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www.economistiassociati.com

Privacy Statement

This is the privacy statement ('Statement') of Economisti Associati srl (EA). This Statement provides information on why and how EA collects, processes and discloses personal data and what EA undertakes to protect it.

This Statement is also applicable to Consorzio Italiano Consulenti srl (CIC), which is controlled by EA. In this Statement, expressions like “we”, “us” or “our” collectively refer to EA and CIC.

1 About Us

EA is a consulting firm providing advisory services on socio-economic development and public policy. Established in 1992, EA primarily provides services to international organisations, such as the European Commission and the World Bank. EA operates the website <http://www.economistiassociati.com/>

EA is committed to protect personal data in line with the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, commonly known as General Data Protection Regulation (GDPR).

Our contact details are as follows

Registered office in Bologna, Via San Felice 6

Phone +39 051 6569606

Facsimile +39 051 4689644

Email main@economistiassociati.com

2 Definitions

Personal Data. Any information that relates to a living individual who can be identified from that data. Different pieces of information that can lead to the identification of a particular person when they are collected together also constitute Personal Data.

Data Subject. The identifiable person whose Personal Data is collected. Any Data Subject has the right to access, correct, update or request deletion of his/her Personal Data collected by EA.

Sensitive Data. Includes Personal Data that is, by its nature, particularly sensitive in relation to fundamental rights and freedoms, such as details concerning: (i) race or ethnicity; (ii) religious or philosophical beliefs; (iii) sex life and sexual orientation; (iv) political opinions and trade union membership; (v) health and genetic and biometric data; and (vi) criminal convictions and offences. EA normally does not collect any Sensitive Data. In the unlikely case we were to collect Sensitive Data this would only be done after receiving an explicit consent from the Data Subject(s) concerned.

Data Controller. A person or organization that decides why and how the collected Personal Data is processed, and is responsible for the protection of that data. EA is a data controller for Personal Data we collect through the activities referred to in this Statement.

Data Processing. Any operation or set of operations that is performed on Personal Data, whether or not by automated means, such as recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.



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Data Processor. A person or organization that processes the Personal Data on behalf of the Data Controller. In certain cases (e.g. when carrying out surveys for the European Commission), EA may also act as Data Processor.

3 Categories of Personal Data Collected

We may collect the following types of Personal Data:

- Identity Data, including first and family name, username or similar identifier, date of birth, gender, marital status, education level, language proficiency, VAT number and Tax Identification Number;
- Contact Data, including billing address, delivery address, email address, and telephone/facsimile number;
- Financial Data, including bank account and payment card details;
- Transaction Data, including details about payments to and from clients/suppliers/employees and other details of services purchased from us;
- Survey Data, including the information provided by individuals, in their own capacity or as representatives of legal entities, through participation in interviews or surveys;
- Usage Data, including information about the use of our website.

4 Ways in Which Personal Data is Collected

Personal Data is typically collected by us through **direct interaction**, i.e. by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes notably the information provided through participation in surveys, interviews, panels, focus groups and similar research methods that provide evidence for our consulting activities. Personal data may also be collected through: (i) **third parties** (namely, search information providers, intermediary organizations, data brokers or data aggregators) and (ii) **publicly available sources** (namely, individuals' or organizations' websites, company registration bodies and the like).

5 Uses of Personal Data

Personal Data are only used for legitimate purposes allowed under applicable law. In general, we will use Personal Data in the following circumstances: (i) when we need to perform a contract; (ii) when it is necessary for our legitimate interests and the interests and fundamental rights of the Data Subject do not override our legitimate interests; and (iii) when we need to comply with a legal or regulatory obligation.

In general, we deem that there is consent to the use and processing of Personal Data whenever there is an affirmative statement or clear action, such as the ticking of a box or accepting an invitation to participate in a survey or in an interview.

We will only use Personal Data for the purposes for which it was collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

6 Disclosure of Personal Data

Whenever we act as Data Processor on behalf of a client (e.g. in the case of assignments with the European Commission involving surveys, interviews and the like), the Personal Data will be disclosed in full to the client. However, in deliverables for publication, Personal Data will normally be anonymized and reported only in aggregate form.

As Data Controller, we may need to disclose Personal Data with the following providers of services ('Service Providers'):



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- Service providers acting as processors who provide IT and system administration services;
- Service providers acting as processors who provide survey services and analysis;
- Professional advisers acting as processors who provide consultancy, banking, legal, insurance and accounting services.

We require Service Providers to respect the security of Personal Data and to treat it in accordance with the law. We do not allow our Service Providers to use Personal Data for their own purposes and only permit them to process Personal Data for specified purposes and in accordance with our instructions.

Our Service Providers are usually located in the European Union and therefore are subject to the same legal obligations under the GDPR. Should we need to transfer Personal Data to Service Providers located outside the European Union, we will ensure that a similar degree of protection is granted.

7 Data Security

We have put in place appropriate security measures to prevent Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to Personal Data to those employees, agents, contractors and Service Providers who have a justified need-to-know. All these employees, agents, contractors and Service Providers will only process Personal Data on our instructions and they are subject to a duty of confidentiality.

8 Data Retention

We will only retain Personal Data for as long as it is necessary to fulfil the purposes we collected it for, including for the purposes of fulfilling relevant legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the volume, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure, and the purpose for which we process Personal Data.

Please note that some of EA's consulting assignments span over several years. Accordingly, we may retain Personal Data for a correspondingly long period of time. In addition, in accordance with law, we are required to keep information about our clients and suppliers (including Identity, Contact, Financial, and Transaction Data) for five years after the closure of the fiscal year during which we interacted with them for tax purposes. Furthermore, contracts with certain clients (namely, the European Commission) require us to keep information, including some Personal Data, about our activities for periods sometimes exceeding ten years from the moment of collection.

In case Personal Data has been anonymized, so that the information can no longer be associated with a Data Subject, they may be retained indefinitely.

9 Miscellaneous

Cookies. Cookies are not used to transmit Personal Data. Persistent cookies and user tracking systems are not used by us. The use of the so-called session cookies is strictly limited to the transmission of session identification data necessary to permit the safe and efficient exploration of the website.

Marketing. EA does not engage in direct marketing activities and does not provide any Personal Data to entities engaged in on-line marketing. Personal Data collected by EA will never be used for marketing purposes.



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Amendments. This Statement was last updated on 16 May 2018. EA reserves the right to unilaterally modify or update this Statement without prior notice. Therefore, we encourage you to regularly review the Statement via our website. In case substantive adjustments are made, a notification will be made available on our website.

Third Partly Links. EA's website includes links to third-party websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and we are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

10 Rights of Data Subjects and Related Contacts

At all times, you as well as any other Data Subject have the right to:

- Request that we allow you to inspect your Personal Data;
- Request that we provide you with an electronic copy of your Personal Data;
- Request that we rectify your Personal Data;
- Request that we erase your Personal Data;
- Request that we provide you with information regarding the processing of your Personal Data;
- Object to the processing of your Personal Data.

In order to obtain information on our data protection policy and exert the rights indicated above, you as well as any other Data Subject should contact:

Ms. Elisabetta Rizzoli
Economisti Associati srl
Via San Felice 6
Phone +39 051 6569606
Facsimile +39 051 4689644
privacy@economistiassociati.com

If you are not satisfied with the way in which your request(s), you as well as any other Data Subject are entitled to lodge a complaint with the relevant data protection authority. Contact details for data protection authorities in EU countries are available at https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).