

PRIVACY NOTICE FOR CORPORATE CLIENTS

PROMOSFERA S.R.L.

(pursuant to Regulation (EU) 2016/679 – GDPR)

This privacy notice is provided by Promosfera S.r.l., with registered office in Casorate Sempione (VA), Via XXV Aprile 56, 21011, VAT no. 02250050024, in its capacity as Data Controller (hereinafter, “Promosfera” or “the Company”).

For any matter relating to the processing of personal data, Promosfera may be contacted at the following email address: info@promosfera.com, tel. 338 3100115.

1. SUBJECT MATTER OF THE PROCESSING

This privacy notice concerns the personal data of natural persons acting on behalf of corporate clients (companies, entities, organisations), whose data are collected and processed by Promosfera for the management of contractual and commercial relationships.

2. TYPES OF DATA PROCESSED

Promosfera processes only ordinary personal data, such as:

- name, surname, corporate role or function;
- contact details (telephone number, corporate email address, certified email, if any);
- any legal representation data (name, surname, tax code, identity document);
- data necessary for administrative and accounting management (e.g. billing details).

3. PURPOSES AND LEGAL BASIS OF THE PROCESSING

The data are processed for the following purposes:

- performance and management of contractual and pre-contractual relationships with the company for which the data subject works (Art. 6(1)(b) GDPR);
- compliance with legal, accounting and tax obligations (Art. 6(1)(c) GDPR);
- protection and defence of the Data Controller’s rights in judicial or extrajudicial proceedings (Art. 6(1)(f) GDPR – legitimate interest).

4. PROCESSING METHODS

Processing is carried out using electronic and paper tools, in compliance with the principles of lawfulness, fairness, transparency, minimisation and security laid down by the GDPR.

Access to the data is granted only to authorised personnel belonging to the Administration, Management and IT areas, as well as to external entities designated as Data Processors pursuant to Art. 28 GDPR.

5. DATA DISCLOSURE

The data may be disclosed, strictly within the limits necessary, to:

- tax and legal consultants, accountants and labour consultants;
- IT service providers and cloud providers (Microsoft, Foreach S.r.l., Keliweb, etc.);
- banking institutions and public authorities for legal compliance;
- judicial or administrative authorities, where required.

The updated list of external Data Processors is available upon request at the above address.

6. TRANSFERS OF DATA TO THIRD COUNTRIES

Some service providers (e.g., Google and Microsoft) may transfer personal data to third countries.

Such transfers are carried out in accordance with Articles 44 et seq. GDPR, on the basis of the European Commission's Adequacy Decision of 10 July 2023 (Data Privacy Framework) or, where not applicable, through Standard Contractual Clauses (SCCs).

7. MANDATORY NATURE OF DATA PROVISION

Providing the personal data indicated above is mandatory for the establishment, continuation and management of the contractual relationship between the parties, as well as for compliance with binding legal obligations.

Therefore, failure to provide the data required for the processing activities that may be necessary from time to time makes it impossible to perform any stage of the contractual relationship.

8. DATA RETENTION

Personal data are retained:

- for the entire duration of the contractual relationship;
- for an additional 10 years after its termination, for tax, civil and evidentiary purposes.

- At the end of the retention periods, the data are deleted through a simple deletion procedure from IT systems and paper archives.

9. RIGHTS OF THE DATA SUBJECT

In relation to the processing of the above-mentioned data, the Client, pursuant to Articles 15–22 of the GDPR, has the right to obtain from the Data Controller:

1. By exercising the right of access, confirmation as to whether or not personal data concerning them exist, the communication of such data in an intelligible form, and knowledge of their origin, as well as of the logic on which the processing is based (Art. 15).
2. The updating of the data, their rectification or their integration (Art. 16).
3. The erasure, within a reasonable period, of their data, their transformation into anonymous form, or the blocking of data processed in breach of the law, or the restriction of processing (Arts. 17–18).
4. Certification that the operations referred to in points 2) and 3) have been communicated to those to whom the data have been disclosed, unless this proves impossible or involves a disproportionate effort (Art. 19).
5. The data subject has the right to withdraw consent given for optional processing activities that are not connected with the performance of the contract entered into with the Data Controller.
6. The data subject also has the right to request data portability (Art. 20), the right to object, on legitimate grounds, to the processing of personal data concerning them (Art. 21), the right not to be subject to automated decision-making, including profiling (Art. 22), as well as the right to lodge a complaint with the competent Supervisory Authority for any violation they believe they have suffered or, alternatively, to bring proceedings before the ordinary judicial authority.

In Italy, the Supervisory Authority is the Garante per la protezione dei dati personali, Piazza Venezia 11, 00186 Rome, tel. 06.696771, email: garante@gpdp.it.

To exercise their rights, the data subject may send an email to info@promosfera.com.

10. AUTOMATED DECISION-MAKING

The Data Controller does not make use of automated decision-making processes, including profiling, as defined by Regulation (EU) 2016/679 as any form of automated processing of personal data intended to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning professional performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Where such activities are carried out, they are always performed through human, non-automated decision-making processes.

11. AMENDMENTS TO THIS PRIVACY NOTICE AND PRESUMPTION OF AWARENESS

As data protection regulations are constantly evolving, this privacy notice may be subject to amendments that will be communicated by notice and must be read, with the latest version being presumed known by the Client.

The latest revision is dated **October 2025**.

Promosfera S.r.l.