

# Look Positioning srls

Corso San Gottardo, 2  
20136 Milano (MI)  
P.IVA 10028180965

**Claudia Barberis**  
PERSONAL BRANDING

## Privacy Policy concerning the processing of personal data pursuant to articles 13-14 of (EU) Regulation 2016/679

**Data subject: customers.**

Look Positioning srls in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

Purposes and legal basis of processing: specifically, your data will be processed for the following purposes, relating to the fulfilment of legal obligations:

- legal compliance with regard to taxation and accounting;
- Managing of controversy.

Your data will also be processed for the following purposes relative to the performance of measures connected to contractual or preliminary obligations:

- Activities schedule;
- After sales support;
- Clients management;
- Detection of the degree of customer satisfaction;
- Historical filing system of customer invoices;
- Quality Management.

Your data will also be processed for the following purposes necessary to pursue data controller's legitimate interest:

- Service and commercial communications relating to the type of service provided.

For the purposes of the aforesaid processing, the Data Controller may obtain knowledge of special categories of data, as follows: health conditions. Personal data in these special categories are processed in compliance with art. 9 of the GDPR.

Further to your consent, your personal data may be used for the following purposes:

- Marketing and advertising purposes (commercial communications via email, newsletter, whatsapp, sms, telephone calls and similar relating to the services offered to our customers).

Your contribution of data is optional with regard to the abovementioned purpose, and any refusal of consent will not affect the continuation of the relationship or the congruency of the processing.

Processing procedures. Your personal data may be processed by the following ways:

- Creation of profiles concerning clients, suppliers and consumers;
- Manual personal data processing with paper filing system;
- contract data processing by third parties;
- computer processing.

All data are processed in compliance with the procedures specified in articles 6 and 32 of the GDPR and with the adoption of the appropriate security measures required.

Your data will only be processed by staff specifically authorised by the Data Controller, and specifically by the following categories of staff:

- Collaborators or assistants of the owner.

Disclosure. Your data may be disclosed to external entities for the correct management of the relationship and specifically for the following categories of Recipients, including all the duly designated Data Processors:

- Suppliers and subcontractors necessary for the provision of the service;
- banks and lenders;
- Suppliers who manage Cloud platforms for the management of marketing activities such as newsletters, CRM, text messages, etc. (Active Campaign);
- consultant and freelance professionals, also working as firms;
- Public/private subjects whose data transmission is mandatory or necessary in compliance with regulations or functional to the relationship management;
- Professionals or companies in charge of video / photographic shooting (if required by the service provided).

Distribution: Your personal data will not be distributed in any way.

Your personal data may also be transferred, only for the aforesaid purposes, to the following countries:

- Transfer of data to the United States in compliance with the provisions in chapter V of the GDPR in art. 45 par. 1, 46 par. 2 lett. c), art. 49 par. 1 left. b) on protected cloud archives (Apple iCloud);
- EU countries;
- Transfer of data to the United States in compliance with the provisions in chapter V of the GDPR in art. 45 par. 1, 46 par. 2 lett. c), art. 49 par. 1 left. b) on a platform with a cloud database if the interested party has given his consent for marketing activities (e.g. receiving newsletters, commercial proposals).

Data Storage Period. In accordance with the principles of lawfulness, limitation of purpose and minimisation of data, pursuant to art. 5 of the GDPR, the data storage period for your personal data is:

- For contractual and legitimate interest purposes: the data are kept for the time necessary for the performance of the services provided and within the time required by law;
- For marketing purposes: for a period of 24 months from the date of the last contact with the data subject, where the last contact means, among others, the termination of the contractual relationship, participation in an event, the use of a service provided by our company or the opening of a newsletter and / or until the withdrawal of consent or the exercise of the right of opposition by the interested party as required by the provision of the Privacy Guarantor n. 181 of 15/10/2020 and by EU Reg. GDPR 2016/679.

Data Controller: the Data Controller, as defined by the Law, is Look Positioning srls (Corso San Gottardo, 2, 20136 Milano (MI); VAT number: 10028180965; contactable at the following addresses: E-mail: [info@claudiabarberis.com](mailto:info@claudiabarberis.com)) in the person of Claudia Barberis.

You are entitled, by application to the Data Controller, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

You may also examine whenever you like the updated version of the present report by connecting to the following web site <https://www.privacylab.it/informativa.php?18409409778&lang=en>.

## Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.

2. The data subject has the right to be informed of:

- a. the source of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied if the data are processed by electronic devices;
- d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;
- e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

- a. the updating, rectification or, where interested therein, integration of the data;
- b. the erasure, anonymisation or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
- c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
- d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

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## Data subject consent form

Data : ..... Place : .....

Name, Surname: .....

I, the undersigned data subject, having received the information supplied by the Data Controller under article 7 of (EU) Reg. 2016/679 (privacy policy statement no. 18409.51.409778.1947482):

Do you consent to the processing of your personal data for the optional purposes set out below?

YES  NO Marketing and advertising purposes (commercial communications via email, newsletter, whatsapp, sms, telephone calls and similar relating to the services offered to our customers)

Data subject:

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