



GOSP - Generali Operations Service Platform S.r.l.
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generali.com

1. Generali Operations Service Platform S.r.l. processes your personal data

Generali Operations Service Platform S.r.l. (hereinafter also “the Company”), having its registered office at no. 2, Piazza Duca Degli Abruzzi, Trieste, Italy processes your personal data as Data Controller.

If you wish to receive more information, you can use the following postal address:

- Generali Operations Service Platform S.r.l., Piazza Duca degli Abruzzi no. 2, 34132 Trieste, Italy .

For any questions or if you wish to exercise a right in respect of the processing of your personal data, you can contact our *Data Protection Officer*:

- By email at: GOSPdpo.it@generali.com
- By traditional mail at: → Generali Operations Service Platform S.r.l., Via Machiavelli n. 3, 34132 Trieste, Italy to the attention of the Data Protection Officer

2. How we use your personal data and on the basis of which ground

We process your personal data in the context of the pre-contractual or contractual relationship we establish with you, with the purpose of performing all necessary activities for the implementation of the contractual relationship that may be established, including, for example:

- i. Implementation of the contracts in force and performance of the Company’s administrative, accounting and fiscal activities;
- ii. Fulfillment of obligations set forth by any Italian or EU laws and regulations as well as any other acts issued by supervisory and control Authorities;
- iii. Organisation and management of the work activities assigned to you for the implementation of the agreement in force;
- iv. Sue and take legal actions as well as exercise the Company’s right of defence;
- v. Allow the Company to carry out or take part, manage as well as plan corporate transactions, such as merger, acquisitions and restructuring.

Processing of your personal data for the purposes indicated under the previous points (1) and (3) is a processing necessary to perform the agreements in place with you.

Processing of your personal data for the purpose indicated under the previous points (2) is a processing necessary to allow the Company to comply with the obligations to which it is subject.

Processing of your personal data for the purposes indicated under the previous points (4) and (5) is based on the Company’s legitimate interest, to the extent that this is strictly necessary to pursue this legitimate interest and based on a proper balancing with your fundamental rights and freedoms.



3. Why the provision of your personal data is required

For managing our relationship, communication of your personal data is required since necessary to comply with obligations contained in the contracts or the law.

Therefore, the failure in the communication or the partial or inaccurate communication may have, as consequence, the impossibility to carry out the activities required by applicable laws and prevent the Company from complying with its contractual and legal obligations.

4. Which personal data we use

We process only the personal data¹ strictly necessary to achieve the purposes above indicated. We mainly process:

- i. Biographical and identification data
- ii. Contact data
- iii. Data relating to criminal convictions and offences,

in addition to any other personal data provided by you, if any.

5. With whom we share your personal data

Our staff processes your personal data with modalities and procedures, also in electronic form, appropriate to ensure an adequate level of security.

Your personal data can be shared only with third parties which have been assigned with the task to perform some activities concerning your relationship with the Company. Depending on the activity performed, such third parties may act as Data Processors*, Joint Controllers* or autonomous Data Controller².

Our staff and third parties which process your personal data for the purposes above indicated – exception for autonomous Data Controllers – receive proper instructions about the correct modalities of the processing. Your personal data are not disseminated.

6. Where we transfer your personal data

As a general rule, we do not transfer your personal data in Countries outside the European Economic Area.

¹ Personal data can be provided directly by you or collected by public sources (lists, records, public documents known by anyone), as well as collected from third parties (including, for example, companies of Generali Group, employer, etc.).

² Third parties perform computer, telematics, financial, administrative, filing, printing of the correspondence, management of incoming and outgoing correspondence and financial auditing activities. Third parties may also include other public and private entities, such as the Ministry of Economy and Finance (Italian Tax Authority) or tax collection agencies, as well as Group companies.



In exceptional cases, limitedly for the purposes indicated above, we may transfer your personal data to a third party above described or to a public body requesting it, also in Countries outside the European Economic Area.

In any case, the transfer of your personal data is performed in compliance with the applicable laws and international agreements in force, as well as on the basis of appropriate and suitable safeguards (such as, for example, transfer to a Country ensuring an adequate level of protection or adopting the standard contractual clauses approved by the EU Commission).

7. The rights you can exercise in respect of the processing of your personal data

You can exercise the following rights in respect to your personal data:

- (i) Access – You may request access to your personal data to receive information, for example, about the categories of personal data that the Company is currently processing;
- (ii) Rectify – You may ask the Company to correct personal data that are inaccurate or incomplete;
- (iii) Erase – You may ask the Company to erase personal data where one of the following grounds applies:
 - a. Where the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - b. You withdraw consent* on which the processing is based and where there is no other legal ground for the processing;
 - c. You object to automated decision-making and there are no overriding legitimate grounds for the processing;
 - d. The personal data have been unlawfully processed;
 - e. The personal data have to be erased for compliance with legal obligation in Union or Member State law to which the Company is subject;
 - f. The personal data have been collected in relation to the offer of information society services.
- (iv) Restrict – You may ask the Company to restrict how it processes your personal data, requesting only their storage, where one of the following applies:
 - a. You contest the accuracy of your personal data, for a period enabling the Company to verify the accuracy of your personal data;
 - b. The processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
 - c. The Company no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims;



- d. You have objected to processing pursuant to the right to object and automated decision-making, pending the verification whether the legitimate grounds for the Company override those of you.

(v) Portability – You may ask the Company to transfer the personal data you have provided us to another organisation and / or ask to receive your personal data in a structured, commonly used and machine readable format.

In case you provided your consent to the processing of personal data, you may withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. If your personal data are transferred outside the European Economic Area, you have the right to obtain copy of such data as well as indication of the Country/Countries where the data have been made available.

You can exercise your rights by contacting our Data Protection Officer at the contact details above indicated. The request of exercise of rights is free of charge, unless the request is manifestly unfounded or excessive.

8. Your right to object to the processing of your personal

In case the processing of your personal data is based on the Company's legitimate interest, you have the right to object to the processing of your personal data and request the stop of the processing operations.

9. Your right to lodge a complaint to the Supervisory

In case you consider that the processing of your personal data infringes the applicable privacy laws, you have the right to lodge a complaint to the Italian Personal Data Protection Authority – Garante per la Protezione dei Dati Personali* with the modalities indicated on the Authority's website (www.garanteprivacy.it).

10. How long we retain your personal data

Your personal data can be retained for different period of times, depending on the purposes of the processing, in compliance with the applicable privacy laws.

In particular, for contractual purposes, your personal data will be retained for the whole duration of the contractual relationship and, in compliance with applicable laws, for a period of 10 years from the termination of the agreement or, in case of disputes, for the statute of limitations set forth under the applicable laws, without prejudice to longer storage periods provided for by specific laws.

Changes and updates of the privacy notice

Also considering possible amendments of the applicable privacy laws, the Company may integrate and/or update, wholly or partially, this privacy notice. Any changes, integrations or updates will be communicated in compliance with applicable laws also through publication ONE Procurement Tool.