

PRIVACY POLICY

The TFT Building Management Srl, with based in Rome Viale Parioli 37A - 00197, CF and VAT 03789701004 (hereinafter "TFT" or "Holder"), as data controller, informs you pursuant to art. 13 D.Lgs. 30.6.2003 n. 196 (hereinafter, "Privacy Code") and art. 13 EU Regulation n. 2016/679 (hereinafter, "GDPR") that your data will be processed in the manner and for the following purposes:

1. Object of the Treatment

The Holder processes personal and identifying data (for example, name, surname, company name, address, telephone, e-mail, bank and payment references, of a judicial nature) - hereinafter, "personal data" or "data") you have communicated on the conclusion of contracts for the services provided by TFT.

2. Purpose of the processing

Your personal data are processed:

A) without Your express consent (Article 24 letter a), b), c) Privacy Code and art. 6 lett. b), e) GDPR), for the following Service Purposes:

- to conclude the contracts for the services provided by TFT;
- to fulfill the pre-contractual, contractual and tax obligations arising from relationships with You;
- to fulfill the obligations established by law, by a regulation, by EU legislation or by an order of the Authority (such as for anti-money laundering);
- to exercise the rights of the Owner, such as the right to defense in court;

B) Only upon Your specific consent (articles 23 and 130 of the Privacy Code and article 7 of the GDPR), for the following information purposes:

- to send You e-mail, mail and / or text messages and / or telephone contacts, newsletters;

3. Processing methods

The processing of Your personal data is carried out by means of the operations indicated in art. 4 of the Privacy Code and art. 4 n. 2) GDPR and more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your personal data are subjected to both paper and electronic and / or automated processing.

The Data Controller will process the personal data for the time strictly necessary to the abovementioned purposes and in any case for no more than 10 years from the termination of the relationship for the purposes of service.

4. Access to data

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B):

- to employees and contractors of TFT in their capacity as persons in charge and/or internal managers of the processing and/or system administrators;
- to third-party companies or other subjects (as for example professional offices, consultants, etc.) who carry out outsourcing activities on behalf of the Data Controller, as external data processors.

5. Data communication

Without the need for express consent (pursuant to Article 24 letter a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Data Controller may communicate Your data for the purposes referred to in art. 2.A) to Supervisory Agencies (such as IVASS), Legal Authorities, as well as to those subjects to whom the communication is mandatory by law for the accomplishment of the stated purposes. These subjects will process the data in their capacity as independent data controllers. Your information will not be disseminated.

6. Data transfer

Personal data are stored on servers located at the registered office of the Owner.

7. Nature of the provision of data and consequences of refusal to reply

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we will not be able to guarantee the requested Services.

8. Rights of the interested party

As an interested party, You have the rights set forth in art. 7 of the Privacy Code and art. 15 GDPR and precisely the rights to:

- obtain confirmation of the existence or not of personal data concerning You, even if not yet registered, and their communication in an intelligible form;
- request access to personal data and information relating to them;
- obtain the indication: a) of the origin of personal data; b) of the purposes and methods of processing your data; c) of the logic applied in case of processing the information with electronic instruments; d) of the identification details of the Owner, the managers and the designated representative pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, GDPR;
- e) of the subjects or categories of subjects to whom the personal data may be communicated or

who may become aware of it in their capacity as designated representative in the territory of the State, managers or agents;

- obtain: a) updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) the attestation the operations referred to in letters a) and b) have been brought to the attention, also as regards to their content, of those to whom the data have been communicated or disseminated, except in the case where such fulfillment is impossible or involves the use of means manifestly disproportionate to the protected right;

- object, in whole or in part: a) for legitimate reasons to the processing of personal data, even if pertinent to the purpose of collection; b) to the processing of personal data for the purpose of sending material other than what is necessary for the performance of the service (for example advertising or direct selling or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and/or through traditional marketing methods by telephone and/or paper).

Where applicable, the User also has the rights referred to in Articles 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), the right of revocation of consent granted at any time, as well as the right of complaint to the Authority Guarantor.

9. How to exercise rights

You can exercise your rights at any time by sending:

- a registered letter at TFT Building Management Srl - Viale Parioli 37A - 00197 Rome;
- an e-mail to tftm@tft.net

10. Holder, manager and agents

The Data Controller is TFT Building Management Srl based in Rome, Viale Parioli 37A

The updated list of data processors and data processors is kept at the registered office of the Data Controller.