

Privacy Policy

In conformity with art. 13 D.Lgs 196/03 concerning protection and management of personal data we inform that S.B.S. Consulting di Silvia E.A Siminelli (hereinafter also S.B.S. Consulting), in quality of Proprietor of the website and of the data management grants that probable personal data sent upon the User's own free will in e-mail forms in our website (i.e. name, surname, personal or company's phone number, probable personal or company's address, probable Fiscal Code or VAT number, e-mail) will be managed only for the following purposes:

- . to process offers, orders, orders' confirmation, contracts, invoices
- . to reply and give information to the User of the website concerning the services offered by S.B.S. Consulting
- . to run the own activities of services required by the Customer himself concerning Diagnosis, Analysis, Management Consulting, Strategic Corporate/Competitive Marketing, traditional and/or digital Marketing, Business Consulting, Consulting about digitalization, GDPR, traditional and/or digital Internationalization, and Project Management, Implementation of Projects designed by S.B.S. Consulting for the Customer himself
- . to reply concerning linguistic test evaluating the personal knowledge of the English language; to give answer and information concerning the linguistic services offered by S.B.S. Consulting

Replies will be sent by e-mail or by phone in case in depth information are needed.

. payments through wire are directly managed by the bank and S.B.S. Consulting is not responsible about the management of data of third parties. Please, read the privacy policy of the bank.

. one particular remark about business information (related only to Companies and not to Private Person and/or Professionals) requirement coming from users of the website either they are Customers and prospects. Service intended especially linked to integrated projects of services within wide evaluations to support the choices of S.B.S. Consulting Customer, in consideration of the S.B.S. Consulting Studio features. These requirements are processed according to the Ethics Code set up by A.N.C.I.C. (Associazione Nazionale tra le imprese di Informazioni Commerciali) concerning the Informative about the management of personal and business data for business information purposes G.U. n 238 dated 13.10.2015 approved by the "Garante" (guarantor). This even though S.B.S. Consulting is not subscriber of the A.N.C.I.C. web portal. The exchange of information is only and strictly confidential between S.B.S. Consulting and the Customer. S.B.S. Consulting is not responsible of any inappropriate usage of information and about the data resulting from public official resources which allow to draw up a business report about companies. S.B.S. Consulting moreover does not offer any kind of investigation at commercial purpose upon private people and upon Professionals, observing the present norms related to privacy. The public and official sources used are Chambers of Commerce, public directories, registries and public archives or included in acts or public documents which are generally accessible among these also newspapers on paper or on the web which are available to anybody. Information can be required also as list forms for sectors or categories for markets analysis, marketing and commercial purposes on behalf of the Customer related to the services offered by S.B.S. Consulting and with the purpose of markets and competitors analysis, business partnership opportunity. S.B.S. Consulting is not responsible of the data usage of the Customer. Collected information are processed only by the Proprietor in the Studio by means of informatic and paper supports and come from public and official sources only; afterwards they are filed up and stored adopting criteria which grant security and confidentiality. Data are kept for one year. The acquisition of sensitive data and top secret business or industrial information are excluded. Further information about privacy matter related to

Business Information are available on the portal: www.informativaprivacyancic.org. About Ethics Code it is possible to refer to www.garanteprivacy.it.

Data that might be required and processed can be the following:

name, surname, phone numbers of the company and/or related to a person, eventually personal or company's address, eventually Fiscal Code or VAT code, e-mail. They refer only to Companies or to Professionals.

As regards the activities of Diagnosis, Analysis, Consulting, Projecting on the basis of agreement and consent other data, details, information are required in order to allow S.B.S. Consulting running the activities.

How S.B.S. Consulting manages the personal data:

. collecting, recording, processing, organizing, filing, storing, changes, selection, comparison, usage, cancellation of data. Data are filed up and stored by means of informatic supports, in data-bases and on paper supports inside the studio processed by the Proprietor only. Thus, suitable criteria are adopted to grant security and confidentiality. No data being sent or processed by third party in the Studio or outside the Studio. Data can be managed only and exclusively inside the studio for analysis and statistics in aggregated way related to the business.

. All data can be managed only for accomplishments related to our business in order to give information about the services offered by S.B.S. Consulting, for keeping prospect contacts by means of phone, e-mail, fax and for sending probable communication, newsletters, advertising about the services offered to Customers or prospects. Data are processed for the administrative and commercial fulfillments such as invoices, offers to active Customers and prospects.

PERSONAL DATA PROTECTION:

S.B.S. Consulting has implemented reasonable technical and organizational measures designed to secure personal data and information against loss, from unauthorized access, use, abuse, disclosure, alteration and destruction of personal data by not authorized external parties. However, the Internet is an open system and cannot be granted that unauthorized third parties will never be able to defeat those measures or use personal information for improper purposes. S.B.S. Consulting however has adopted tools able to limit possible breach and damages.

RIGHT OF ACCESS TO PERSONAL DATA:

The owner of the data has the right to obtain confirmation about the storing of his/her personal data even though they are not recorded yet, and to obtain the indication of the personal data origin, the purposes and ways the data will be processed, about the logic applied in case of the process implemented by means of electronic tools; a) the identification data of the owner, possible officers and representative according to the art. 5, comma 2; b) of the subjects or the categories of subjects to whom the personal data can be communicated or can acknowledge as representatives in charge in the territory of the State, or in charge as managers or representatives by the side of the requiring Company. 1. The owner of the data has the right to withdraw the Consent, to obtain: a) access, updating, changes also in case he/she shows the interest in it, the data integration; b) cancellation, changes in anonymous way, or the data blocking processed eventually sent in violation of law; c) the confirmation that the steps explained in a) and b) have been communicated also related to their content, about those data communicated or divulged, unless the case

this accomplishment results impossible or needs a huge and disproportionate usage of means in respect to the right to be protected. 2. The owner of data has the right to object completely or in part: a) for legitimate reasons about the management of his/her personal data although pertinent about collecting purpose; b) the personal data processing with the purpose of service communication, promotions, information about topics treated by S.B.S. Consulting (i.e. newsletter), which therefore will be sent only upon the Consent of the Customer or of the services User.

Herewith it is informed that the Proprietor and the responsible of the management of data is S.B.S. Consulting di Silvia E.A. Siminelli, Via Palmanova, 213/A – Milan – I. Phone 0039 02 25 62 949 – info@sbsconsultingstudio.com