



## PRIVACY POLICY INFORMATION

This is to provide you with the essential information in accordance with Article 13 of EU Regulation No. 2016/679 (hereinafter referred to as the "GDPR") regarding the processing of your personal data by Kos Care s.r.l. in relation to your registration for training events and the use of the services offered.

### DATA PROCESSING

1. Subject of processing The Data Controller processes personal data, both identifying and non-sensitive (such as, but not limited to, name, surname, company name, region of residence, address, phone number, email - hereinafter referred to as "personal data" or simply "data") provided by you when filling out registration forms for events through the Data Controller's websites (<https://sstefano.it>, <https://neomesia.com>, <https://anniazzurri.it>) or by sending such forms via email or fax, requesting clarification or support.

2. Purposes of processing Your personal data is processed:

A. without your express consent (art. 6 letters b), e) of the GDPR) for the following Service Purposes:

B. to allow you to benefit from the requested services;

C. to participate in initiatives organized by the Data Controller (e.g., events);

D. to process a contact request;

E. to fulfil obligations provided by law, regulations, EU legislation, or an order of the Authority;

F. to prevent or uncover fraudulent activities or harmful abuses to the Data Controller's websites;

G. to exercise the rights of the Data Controller, such as the right to exercise a right in court.

In the cases indicated above, the legal basis for the processing of your personal data consists of performing a contract with you or providing the service you specifically requested, complying with a legal obligation, or protecting our legitimate interests.

Only with your specific and separate consent (art. 7 GDPR) for the following Additional Purposes:

- sending opinion and satisfaction surveys, newsletters, and/or invitations to events by email or registering you for training events organized or participated in by the Data Controller.

3. Processing methods the processing of your personal data is carried out using the operations listed in art. 4, no. 2 of the GDPR, namely: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure, and destruction of data. Your personal data is processed both in paper form and electronically and/or automatically.
4. Retention period of processed data The Data Controller will process personal data for the time necessary to fulfill the aforementioned purposes and, in any case, for no more than 10 years after the termination of the relationship for Service Purposes.
5. Security measures The Data Controller has adopted a wide variety of security measures to protect your data against the risk of loss, misuse, or alteration. In particular, the Data





Controller has implemented the measures referred to in Articles 24, 25, and 32 of the GDPR and secure data transmission protocols.

6. Data access Your data may be made accessible for the purposes listed in points 2.A) and 2.B) to:
  - employees and collaborators of the Data Controller, acting as authorized internal processors and/or data processors;
  - third-party companies or other entities that carry out outsourcing activities on behalf of the Data Controller, acting as Data Processors pursuant to Article 28 of the GDPR 679/2016, whose updated list can be obtained by writing to the Data Controller.
7. Data disclosure Without your express consent pursuant to art. 24 letters A), B), and D) of the Privacy Code and art. 6 letters b) and c) of the GDPR, the Data Controller may disclose your data for the purposes listed in point 2.A) to supervisory bodies, judicial authorities, and all other subjects to whom communication is mandatory by law for the fulfilment of said purposes. Your data will not be disseminated or subject to profiling.
8. Nature of data provision and consequences of refusal to respond the provision of data for the purposes mentioned in point 2.A) is mandatory. In their absence, we will not be able to guarantee your registration for training events or the services listed in point 2.A).

The provision of data for the purposes mentioned in point 2.B) is optional. You can therefore choose not to provide any data or subsequently deny the processing of data already provided. In this case, you will not receive invitations to events, newsletters, or opinion and satisfaction surveys via email. However, you will still have the right to the services listed in point 2.A).

## **RIGHTS OF THE DATA SUBJECT**

As data subjects, you have the general rights listed in Articles 15-23 of the GDPR 679/2016, specifically the right to:

- obtain confirmation of the existence or non-existence of personal data concerning you, even if not yet recorded, and their communication in an intelligible form;
- obtain information about: a) the origin of personal data; b) the purposes and methods of processing; c) the logic applied in case of processing carried out with the help of electronic tools; d) the identification details of the data controller, data processors, and the designated representative pursuant to Article 3, paragraph 1 of the GDPR; e) the subjects or categories of subjects to whom personal data may be communicated or who may become aware of it as designated representatives in the territory of the State, data processors, or authorized persons;
- obtain: a) the updating, rectification, or, when interested, integration of data; b) the erasure, anonymization, or blocking of data processed unlawfully, including data that does not need to be retained for the purposes for which it was collected or subsequently processed; c) certification that the operations mentioned in letters a) and b) have been notified, also with regard to their content, to those to whom the data has been communicated or disseminated, unless this requirement proves impossible or involves a disproportionate effort compared to the right being protected;



- object, in whole or in part: a) on legitimate grounds, to the processing of personal data concerning you, even if relevant to the purpose of collection; b) to the processing of personal data concerning you for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication, using automated calling systems without the intervention of an operator, via email and/or through traditional marketing methods by phone and/or postal mail. Please note that the right to object of the data subject, as mentioned in the previous point b), regarding direct marketing purposes extends to both traditional and automated methods, and the data subject may decide to receive only communications through traditional methods, only automated communications, or none of the two communication types.

If applicable, you also have the rights listed in Articles 16-21 of the GDPR (right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object), as well as the right to lodge a complaint with the Supervisory Authority.

#### **EXERCISING YOUR RIGHTS**

You can exercise the rights mentioned in point 10) at any time by contacting any Koscare s.r.l. facility or, for a more prompt and effective management by the Data Controller, using the following contact details:

- Via email: [dpo@kosgroup.com](mailto:dpo@kosgroup.com)
- Via mail: Kos Care s.r.l., Via Durini, 9, Milan, Attention: Data Protection Officer.

#### **DATA CONTROLLER**

Kos Care s.r.l., Via Durini, 9 - 20122 Milan Registration number, Tax code, VAT number: 01148190547 Milan Companies Register No. 2124636 Management and Coordination pursuant to Article 2497 of the Italian Civil Code: KOS S.p.A.

#### **DATA PROTECTION OFFICER AND DATA PROCESSORS**

The Data Protection Officer can be directly contacted via the email address: [dpo@kosgroup.com](mailto:dpo@kosgroup.com). Alternatively, you can indirectly contact the Data Protection Officer by contacting any Kos Care facility. The updated list of Data Processors and authorized personnel processing personal data is kept at the Data Controller's headquarters.

*Last update on April 6, 2022*