PRIVACY	DATA CONTROLLER
13, Regulation (EU) 2016/679 (GDPR) and Legislative Decree 196/2003 and 101/2018	R2M SOLUTION S.R.L.

Attachment. Privacy information to customers on the processing of personal data

INFORMATION ART. 13, REGULATION (EU) 2016/679

THE DATA CONTROLLER R2M SOLUTION SRL

provides you with the following information in order to make you aware of the characteristics and methods of processing your personal data.

R2M SOLUTION SRL, in the person of its legal representative pro tempore
PAVIA (27100 - PV) Via Fratelli Cuzio, 42
VAT 04998380879
Email: **privacy@r2msolution.com** Pec: **r2msolution@legalmail.it**
operates as Data Controller in the development, consulting, production and marketing of innovative products and services and guarantees maximum confidentiality in the processing of your personal data, their accuracy, and their updating, as established by current legislation on the protection of personal data.

DPO: dpo_privacy@r2msolution.com

OBJECT OF THE TREATMENT

The Data Controller processes personal data (for example name, surname, physical address, province and municipality of residence, landline and / or mobile phone, tax code, VAT number, company name, personal e-mail, bank and payment details, eg IBAN), hereinafter "personal data", communicated by you on the occasion of the conclusion of contracts for the services and products offered and / or for information purposes. If the requested service is a webinar or an assimilated service, geolocation data, images, audio and video data may also be processed.
Email communications sent and received may be archived within the Company's systems (including any Customer Relationship Management (CRM) platforms). Such communications may be retained and

processed for commercial, organizational, and administrative purposes, with access restricted to duly authorized personnel only.

PURPOSE OF THE PROCESSING

a) ***registrations and requests for contact and / or sending of informative material***

Purpose: your personal data will be processed to provide information or respond to requests received from the interested party and / or to send informative material requested by the same.

Legal basis: fulfillment of the contract and pre-contractual measures, art. 6.1.b) GDPR.

Conservation: your personal data are kept for 10 years, as required by the ordinary limitation period (Article 2946 of the Civil Code), without prejudice to further conservation in the event of interruption of the prescription, and archiving needs, as applicable.

b) ***For the management of the contractual relationship***

Purpose: the data will be processed for the management of your registration and participation in the event promoted or organized by the owner or to carry out the activities related to the acquisition of one of our services or products, for the provision of the service itself, for the relative invoicing and for payment management, as well as for the fulfillment of any other obligation deriving from the contract, to fulfill the obligations established by law, by a regulation, by community legislation or by an order of the Authority (for example in the field of anti-money laundering). They could also be processed to assert the constitutional rights of defense and for the exercise of rights recognized to R2M SOLUTION, both in court (including pre-litigation) and out of court (for example, in the event of disputes relating to the correct execution of the contract).

Legal basis: fulfillment of the contract and pre-contractual measures, art. 6.1.b) GDPR, fulfillment of legal obligations.

Storage: your personal data are kept for the entire duration of the contract, after which they will be kept for 10 years, as required by the ordinary limitation period (Article 2946 of the Civil Code), without prejudice to further conservation in the event of interruption of the prescription, and archiving needs, as applicable.

If the Data Controller intends to further process your personal data for a purpose other than that for which they were collected, before such further processing, it will provide you with information regarding this different purpose and any further relevant information, as well as the request for consent where necessary.

c) For the elaboration and / or development of European projects or for participation in them

Purpose: if it is consistent with the purpose of the collection and taking into account the object of the R2M SOLUTION activity, the data may be processed for the processing or development of European projects in which the Data Controller, for various reasons, participates. The principle of minimisation will always be respected

Legal basis: legitimate interest of the owner and fulfillment of legal obligations.

Retention: the data is kept for the duration of the project and for the following 10 years. It should be noted that, since there is a sharing of data with the consortium, the definitive and effective cancellation

is linked to the policies of the consortium itself or of the individual recipients of the data. More information is available from the Data Controller.

d) Tracking of informational and promotional emails (tracking pixels and tracked links)

Personal data are processed using tracking tools to measure the effectiveness of communications and improve their content, relevance and frequency. The legal basis for this processing, pursuant to Article 122(1) of Italian Legislative Decree No. 196 of 30 June 2003, is the data subject's consent under Article 6(1)(a) of the GDPR. Consent for this purpose is optional and may be withdrawn at any time. The data subject may also withdraw consent solely to tracking while continuing to receive communications without any adverse consequences.

CONSEQUENCES OF REFUSAL TO PROVIDE DATA

The collection and processing of personal data is necessary to follow up the requested services. If you do not wish to provide the personal data expressly provided as necessary, the Data Controller will not be able to perform the processing related to the management of the services requested and / or the contract, nor the obligations deriving from it. Failure to provide data necessary to comply with a legal obligation (for example, billing) could be a source of liability for the interested party.

In relation to photo, video, audio data, where it is not expressly functional to the requested service and technically possible, the interested party may request that the processing is not carried out. In relation to the purpose sub c, the interested party may request that the processing is not carried out.

HOW YOUR DATA IS PROCESSED

R2M Solution SRL informs you that the processing of your personal data takes place in compliance with the principles of lawfulness, correctness and transparency of the treatment. R2M Solution SRL guarantees that the data processed will be adequate, relevant and not excessive with respect to what is necessary for the purposes of the processing (principle of data minimization). The data are processed in electronic and paper format, through suitable tools to guarantee security and confidentiality, in compliance with the provisions of Chapter II (Principles) and Chapter IV (Data Controller and Data Processor) of the Regulation.

The processing may also be carried out through automated tools to store, manage or transmit the data and, in any case, will be carried out in compliance with the provisions of the Regulation.

The processing of your personal data is carried out by means of what is indicated in art. 4, n. 2) of the Regulation, or collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination, or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.

The Data Controller uses appropriate security measures to preserve the confidentiality, integrity and availability of your personal data and imposes similar security measures on third-party suppliers and data processors (if any). Your personal data are stored in paper, computer and telematic archives located in countries where the GDPR applies (EU countries) or where similar security measures are guaranteed.

RECIPIENTS

The data will not be disclosed and may be known, within the necessary limits and for the purposes indicated, by employees and collaborators of R2M SOLUTION SRL, authorized pursuant to art. 29 of the Regulation. They may also be disclosed to third parties, as independent or joint data controllers, or as external data processors, pursuant to art. 28 of the GDPR as:

- companies that provide professional services for the company
- external consultants.

The data could also be transmitted to the Public Security Authority following a request as well as to the Judicial Authority, in case of need.

Furthermore, the data may be communicated to third parties in the context of EU projects to which the owner in various capacities participates and / or contributes.

The complete list of subjects to whom personal data have been or may be communicated is available upon request to be made through the addresses indicated at the beginning of this document.

No automated decision-making treatments are carried out.

The subjects to whom the personal data processed by the Data Controller refer have the right at any time to exercise the rights provided for by Regulation (EU) 2016/679 (GDPR).
Requests must be addressed:
R2M SOLUTION SRL - postal address: PAVIA (27100 - PV) Via Fratelli Cuzio 42
or via Email: privacy@r2msolution.com Pec: r2msolution@legalmail.it

In particular, the interested party has the right to obtain from the Data Controller:

1. confirmation as to whether or not personal data concerning him or her are being processed and, in this case, to obtain access to personal data and related information (Article 15);
2. the correction and deletion of data (articles 16 and 17);
3. the limitation of data (art. 18);
4. the attestation that the operations referred to in points 2) and 3) above have been brought to the attention of those to whom the data have been communicated, except that this fulfillment is not impossible or involves a disproportionate use of means (Article 19);
5. the right to data portability (art. 20);
6. the right to object to our data processing (Art. 21);
7. the right to object to automated decision-making concerning individuals, including profiling (Article 22);
8. the right to withdraw your consent at any time (art. 7).

R2M SOLUTION SRL will respond to requests within 1 (one) month, except in particularly complex cases, for which it may take up to 3 (three) months. In any case, R2M SOLUTION SRL will explain the reason for the waiting time within 1 (one) month of the request.
The result will be provided in writing or in electronic format. In the event that rectification, cancellation and limitation of data processing are requested, R2M SOLUTION SRL undertakes to communicate the results of the requests to each of the recipients of the data, unless this proves impossible or involves a disproportionate effort. The withdrawal of consent does not affect the lawfulness of the processing based on the consent given before the revocation.

Without prejudice to any other administrative or judicial action, you have the right to lodge a complaint with the supervisory authority. It is therefore possible to contact the Guarantor for the protection of personal data at the addresses indicated on the website www.gpdp.it

The data you provide may be transferred to the countries of the European Union or to third countries with respect to the European Union, for reasons related to the processing tools used. The transfer may be based on an adequacy decision or on the Standard Contractual Clauses approved by the European Commission. More information is available from the owner.

The Data Controller asks the interested parties to keep the data provided updated. The data provided can be corrected by contacting the Data Controller by:

Email privacy@r2msolution.com Pec: r2msolution@legalmail.it

By providing data, the interested party declares and guarantees that all the data provided are correct and truthful and that they do not refer to any other person.