

## PRIVACY NOTICE FOR CLIENTS, PROJECT COMMISSIONERS, PARTNERS, AND THEIR REPRESENTATIVES

This notice is issued in accordance with Articles 13 - 14 of Regulation (EU) 2016/679 concerning personal data protection and is directed towards clients (both individual businesses and professionals), partners and project commissioners, and natural persons acting on behalf of clients/project commissioners or partners. The management of the pre-contractual and contractual relationship with the data subjects inherently requires the processing of personal data (such as identifiers, phone contacts, and emails) pertaining to persons (including legal representatives, associates, employees, and collaborators). Due to the challenge of directly reaching all relevant individuals, this notice is provided to clients/project commissioners or partners with the request that they communicate it to the data subjects.



### DATA CONTROLLER

#### **Fondazione LINKS – Leading Innovation & Knowledge for Society**

Based in:: via Pier Carlo Boggio 61, 10138 Torino

Telephone: 011- 2276150

e-mail: [info@linksfoundation.com](mailto:info@linksfoundation.com)






### DATA PROTECTION OFFICER (DPO)

For inquiries related to this privacy policy or how data is handled, you can contact the Data Protection Officer "DPO" of the Data Controller at the address [privacylinks@argobs.it](mailto:privacylinks@argobs.it)



### SOURCE AND CATEGORIES OF DATA PROCESSED

The data provided by the data subject, during the pre-contractual and contractual phases, fall into the following categories: personal details, tax identification number, identity document, contact information, financial and economic data, tax data, bank details and other categories of data.

 <b>PURPOSES OF THE PROCESSING</b>	 <b>LEGAL BASIS</b>	 <b>DATA RETENTION</b>
<p>1. Establishment and management of the pre-contractual and contractual relationship (client acquisition, sending offers and quotes, contract management, sending invoice, sending communications, scheduling appointments and meetings)</p>	<p>Fulfilment of pre-contractual and contractual obligations (Art. 6 lett. b GDPR)</p>	<p>Until the statutory limitation period expires following the cessation of the relationship, as dictated by legal requirements.</p>

**FONDAZIONE LINKS** Leading Innovation & Knowledge for Society

Via Pier Carlo Boggio, 61 - 10138 Torino (Italia) T: +39 011 22 76 150

CF 97810470019 P.IVA 11904960017 PEC: [fondazione.links@pec.it](mailto:fondazione.links@pec.it)

FONDAZIONE ISCRITTA NEL REGISTRO DELLE PERSONE GIURIDICHE PRESSO LA PREFETTURA DI TORINO AL N. 365

[linksfoundation.com](http://linksfoundation.com)

COPYRIGHT ©2021 LINKS FOUNDATION



2. To comply with obligations mandated by applicable national and supranational regulations (e.g., accounting, civil law, and tax matters).	Fulfilment of a legal obligation (art. 6 lett. c GDPR)	Until the statutory limitation period expires following the cessation of the relationship, as dictated by legal requirements.
3. To establish, assert, or protect the rights of the Data Controller in legal proceedings.	Legitimate interest of the Data Controller (art. 6 lett. f GDPR)	Throughout the entirety of any current legal disputes and up until the expiration of the actionable period.



**DATA PROVISION REQUIREMENT**

Providing the data is mandatory, and failure to do so, or providing partial or inaccurate data, may result in the inability to finalize the contract and manage the contractual relationship correctly and efficiently.



**DATA RECIPIENTS**

The acquired data may be communicated and processed by:

- Authorized personnel (employees and collaborators)
- External parties appointed as Data Processors (professionals or service companies for accounting and tax assistance, corporate and legal services; electronic data processing and management of information services, e.g., electronic invoicing, clients database, etc.)

Furthermore, the data may be communicated to:

- Financial institutions for the processing of financial transactions.
- Governmental and public authorities (for instance, tax offices) as required by law.

For those interested, a detailed and up-to-date list of all entities that may receive this data can be obtained upon request from the Data Controller's office.



**EXTRA-EU TRANSFER**

The Data Controller does not transfer personal data to countries outside the European Union or to international organizations under any circumstances. However, the possibility of using cloud services is reserved; in such cases, the transfer will occur to providers operating in countries deemed adequate under Article 45 or those offering the guarantees outlined in Article 46 of the GDPR.

For more information on the transfer or to obtain a copy of the applied guarantees, please contact the Data Controller at the above-mentioned contact details.



### **RIGHTS OF DATA SUBJECTS**

Data subjects have the right to exercise the rights provided by the GDPR (Articles 15 – 22). Specifically, they may request:

- Confirmation of whether their personal data is being processed and, if so, to obtain a copy of such data (the "right of access");
- The correction of inaccurate data and the completion of incomplete data (the "right to rectification");
- The deletion of their data or the right to be forgotten, unless there are obligations to retain the data or legitimate interests of the Data Controller (the "right to erasure");
- The restriction of processing of their data (the "right to restriction of processing");
- The transfer of data they have provided to another controller (the "right to data portability"), only if the processing is based on consent or on a contract;
- To object to the processing of their personal data for reasons related to their particular situation, to be specified in the request;
- To object to automated decision-making processes and to obtain an explanation of the decisions made.
- Data subjects can exercise these rights by writing to the Data Controller at the email address mentioned above, specifying the subject of the request, the right they wish to exercise, and any relevant identification element that proves the legitimacy of the request (e.g., a copy of an identification document).



### **COMPLAINT TO THE AUTHORITY**

The data subjects have the right to submit a complaint to the Italian Data Protection Authority (art. 77 GDPR).



### **EXISTENCE OF AUTOMATED DECISION- MAKING PROCESS**

The Data Controller does not carry out processing of personal data that consists of automated decision-making processes.