

PERSONAL DATA PROCESSING POLICY

1. Data Controller

ALEF Consulting S.r.l, having its registered office in via Antonio Grossich 34, 20131 Milan, Italy – Tel. +39 0284968001 (hereinafter referred to as “ALEF”).

2. Type of personal data subject to processing

In compliance with art. 13 of the Italian Legislative Decree 196/2003 (hereinafter referred to as “Personal Data Protection Code”) and art. 13 of GDPR, the Data Controller, owner of website alefconsulting.com, informs users that they shall each time be asked for their specific content to the processing of the personal data they may provide and that their personal data shall be used for the purposes that users shall each time be informed of.

Processed personal data consist of the data users enter in the form, i.e. their name, surname, town/city, e-mail address, telephone no. and message. Further data may be only collected with the explicit consent of users.

3. Processing methods

The Data Controller shall process users’ personal data under both a paper and a digital version.

ALEF shall act as Data Controller for the data entered in the form and mentioned at point 2. To subscribe to any event/service, the Website shall ask users for their common data (name, surname, e-mail address). Users’ data shall be collected, processed and stored in full compliance with any rule on personal data protection as well as with any measure pursuant to the new EU Regulation 2016/679. In addition, users’ data shall be processed in full compliance with the self-regulatory directions of the existing relevant Codes of Ethics.

ALEF shall process personal data:

- a) strictly complying with the general principles stated by art. 11 of the Personal Data Protection Code and with art. 5 and 6 of GDPR and thus applying all principles of fairness, lawfulness, integrity and compliance with the above-mentioned purposes;
- b) using manual, digital and telematic tools and according to processing principles strictly relating to the above-mentioned purposes with the aim of granting data protection and safety;
- c) acting as Data Controller and shall appoint third parties as “data collectors” according to art. 30 of the Personal Data Protection Code or as authorised persons according to GDPR;

It should be noted that:

The Data Controller may transfer users’ personal data within their respective and specific remit:

- a) to any public or private third party who ALEF shall be obliged or bound to transfer users’ data to;
- b) to any external (public and private) third party for the same purposes and principles of proper and fruitful relation management.

Last but not least, it should be noted that according to art. 15 of GDPR data subjects shall have the right to be informed on the origin of data, on processing purposes and methods and to update, rectify, integrate, erase and anonymise their personal data without prejudice to their right to object to data processing at any time on legitimate grounds.

4. Personal data processing purposes

Personal data shall be processed prior users’ consent for the purposes which users shall each time be notified. The Data Controller shall process users’ personal data:

A) Without users’ explicit consent (art. 24 a), b) c) of the Personal Data Protection Code and art. 6 b), e) of GDPR) for the following Service Purposes:

- to finalize any contract for the services rendered by the Data Controller;
- to meet any existing pre-contract, contract and tax obligation due to relations with users;
- to meet any obligation due to existing laws, regulations, European legislation or orders from authorities (e.g. on money laundering);
- to exercise its rights as Data Controller, e.g. its right to appear before a Court;

B) Prior users’ specific and distinct consent (art. 23 and 130 of the Personal Data Protection Code and art. 7 of GDPR) for the following marketing purposes:

- to send newsletters, marketing and/or promotional messages on the products and services offered by the Data Controller and surveys about the quality of the services rendered by the Data Controller by e-mail, mail and/or sms messages and/or telephone calls;
- to send marketing and/or promotional messages of third parties (e.g. partners, other companies of the Group) by e-mail, mail and/or sms messages and/or telephone calls.

5. Place of personal data processing

The servers of company ALEF are located at the registered office of the Data Controller mentioned at para. 1.

6. Transfer and disclosure of personal data

Collected personal data shall be transferred to, sold to or exchanged with any third party only prior data subjects' explicit consent, except for personal data necessary to render newsletter services.

7. Consequences of not providing personal data

Users shall provide their personal data prior their specific consent for the purposes they shall each time be notified.

8. Rights of data subjects

Any data subject shall exercise the rights under art. 7 of the Personal Data Protection Code and art. 15 of GDPR and namely: i. data subjects shall have the right to obtain confirmation as to whether or not personal data concerning them are being processed, even though they have not been registered yet, and access them under a commonly used version; ii. data subjects shall have the right to obtain information about: a) any origin of personal data; b) any processing purpose and method; c) any logic underlying electronic processing; d) the identity and the contact details of the Data Controller, data processors and any appointed representative according to art. 5, para. 2 of the Personal Data Protection Code and art. 3, para. 1 of GDPR; e) any third party or any category of third parties who users' personal data may be transferred to or disclosed to as appointed representatives within a country or as processors or persons in charge of personal data processing; iii. data subjects shall have the right to obtain: a) the update, the rectification or, as long as they have an interest therein, the integration of their personal data; b) the erasure or the anonymisation of their personal data or the restriction of personal data processing in the event of any infringement of the law, including personal data which shall not be stored for the purposes they were collected for or processed for; c) the confirmation whether or not those persons whom personal data have been transferred or disclosed to have been informed of all operations mentioned by points a) and b), including their content, unless this obligation proves to be impossible or clearly requires excessive activities compared with the right to be protected; iv. data subjects shall have the right to object as a whole or in part: a) to personal data processing on legitimate grounds, even though personal data are relevant to the purposes which they have been collected for; b) to personal data processing for the delivery of advertising or direct sales messages, market researches or marketing messages by automated calling systems without operators, by e-mail messages and/or traditional telephone and/or mail marketing systems. It should be noted that pursuant to the above-mentioned point b) data subjects shall have the right to object to direct marketing purposes both by automated and traditional methods without prejudice to their right to partial objection. Therefore, data subjects may decide to receive messages by traditional methods only or automated messages only or none of these two types of messages. Where applicable, data subjects shall have the rights mentioned by art. 16-21 of GDPR (right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to objection) as well as the right to lodge claims to the Italian Data Protection Authority.

In particular, users shall have the right to receive from the Data Collector a copy of the personal data regarding them. Users may exercise any of these rights by writing an e-mail to: ml@aleflab.com

For the purposes mentioned by art. 6 users' personal data may disclosed to:

- the employees or collaborators of the Data Controller or of the companies of the Group in Italy and abroad who have been appointed as internal processors and/or system administrators and/or authorised persons;
- third party companies or other third parties (including but not limited to suppliers or service companies, etc.) who are in charge of activities on behalf of the Data Controller and who have been appointed as external data processors or authorised third parties.

9. Duration of personal data processing

Personal data shall be processed for the time necessary to achieve the purposes which they have been collected for.

In addition, personal data shall be available to the Data Controller, the Processor and the persons in charge of processing them for the amount of time fixed by the law (art. 22, para. 5 of the Personal Data Protection Code) or until data subjects ask for their erasure.

10. Contact details

ALEF, having its registered office in Milan, Italy, Via Antonio Grossich 34, postal code 20131, is the Data Controller and users may contact the Data Controller by e-mail: ml@aleflab.com

Should users need to get in touch with ALEF or receive further information on personal data processing, including the updated list of the third parties who their personal data may be transferred to or disclosed to and who are in charge of processing personal data, they can send an e-mail to: ml@aleflab.com

11. Link

This Policy refers to and applies to the data collected through the Website. ALEF shall not be liable for data processed by websites which users may navigate to through links in the Website.

12. Web browsing data

During normal operations computer systems and software procedures used to run the Website acquire certain personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected with the aim of associating them with identified data subjects. However, due to its inherent nature, this information may identify users if elaborated and associated with data owned by third parties.

This category of data comprises IP addresses or domain names of the computers connecting to the Website, the URI (Uniform Resource Identifier) notation addresses of the resources required, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numeric code showing the status of the response from the server (successful, error, etc.) and other parameters relating to users' operating system or IT environment.

The above-mentioned data could be used to ascertain responsibility in case of computer crime which may harm the Website.

With reference to IP addresses, the Data Controller makes use of third parties' analysis services (Google Analytics, AddThis and Disqus) which use IP addresses of the Website's users to provide data in their reports and install even profiling cookies through the Website (please refer to the specific Cookie Policy herein).

13. Cookies

ALEF and reliable third parties provide a series of services through cookies on our websites and on mobile applications. ALEF uses cookies to make the use of its Website easier so that it fits users' interests and requirements. Cookies may also be used to speed up users' future experiences and activities on our Websites with the aim of providing users with a rich and customised access to essential services and to other services which in our opinion may improve users' visit. In addition, ALEF uses cookies to obtain anonymous aggregate statistical information which shows how users use our Websites and to improve the structures and the contents of the Websites. ALEF believes that this is how consumers can fully trust our services.

What are cookies?

Cookies are small files which websites or mobile applications send to users' computers, tablets or mobile devices. Normally cookies contain the name of the website where they come from, their lifetime (i.e. how long they remain in users' devices) and a value which is usually a random unique number but does not contain personal information such as names or e-mail addresses. Cookies make it easier for users to navigate from one page to another, they store preferences users have shown during their navigation on the web. ALEF uses this information to improve its websites.

Which types of cookies does ALEF use?

The Website uses technical cookies. Thanks to cookies the Website remembers users' actions and preferences (such as login data, selected languages, font size, display settings, etc.) so that they will be available on users' subsequent visits or when users navigate from one page to another. Therefore, cookies are used to perform IT authentications and session monitoring activities and to store information about the activities of the users who connect to a website and they may also contain a unique identifying number tracing users' navigation through a web site for statistical or advertising purposes. When they navigate a website, users may receive cookies from other websites or web servers (the so-called "third-party cookies"). Some operations would be impossible without cookies and under certain conditions cookies are necessary for websites to operate from a technical point of view.

Among such technical cookies which do not require users to provide their explicit consent, the Italian Data Protection Authority also includes:

- "cookie analytics" whenever they are directly used by website administrators to collect information in an aggregate way on the number of users and on how they visit a website;
- "web browsing cookies" or "session cookies" (to log in or to purchase products or services, etc.);

- “functional cookies” which allow users to navigate according to a series of selected criteria (e.g. languages, viewed products or products selected for their purchases) with the aim of improving all services rendered to users.

Which first-party cookies does this Website use?

| Cookie | Name | Purpose | Lifetime |
|----------------------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| Persistent Cookie Consent pop up | cookies_msg | Enablement cookies. They are downloaded when users click “Accept cookie” button of the floating footer. For further information, please refer to the website http://silktide.com/cookieconsent | One year from when they are created |

| Cookie | Name | Purpose | Lifetime |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| These cookies collect information about how users use the Website. ALEF uses this information to improve the Website and to draw reports. These cookies collect information – e.g. the number of users, how they have reached the Website and which pages they have visited – in an anonymous way. | | | |
| GoogleAnalytics | _utma | Google stores the information collected by cookies on servers located in the USA. Google may transfer this information to third parties should the law requires this or should these third parties process this information on behalf of Google. Google shall not associate users’ IP address with any other address. Unless Google Cookie have been disabled, using this Website means that users accept the use of Google Cookies and of the information created by Google Analytics. | 2 years |
| | _utmb | | 30 minutes |
| | _utmc | | Session |
| | _utmz | | 6 months |
| Here is an overview on Google privacy policy. For further information on how users may disable GoogleAnalytics cookies, please visit Google website. | | | |

This Website does not use third-party cookies.

How can users control or delete cookies?

CookieBot allows users to deny their consent to the processing of profiling cookies as a whole or in part. Users can click on “Withdraw Cookie consent” in this page to withdraw their consent. In addition, users can block cookies directly through the relevant setting in their browsers: navigation shall be available for all the shown functionalities. Moreover, users may reject any kind of cookies and navigate through our Website. Users shall be aware that navigating to another area of the Website or selecting an element of the Website (e.g. an image or a link) means users provide their consent to cookies. Disabling cookies ALEF make use of may affect users’ navigation experience, for example users may not have the chance to visit some sections or they may not receive customised information when they visit the Website.

14. Amendments

ALEF reserves the right to amend personal data processing criteria and procedures at any time and to change and modify the access to this Website or its content. In this event, ALEF shall promptly update its Privacy Policy that users shall be considered aware of as soon as it is published on the Website.

The latest amendment to this Privacy Policy dates to 2nd May 2018.