

PROF. FRANCO ANGELONI
DE BONO TRAINER ON SIX THINKING HATS

OBJECT: disclosure statement pursuant to Articles 13 and 14 of the Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (*“on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)”*).

Dear Sir/Madam,

This disclosure statement is provided pursuant to and in accordance with Articles 13 and 14 of Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (*“on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)”*). The data which you provide will be used expressly for purposes relevant to the professional service requested.

The data will be processed with complete respect for your fundamental rights, without harming your confidentiality or dignity, and the other unavailable legal situations protected by current legislation.

In particular your personal data will:

a) processed lawfully, fairly and in a transparent manner in relation to the data subject (*“lawfulness, fairness and transparency”*);

b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; it is however made except as provided for in the Articles 5 (1) (b) and 89 (1) of Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (*“on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)”*) (*“purpose limitation”*);

c) adequate, relevant and limited to what is necessary in relation to the

purposes for which they are processed (“data minimisation”);

d) accurate and, where necessary, kept up to date; every reasonable step will be taken on to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (“accuracy”);

e) retained the appropriate technical and organisational measures required by the Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (“*on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)*”) in order to safeguard the rights and freedoms of the data subject.

However, all the other data retention obligations prescribed are saved for the data controller by the current legislation (“storage limitation”);

f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (“integrity and confidentiality”).

Your data will be processed using both manual and electronic means, implementing all suitable security measures to guarantee the privacy and integrity of the data, which will be stored in our archives on analogue medium or on digital medium.

In addition to the personal data you have provided pursuant to the Article 13 of Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (“*on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)*”), Professor Franco Angeloni can acquire, also pursuant to the Article 14 of the aforementioned European Parliament and of the Council no. 679/2016 EU of 27th April 2016, data concerning to your person in public or private subjects or however at databases to which the data controller has access, for the purpose of indicating exactly your data in the invoices issued.

The registers and databases consulted may also be located abroad or in virtual locations, as in the case of databases managed with Cloud systems.

There are no data processors in our organization, as all personal data are exclusively collected and processed by Professor Franco Angeloni, who, by way of derogation from what is permitted by the Article 2232 of the Italian civil code, performs all of his professional services personally, without resorting to substitutes and/or auxiliaries.

The provision of data you provide is compulsory for you, as a creditor of the professional service to which Professor Franco Angeloni is obliged, in compliance as prescribed by the combined provisions of Articles 1175 and 1206 of the Italian civil code, which require the creditor to cooperate with the debtor for the exact fulfilment of his obligations.

The acquired data will be classified and, without the authorization granted by the owner, will not be disclosed to any subject, except in cases where, according to the current legislation, the public authorities have the power to impose on the professional owner of the exceptions to professional secrecy, adequately motivated.

Professor Franco Angeloni does not adopt any automated decision-making, including profiling, as referred to in the Article 22 of Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (*“on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)”*).

Professor Franco Angeloni, in his capacity as data controller, does not intend to transfer personal data to a third country or international organisation.

Below is a summary of the main rights that you attribute to the Articles 15 and sequent of Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (*“on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)”*).

You have the right:

- to obtain from the controller confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the information provided for in the Article 15 (1) of the aforesaid Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (Article 15 (1) of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016);

- to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you; taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement (Article 16 of the aforesaid Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016);

- to obtain from the controller the erasure of personal data concerning you without undue delay and the controller shall have the obligation to erase

personal data without undue delay for the reasons provided for by Article 17 (1) of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (Article 17 of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016);

- to obtain from the controller the restriction of processing of any personal data concerning you in the circumstances provided for in the Article 18 (1) of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (Article 18 of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016);

- to obtain from the controller the reception of the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format and you have also the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, in the cases and under the conditions provided for in the Article 20 of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 (Article 20 of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016);

- to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you according to the Article 6 (1) (e, f) of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016, including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims (Article 21 (1) of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016).

Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing (Article 21 (2) of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016);

- the right to withdraw your consent at any time; the withdrawal of consent shall not affect the lawfulness of processing based on your consent be-

fore its withdrawal (Article 7 (3) of the Aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016);

- to lodge, without prejudice to any other administrative or judicial remedy, a complaint with a supervisory authority (Article 77 of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016);

- to have, without prejudice to any other administrative or non-judicial remedy, an effective judicial remedy against a legally binding decision of a supervisory authority concerning you (Articles 78 and sequent of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016).

In any case it remains unaffected as specified below in relation to the right to obtain the erasure of personal data concerning you.

The data subject can not exercise the right to obtain the erasure of personal data provided for by the Article 17 (1, 2) of the aforementioned Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016 in the cases contemplated by the Article 17 (3) of the same Regulation of the European Parliament and of the Council no. 679/2016 EU of 27th April 2016, which excludes the right to cancellation “to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the controller;
- c) for reasons of public interest in the area of public health in accordance with the Article 9 (2) (h, i) as well as with the Article 9 (3);
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the Article 89 (1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims”.

The data controller of the data is Professor Franco Angeloni, with office study in a Teramo, in Via Carducci n. 46, to which you can direct any request to the addresses indicated in this statement.

Professor Franco Angeloni reserves the right to accept a commission after having examined the documentation, which will be used exclusively for this reason.