre-contractual relations, the Lawyer shall process the contact data of the data subject or of his/her contact person. In some cases, the lawyer may, already at this stage, come into possession of special/sensitive data (such as data relating to criminal convictions, health data, data related to life or sexual orientation) and in general of all data that you have freely provided.

For fiscal management and for the provision of the requested services, the Controller shall process the personal and contact data of the data subject or his contact person, in addition, the Controller shall also process the data required for billing purposes and the special/sensitive data freely provided by the data subject.

CONSEQUENCES OF FAILURE TO PROVIDE DATA

You are in no way obliged to provide us with your personal data.

However, the provision of data functional to the processing operations indicated above in numbers **1 and 2** is necessary to enable us to establish the contractual relationship and/or to fulfil obligations and/or to satisfy a request of yours, even if of a pre-contractual nature. Such processing does not require your consent, but any refusal to provide such data will make it impossible for you to continue with your mandate as lawyer.

2. CV EVALUATION

LEGAL BASIS AND PURPOSE.

All processing must be founded on an appropriate legal basis, taking into account the purposes for which personal data are processed.

The following table is intended to represent in a clear and concise manner the purposes and legal bases of the processing operations carried out in the course of the existing relationship with the CANDIDATES.

Purpose of Processing	Description of activity	Legal basis processing of personal data	Legal basis processing 'sensitive' data
CV evaluation and personnel selection	The Controller, when materially receiving CVs (by email), invites the candidate to read the relevant notice on the site.	Pre-contractual obligations as well as Art. 111bis Legislative Decree 196/03.	The general authorisation of the Garante Privacy (Order No. 146 of 5.06.19) applies to the processing of special categories of personal data, also acquired in the case of spontaneous curricula.

TYPE OF DATA PROCESSED.

In order to be able to assess your **application**, as well as in order to establish the working relationship or collaboration, for the exact qualification of which please refer to the contract between the parties, the Controller shall collect your personal and contact data.

CONSEQUENCES OF FAILURE TO PROVIDE DATA.

You are in no way obliged to provide us with your personal data.

However, the provision of data for the processing indicated in the table above is necessary to enable us to comply with your specific request. Such processing does not require your consent, but your refusal to provide such data will make it impossible for us to process your application.

DATA RETENTION PERIOD OR CRITERIA.

Your data will be kept for as long as necessary to pursue the purposes stated above.

CV data will be kept for 6 months (unless you are hired).

TO WHOM WE COMMUNICATE DATA

Exclusively for the above-mentioned purposes, your data may be transmitted to:

PERSONS AUTHORISED TO PROCESS DATA: these are internal figures, specifically the Controller's employees and collaborators, who collect or process your data by reason of the tasks and according to the profiles assigned to them.

PERSONS IN CHARGE OF PROCESSING: these are third-party collaborators who process data on behalf of the Data Controller, through the conclusion of a special agreement appointing them as Persons in Charge, by means of which the operations delegated to the third party are defined, as well as the security measures to be taken by the latter in order to protect the information it obtains from the Data Controller in the best possible way. In particular, they may process your data:

- External professionals such as an accountant or labour consultant.
- Hosting service for email and cloud storage (Microsoft's online Exchange).
- Cloud-based electronic invoicing service (DATEV KOINOS s.r.l.).
- The third-party law firm appointed as domicile, if any.
- The other professional members of the ABCPP Law Firm.

RECIPIENTS: are those who receive communications of personal data from the Controller, but who, following such communication, act as autonomous Controllers. These include:

- Banks or credit institutions;
- Insurance companies in the event of liability; Judicial Authorities and/or Public Security Authorities, in cases expressly provided for by law;
- Social security agencies, PAs and occupational doctors;
- Insurance companies and Inail.

In any case, your data will not be transferred to countries outside the EU without your explicit consent or in the absence of the guarantees provided for by the GDPR (adequacy assessments, signing of standard clauses, etc.).

The list of third parties appointed as Data Processors is available to Clients and Suppliers at the Firm, and may be shown to Data Subjects upon request.

RIGHTS OF THE DATA SUBJECT

You will always have the right to obtain confirmation from the Data Controller as to whether or not personal data concerning you are being processed and, if so, to obtain access to the personal data and information specified in Article 15 GDPR.

Furthermore, you have the right to obtain the rectification, erasure and restriction of the processing of your personal data held by the Controller. Finally, you have the right to lodge a complaint with the supervisory authority of the Member State where you reside/work or where the alleged infringement took place.

In witness whereof
Law Firm ABCPP