INFORMATION ON THE PROCESSING OF PERSONAL DATA

DATA CONTROLLER AND CONTACT DETAILS	**CON.SE. S.r.l.** privacy@conse.it Via Molino Rosso 9/C - 40026 Imola (BO) Italia	
DATA PROTECTION OFFICER AND CONTACT DETAILS	**SGS Italia S.p.A.** ssc@sgsitalia.postecert.it Via Caldera 21 - 20153 Milano (MI) Italia	
CATEGORIES AND TYPES OF DATA COLLECTED AND TREATIES	For most of our services:	• contact information (name, personal and/or business address, telephone, e-mail addresses); and • financial information (tax code and information relating to transactions on current accounts).
	For some of our services:	• identifying information (e.g. date of birth, nationality, photographs, IP addresses and passwords); • professional and work information (training and work experience); and • additional Data necessary to manage our business relationship in accordance with the provisions of the specific applicable contractual terms or the General Terms and Conditions of Contract.
LEGAL BASES OF PROCESSING **PURPOSE OF THE PROCESSING** **NATURE OF DATA PROVISION**	**FOR THE FULFILMENT OF CONTRACTUAL OBLIGATIONS** (Art. 6.1.B del GDPR)	The Company processes Personal Data relating to its Customers to provide them with services aimed at the performance of pre-contractual obligations as part of an offer, to enter into a contract, or, in the context of the performance of contracts with Customers, to manage business relations with them and ensure the appropriate performance of services, for example to respond to requests related to customer service activities, issue invoices. The purposes of the Data processing are first and foremost in accordance with the specific service. You can find further details about the purposes of Data processing in the relevant documents, conditions and contractual terms.
	IN THE CONTEXT OF LEGITIMATE INTERESTS (Art. 6.1.F del GDPR)	Without unduly conditioning the interests of confidentiality or the fundamental rights and freedoms of the data subjects, the Company processes the Data, beyond the concrete fulfilment of the contract, to satisfy its legitimate interests, pursued directly by the Company or by third parties. Such legitimate interests may include: • verification activities regarding the quality of the services provided; • direct marketing purposes relating to services that the Company believes may be of interest to Customers, including those offered by affiliates of the Group to which the Company belongs; • activities aimed at learning more about the needs of its customers, conducting opinion research on products and services that may be of interest; • evaluations of possible actions in legal disputes; • actions aimed at ensuring the security of the Company's environment and IT infrastructure; and

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Società a socio unico soggetta alla direzione e al coordinamento di SMEUP S.p.A.
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C.F./ Reg.Imp e P. IVA IT02944241203 - REA: BO-479311 - Capitale Sociale € 500.000,00 i.v.
+39 0542 066200 gpa-group.it info@gpa-group.it

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<tr><td rowspan="3"></td><td></td><td>• risk management and compliance activities.</td></tr>
<tr><td>AS A RESULT OF ANY CONSENT GIVEN
(Art. 6.1.A del GDPR)
✓</td><td>In the event that a data subject has given the Company consent to process the Data for certain purposes (e.g. for marketing purposes), such processing is lawful based on the consent given.
Consent is always optional and can be revoked at any time.
For the avoidance of doubt, the withdrawal of consent does not affect the lawfulness of the processing of Data prior to the withdrawal itself.</td></tr>
<tr><td>BASED ON LEGAL OBLIGATIONS
(Art. 6.1.C del GDPR)</td><td>Finally, the Company is subject to various legal obligations, i.e. regulatory and legal requirements. The purposes of the processing include the fulfilment of monitoring and disclosure obligations under applicable laws.</td></tr>
<tr><td rowspan="4">WHO HAS ACCESS TO THE DATA AND WITH WHOM IT IS SHARED</td><td colspan="2">The other affiliates of the Group have access to the Data for service optimization. The Group's affiliates will act as appointed data processors pursuant to art. 28 GDPR or as independent data controllers, depending on the circumstances and purposes.</td></tr>
<tr><td colspan="2">The Data may be transmitted to third parties who need to perform specific activities in relation to the Data, in accordance with the purposes of the processing or to third parties providing services to the Company, such as IT and hosting service providers and subcontractors. When the Company carries out these activities, it takes steps to ensure that they comply with its data security standards, so that the Data remains secure.</td></tr>
<tr><td colspan="2">The Data may also be transmitted to Authorities, bodies and/or subjects to whom they must be communicated, pursuant to binding legal or contractual provisions. These authorities, bodies and/or individuals will act as independent data controllers.</td></tr>
<tr><td colspan="2">The Data may also be accessed by potential third parties when the Company considers selling or transferring part or all of its assets. In such a case, the Company will take all contractual measures to ensure that the Company's security standards are complied with, so that the Data remains secure.</td></tr>
<tr><td>INTERNATIONAL DATA TRANSFER</td><td>The Company transfers Data across national borders into or out of the EEA only when:</td><td>this is justified by business purposes; and
safeguards have been put in place to ensure that Data continues to be protected at least to the same level of protection as is required in the home jurisdiction. To ensure this level of protection for the Client's personal information, the Company may use a Data transfer agreement with the receiving third party based on the standard contractual clauses approved by the European Commission or ensure that the transfer is to a jurisdiction subject to an adequacy decision by the European Commission.</td></tr>
<tr><td>HOW DATA IS PROTECTED</td><td colspan="2">The Company implements appropriate organizational and technical measures to protect the Data against unauthorized, accidental or illegitimate access, destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing. These security measures have been implemented considering the state of the art of the technology, their cost of implementation, the risks presented by the processing and the nature of the Data, with particular attention to sensitive data. In particular, adequate awareness, confidentiality and training efforts are in place to ensure that Data is not shared with or disclosed to unauthorized persons.</td></tr>
<tr><td>HOW LONG THE DATA IS STORED</td><td colspan="2">The Data will be stored on paper and/or electronically only for the time necessary for the purposes for which they were collected, respecting the principles of storage limitation and minimization defined in art. 5.1 (c) and (e) of the GDPR.
The Data will be kept to comply with regulatory obligations and pursue the aforementioned purposes, in accordance with the principles of necessity, minimization and adequacy.
The Company may retain Data after the termination of the contractual relationship to comply with regulatory, contractual and/or tax obligations or in the event of legal action. Then, when the aforementioned reasons for processing cease, the Data will be</td></tr>
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<tr><td></td><td colspan="2">anonymized, deleted or destroyed.</td></tr>
<tr><td>
ARTIFICIAL INTELLIGENCE IN THE WORKPLACE
(Art. 11 della Legge 23 Settembre 2025, n. 132)</td><td colspan="2">In accordance with current legislation, the Company uses artificial intelligence in the workplace to improve working conditions, protect the psychophysical integrity of workers, increase the quality of work performance and people's productivity. The use of artificial intelligence must be safe, reliable, transparent and may not be carried out in contrast with human dignity or violate the confidentiality of personal data. Artificial intelligence systems will not be used to provide relevant information for the purposes of hiring or assigning an assignment, managing or terminating the employment relationship, assigning tasks or tasks or assessing the fulfilment of workers' contractual obligations.</td></tr>
<tr><td rowspan="7">RIGHTS OF THE DATA SUBJECTS
</td><td rowspan="7">Each Data Subject may exercise the following rights defined in Articles 15-22 GDPR by sending a written request to the Company at the aforementioned contact details. The data subject may also lodge a complaint with the Supervisory Authority, represented in Italy by the Italian Data Protection Authority (www.garanteprivacy.it), if he/she considers that the processing is contrary to the legislation in force and judicial recourse if he/she considers his/her rights violated.</td><td>Access: the interested party can obtain information relating to the processing of his Data and a copy of the same.</td></tr>
<tr><td>Cancellation: the data subject may request the deletion of his or her Data, within the limits permitted by law.</td></tr>
<tr><td>Objection: the data subject may object to the processing of the Data, on the basis relating to his or her particular situation. In cases of objection to the processing of Data pursuant to Article 21 of the GDPR, the Company reserves the right to evaluate the request, which will not be accepted if there are legitimate reasons to proceed with the processing that prevail over the freedoms and interests and rights of the data subject.</td></tr>
<tr><td>Rectification: if the data subject considers that his or her Data is inaccurate or incomplete, he or she may request that the same be modified accordingly.</td></tr>
<tr><td>Restriction: the data subject may request the restriction of the processing of his or her Data.</td></tr>
<tr><td>Withdrawal of consent: if the data subject has provided consent to the processing of his or her Data, he or she may withdraw it at any time.</td></tr>
<tr><td>Data portability: the data subject may receive, in a structured, commonly used and readable format, the Personal Data concerning him/her and has the right to have such Data, where requested, transferred to another controller.</td></tr>
<tr><td>PRIVACY POLICY STATUS AND UPDATE
</td><td colspan="2">This Privacy Policy was updated in Imola on 2026/10/23. The Company reserves the right to amend it from time to time.</td></tr>
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