

# Awair srl

Via Guido Cavalcanti, 5  
20127 Milano (MI)  
P.IVA 07830500968  
PEC: awairsrl@pec.it



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

**Data subject: consultants and professionals, even if associated.**

Awair srl 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:

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

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

- After sales support;
- Commission management;
- Clients management;
- Management of company equipment;
- Activities schedule.

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

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

- 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:

- Administration office;
- Awair's Partners.

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:

- banks and lenders;
- consultant and freelance professionals, also working as firms;
- customers and users.

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:

- EU countries: in accordance with the Microsoft Volume Licensing Services Agreement, Awair S.r.l. will use Microsoft's online services to store data (OneDrive for Business, SharePoint, Office 365, ...), in this situation Microsoft will store the following Company Data at rest only within the European Geographic Area: (1) the contents of the Exchange Online mailbox (body of the e-mail message, calendar entries and content of e-mail attachments), (2) the contents of the SharePoint Online site and the files stored on that site, (3) the uploaded files on OneDrive for Business and (4) the content of projects uploaded to Project Online. Microsoft's GDPR policy is available at <http://www.microsoftvolumelicensing.com/Downloader.aspx?documenttype=OST&lang=Italian>.

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:

- 5 - 10 years pursuant to art. 2948 of the Italian Civil Code which provides for a five-year prescription for periodic payments; art. 2220 of the Italian Civil Code which provides for the retention of accounting records for 10 years; art. 22 of the D.P.R. 600 of 29 September 1973.

Data Controller: the Data Controller, as defined by the Law, is Awair srl (Via Guido Cavalcanti, 5 , 20127 Milano (MI); VAT no.: 07830500968; contactable as follows: E-mail: [info@awair.eu](mailto:info@awair.eu)) in the person of Gianfranco Gennaro.

The Data Protection Officer (DPO) designated by the Data Controller pursuant to art. 37 of the GDPR is:

- Jaera S.r.l. nella persona del Dott. Gianrico Gambino (Piazza della Repubblica, 32 , 20124 Milano (MI); VAT no.: 10557200960; contactable as follows: E-mail: [dpo@awair.eu](mailto:dpo@awair.eu)).

You are entitled, by application to the Data Processor, 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?19083420590&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.