

PRIVACY POLICY – EXTERNAL PEOPLE (INTERVIEWS)

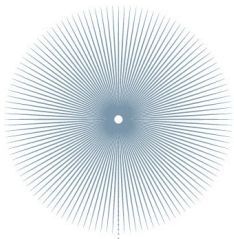
Dear Sir/Madam (hereinafter the Data Subjects)

The following paragraphs provide a series of information useful to understand how we process personal data, in compliance with the provisions on data protection and the principles of lawfulness, fairness, transparency, purpose limitation and storage, data minimization, accuracy, integrity and confidentiality.

Therefore, we encourage you to read this policy carefully, specifying that in order to obtain complete information about the processing of personal data by POLI.design, data subjects are invited to view the [privacy page](#) of the website.

1. DEFINITIONS

Privacy legislation (applicable to the protection of personal data)	Set of all legislation referring to the protection of personal data: EU Regulation 679/2016 (GDPR or RGPD), D.Lgs. 196/2003 (Code), D.Lgs. 101/2018, D.Lgs. 51/2018, Guidelines of the EDPB (formerly WP29), deontological rules and general authorizations of the Data Protection Authority, measures of the Data Protection Authority where applicable, international regulations of scope
Processing	Any operation or set of operations, performed whether or not by automated means, applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission/dissemination or any other form of making available, comparison or interconnection, restriction, erasure or destruction.
Data Controller	The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of the processing of personal data.
Personal Data	Any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is any natural person who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more characteristic elements of his or her identity: physical physiological, genetic, mental, economic, cultural or social.
Special categories of personal data (formerly sensitive)	Personal information relating to ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health status, life or sexual orientation of the data subject, as well as genetic, biometric and geo-location information.
Data related to criminal convictions and offenses	Personal information related to criminal convictions, felonies, or related security measures.



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2. THE DATA CONTROLLER

POLI.design Scrl (hereinafter POLI.design) - located in Via Don Giovanni Verità n. 25, 20158 Milan; VAT number 12878090153 – is the Data Controller, in the person of the pro-tempore Legal Representative, of your personal data as defined in the **DEFINITIONS** paragraph of this document. For any information you may contact him at the e-mail address privacy@polidesign.net.

The Data Controller has proceeded to identify and appoint a Data Protection Officer or Data Protection Officer (hereinafter DPO), who is available at the e-mail address dpo@polidesign.net.

3. ORIGIN OF YOUR DATA and CATEGORY OF DATA COLLECTED.

The Data Controller, for the purpose of establishing and managing relationships with external parties, processes non-particular data. Specifically, POLI.design processes its personal, contact, tax and image-related data. These data are collected directly from the data subjects.

4. PURPOSE OF THE PROCESSING and LEGAL BASIS OF THE PROCESSING.

A. Accounting and tax obligations

Your information will also be processed for the purpose of proper accounting and tax records as well as for purposes of entering into and maintaining contracts. This will be done for contractual purposes and for legal obligations.

B. Images

Your images may be collected and processed by POLI.design for Advertising and Marketing Activities: these are photos and videos collected for the purpose of publication on POLI.design's official channels. Such processing may take place only by virtue of express consent.

However, in the case of educational partners, it is specified that they may only process data with regard to the competencies, outlined within the appointment's ex art. 28 GDPR, or appointeeships to which they are entitled. Therefore, for any further data processing they will necessarily have to request consent from POLI.design.

5. MANDATORY REPORTING OF DATA

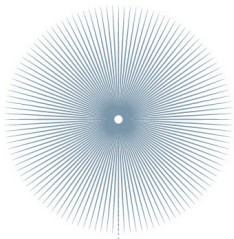
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The provision of the requested personal data is not compulsory for the purposes contained in the paragraph PURPOSE OF THE PROCESSING and LEGAL BASIS of this information notice, however, in the absence of the requested data it is possible that POLI.design will not be able to properly provide the requested service. With regard to the processing carried out by virtue of consent (and, therefore, the collection and publication of images, contact for marketing purposes, sharing with third parties) the same are possible only in the presence of its appropriate consent. Please note that consent is never mandatory and that, even once given, it is revocable at any time, without affecting the processing carried out in its force.

6. PLACE OF DATA PROCESSING and MODALITIES OF DATA PROCESSING.

We generally try to avoid data transfers outside the European Union. In any case, it is understood that the Data Controller, should it become necessary, will be entitled to transfer data to countries outside the EU, taking care to adopt all the guarantees provided by the GDPR in this regard.

All processing operations are carried out by means of computer/electronic tools, including automated ones, and on paper.

7. COMMUNICATION OF YOUR DATA TO THIRD PARTIES

The Data Controller may communicate your data to the Public Administration, Revenue Agency and/or Judicial Authorities, as well as to all other subjects to whom the communication is obligatory or necessary by law.

Outside of these subjects, who may come into contact with your personal data by virtue of the existing relationship with POLI.design, which has specifically appointed them as "Data Processors" pursuant to Article 28 of the GDPR, the aforementioned data will not be communicated to other subjects or disseminated. The list of Data Processors can be consulted upon request.

8. RETENTION PERIOD OF COLLECTED DATA

Your personal data will be kept until you opt - out, unless the purpose for which POLI.design collected the data is exhausted.

9. YOUR RIGHTS

The Data Subjects have the right to obtain, in the cases provided for, access to their personal data and the rectification and/or cancellation of such data and/or the limitation of the processing that concerns them and/or to oppose the processing (Articles 15 et seq. of the GDPR). The appropriate request is to be submitted directly to POLI.design at the contact details indicated in the paragraph **DATA CONTROLLER** of this policy. The Data Subjects who

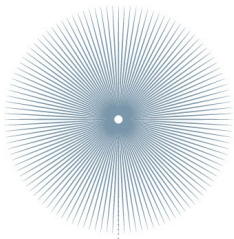
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believe that the processing of personal data, carried out according to the methods indicated herein, takes place in violation of the provisions of the GDPR, have the right to lodge a complaint with the Supervisor Authority, as provided for in Art. 77 of the GDPR itself, or to take appropriate legal action (Art. 79 of the GDPR).

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