

PRIVACY NOTICE ON PERSONAL DATA PROCESSING WITHIN THE MEANING OF REGULATION (EU) 2016/679

Dear customer,

the undersigned Vincenzo Cassullo, born in Sant 'Angelo Limosano (CB) on 16/07/1950, domiciled, for the purposes of this letter, at the real estate brokerage firm **N-RETAIL S.r.l. IMMOBILIARE VISTA LAGO**, with registered office in via Giulini n.12 Como, tel. 031.3370660, e-mail address: info@vista-lago.it pec address: n-retail@legalmail.it (hereinafter the "Agency"), represented by the same and in the capacity of "Data Controller" (hereinafter "Owner") of your personal data (hereinafter, cumulatively, also "Data"), of which you are the "Interested", pursuant to EU Regulation 2016/679 (hereinafter "Regulation"), and of which the Agency is entered into possession for assignment of mediation assignment or for having accessed a specific section of our website www.vista-lago.it, provides the following information so that you can give specific, unequivocal, informed, free and aware consent to the processing of the Data that may also take place with IT and / or telematic tools.

- 1. The data necessary for the performance of the contractual relationship between the Parties, as well as the data otherwise acquired as part of this activity, are collected by the Agency directly from the interested party and /or through third parties, as well as obtained by consulting some public and private external databases.
- **2.** The Agency provides the opportunity to consult this information:
- a. every time it collects the personal data of the Customers;
- **b**. each time an express request is made to the Data Controller;
- c. through web consultation by visiting the home page of the website www.vista-lago.it
- **3.** The Agency for its own institutional purposes, connected or instrumental to the activity, processes your data for the following purposes:
- **a.** purposes related to the obligations established by laws, regulations and community legislation as well as by provisions issued by Authorities legitimated by the law or by supervisory and / or control bodies;
- **b.** contractual purposes, connected and instrumental to the establishment and management of customer relations, such as the acquisition of preliminary information for the possible conclusion of a contract.
- **c**. detection of the degree of satisfaction with the quality of services, performed directly by the Agency or through the work of specialized companies through personal or telephone interviews, interactive questionnaires, market surveys;
- **d.** promotion of the Agency's products and services by sending advertising material, telephone contacts and any other form of electronic communication (sending e-mails, sms, mms, publication on social networks);
- **e.** communication and / or transfer of data to third parties for the promotion and / or sale of products and services, using traditional and / or automated methods. With reference to the purposes referred to in points c, d, e, we inform you that, at any time, you will be free to revoke the consent expressed in the manner specified in this statement.
- **4.** You have the right to know that the provision of data may be compulsory or optional, as well as having consequences in the event of a refusal. In this regard, I specify that:
- **a.** the granting of your consent for the purposes referred to in letters a. and b. of point 3 is mandatory in nature as required by law or to follow up on contractual obligations (as indicated in Article 6, paragraph 1, letter b and c) of the Regulation). The refusal of your consent for the purposes indicated in letter b. of point 3. Therefore, it will not allow the Agency to carry out the assignment you have conferred on it or to reach the conclusion of the contract of which you are a party;
- **b.** the refusal to process the data for the purposes referred to in letters c., d., e. of point 3 is, on the other hand, optional, it will not entail any prejudicial consequences and may be revoked by you at any time, limited to the purposes related to the sending of advertising material, detection of the degree of satisfaction with the quality of services, fulfillment of market research or commercial communication, through telephone contacts or any other form of electronic communication (sending e-mails, sms, mms, whatsapp, publication on websites, social networks, etc.), carried out directly by the Agency or through the work of specialized companies through personal or telephone interviews, interactive questionnaires.
- **5.** Art. 9 of the Regulation defines particular data suitable for revealing racial and ethnic origin, political opinions, religious or philosophical beliefs or membership in trade unions, as well as genetic and biometric data, data relating to health or sexual life or to the sexual orientation of the person. It is possible that the Agency may be in possession of particular data in relation to the specific operations requested by the

interested party. In this case, the interested party has the right to express specific consent to the processing of their sensitive data and the Agency may use them only to the extent necessary to be able to perform the services and operations requested.

- **6.** The Data will be kept for the time necessary to manage the contractual relationship and fulfill legal obligations, with particular reference also to the anti-money laundering legislation. The Data are always processed in full compliance with the principle of proportionality of the processing (Article 5, paragraph 1, letter c) of the Regulation), on the basis of which all Personal Data and the various methods of their processing must be relevant and not exceeding the purposes pursued, in order to guarantee adequate security and confidentiality, also to prevent unauthorized access or use of personal data and equipment used for processing, as well as lawful and correct processing.
- **7.** By virtue of the provisions of art. 13, paragraph 2, lett. a) of the Regulation, indications are given below regarding the retention times of the Data based on the different purposes of the processing:
- with reference to letters **a.** and **b.** of point **3**. the Data are kept for the period necessary to manage the contract and fulfill legal obligations;
- with reference to letters **c. d. e.** of point 3, the storage times are set at 10 years.
- **8.** In relation to the purposes indicated in point 3, the Personal Data may also be processed by a "Manager", that is the natural person or company, even outside the Agency, who may be entrusted with specific and defined management and control tasks of the data processing, and by one or more "Person in charge / s", who will process or materially use the Data on the basis of the instructions received from the Owner or Manager (subjects who, if not expressly indicated in this information, are consider themselves not yet designated, and not necessarily to be designated if the processing is occasional, and whose data will be provided to you in the event of their designation). Again in relation to the aforementioned purposes, the Data may be processed using manual, computerized and / or otherwise automated tools according to logics strictly connected to the purposes of the processing and, in any case, in order to guarantee their security and confidentiality even in the case of processing using tools, remote communication.
- **9.** The Data could be transferred to countries of the European Union and to third countries (ie non-members of the European Union) exclusively for the purposes referred to in letters a) and b) of point 3. In this case, the intention to transfer personal data must be communicated to you in advance and authorized by you only if a level of data protection adequate to the European one is guaranteed.
- 10. The Data, by reason of the relationship established and in order to facilitate and allow the conclusion of the deal, may be disclosed to: i) external collaborators; ii) other business agents in mediation (including companies) identified by the Owner in order to collaborate for the performance of the assignment entrusted by the interested party; iii) banks and other entities operating in the banking sector; iv) counterparties and their possible technicians and consultants; v) notaries for the purpose of preparing notarial deeds and / or related activities

relating to the assignment given to the Owner; vi) companies and / or professionals who perform services for the performance of technical / cadastral / building / urban planning practices; vii) insurance for the purpose of stipulating policies relating to the assignment given to the Holder; viii) websites for real estate advertising purposes; ix) boards of arbitrators and, in general, all those public and private subjects to whom communication is necessary for the correct fulfillment of the purposes indicated in point 3); x) Supervisory / Control Bodies and other Authorities, for purposes related to the obligations established by law (anti-usury law, anti-money laundering legislation) and / or by regulations, as well as by provisions issued by the same Authorities. All subjects, belonging to the categories to which the Data may be communicated, will use the Data as "owners" pursuant to the law or specific consent, in full autonomy, being unrelated to the original processing carried out at the Agency, or of "external managers". To know at any time the subjects to whom your data will be communicated, it is sufficient for you to request the updated list by writing to the Data Controller at the headquarters of the Agency. Finally, your data will be known by all employees and collaborators of the Agency, designated managers and / or persons in charge of processing, in relation to the performance of the duties and tasks assigned to each. The Data processed by the Agency will not be disseminated.

- **11.** Within the limits and under the conditions provided for by art. 15 23 of the Regulations, the Agency guarantees and recognizes the exercise of the following rights:
- the right to access personal data in their paper and / or electronic archives;
- the right to request rectification, updating and cancellation, if incomplete or erroneous, as well as to oppose their processing for legitimate and specific reasons;
- the right to obtain the correction of inaccurate personal data without undue delay. Taking into account the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, also by providing an additional declaration;
- the right to obtain the cancellation of personal data concerning him without undue delay if one of the reasons referred to in art. 17, paragraph 1 of the Regulations;
- the right to obtain the limitation of processing when one of the hypotheses referred to in art. 18, paragraph 1 of the Regulations;
- the right to data portability within the limits and in the manner provided for by art. 20 of the Regulation. Furthermore, at any time, you have the right to withdraw consent to the processing of your data without prejudice in any way to the lawfulness of the processing based on the consent given prior to the revocation, as well as to oppose the processing for marketing purposes at any time (right to object). You have the right to receive information relating to the action taken regarding one of the aforementioned requests or the effects arising from the exercise of one of the aforementioned rights, without undue delay and, in any case, at the latest within one month of receipt of the request, extendable, if necessary, by two months; he also has the right to lodge a complaint with a supervisory authority and to lodge a judicial appeal. Without prejudice to the case in which the processing of the Data violates the general principles dictated by the Regulation, the exercise of these rights must be relevant and motivated and may not imply the revocation of the consent given or the request for cancellation of the Data provided by you for the conclusion and execution of the contract referred to in point 3. letters a. and b., to the extent and for as long as the Data is necessary for that purpose. The rights in question may be exercised, also through a person in charge, by sending a request to the Data Controller or Data Processor at the following addresses:

N-Retail S.r.l unipersonale Immobiliare Vista Lago Via Volta, 1/3 (via Garibaldi)- 22100 Como tel. 031.3370660 e-mail address: info@vista-lago.it, pec address: n-retail@legalmail.it.

In exercising your rights, you may grant, in writing, a proxy or power of attorney to individuals, organizations, associations or organizations; he may also be assisted by a trusted person. The Agency, to ensure the effective exercise of your rights, will take appropriate measures to facilitate access to the Data, to simplify the procedures and to reduce the time required to respond to your request.

Finally, it should be noted that you can lodge a complaint with the supervisory authority or the Guarantor for the Protection of Personal Data through the following means:

- **a**) registered letter with return receipt addressed to the Guarantor for the protection of personal data, Piazza di Monte Citorio n. 121 00186 Rome;
- **b)** e-mail to the address: garante@gpdp.it or protocol@pec.gpdp.it;
- **c)** fax to the number: 06. 69677.3785

All relevant information on complaints that can be proposed by the interested party is available on the website of the Guarantor at www.garanteprivacy.it

12. The data controller is Vincenzo Cassullo.

The list of any persons responsible for the processing of personal data is available at the offices of the owner and can be requested at any time.