PRIVACY NOTICE

for website users, clients, prospective clients, consumers, suppliers and business contacts

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

Controller	Studio Marco Piva S.r.l.
Privacy contact	privacy@studiomarcopiva.com

1. Scope

This Privacy Notice describes the processing of personal data carried out by Studio Marco Piva S.r.l. (also referred to below as the "Company" or the "Controller") in connection with the website www.studiomarcopiva.com, business and professional contacts, pre-contractual activities, client relationships and project management.

This Privacy Notice applies, in particular, to:

- website visitors and persons who contact the Company by e-mail, telephone or social media channels;
- individual clients, consumers and sole professionals;
- representatives, employees, collaborators and consultants of corporate clients or prospective corporate clients;
- prospective clients and contacts acquired at trade fairs, exhibitions, events or preliminary meetings;
- consultants, partners, suppliers and other persons involved in the Company's projects.
- individual suppliers and representatives, employees, collaborators or consultants of suppliers that are companies or other organisations.

2. Data Controller and contact details

The Data Controller is Studio Marco Piva S.r.l., with registered office at Via Achille Maiocchi, 9 - 20129 Milan (MI), Italy, represented by its legal representative pro tempore.

For requests concerning personal data protection, please write to: privacy@studiomarcopiva.com

The Company has not appointed a Data Protection Officer (DPO). Requests may be sent directly to the Controller using the contact details set out above.

3. Categories of personal data processed

In connection with the activities described, the following categories of data may be processed:

- identification and contact data: first name, surname, address, telephone numbers, e-mail address and, where necessary, date and place of birth;
- professional and organisational data: company or organisation, role, function, job title, area of activity and data included in e-mail signatures or business cards;
- pre-contractual, contractual and project data: enquiries, quotations, engagements, correspondence, project requirements, deliverables, documents and information necessary for the services;
- administrative, tax, accounting and payment data, to the extent necessary to manage the relationship and comply with legal obligations;
- the contents of communications and documents sent to the Company, including any data relating to third parties;
- data relating to marketing preferences, the giving or withdrawal of consent, objections and, where enabled, interactions with e-mail communications (e.g. message openings, clicks on links, date and time of the interaction);
- technical and browsing data: IP address, logs, device identifiers, browser information and data concerning use of the website;
- images, photographs, graphic materials and other project materials, where necessary for the requested services.

As a rule, the Company does not request special categories of personal data under Article 9 GDPR or personal data relating to criminal convictions and offences under Article 10 GDPR. If such data are incidentally included in documents or communications received, they will be processed only where relevant and necessary and where an appropriate legal basis applies. Data subjects are requested not to provide excessive or unnecessary data.

4. Sources of personal data

Personal data may be collected:

- directly from the data subject, through e-mail, telephone calls, meetings, contracts, events or other communications;
- from the client, prospective client, employer or organisation to which the data subject belongs;
- from consultants, partners, suppliers, other project participants or counterparties involved in the activities;

- from registers, professional directories, institutional websites or other publicly accessible sources, where relevant and lawful;
- from social media platforms, where the data subject contacts the Company or interacts with its profiles.
- automatically, through tracking pixels, tracked links or similar technologies embedded in e-mail communications, where such functions are enabled on the basis of consent.

Where personal data are not obtained directly from the data subject, this Privacy Notice is provided within the time limits set out in Article 14 GDPR, unless one of the exceptions under that Article applies.

5. Purposes, legal bases, provision of data and retention

The following table summarises the main purposes of processing. As a rule, the periods indicated run from completion of the relevant activity or the last relevant contact and may be extended where necessary to comply with legal obligations or establish, exercise or defend legal claims.

Purpose	Processing	Legal basis	Provision of data	Retention
Website browsing and security	Delivery of web pages, technical operation, prevention of abuse, network and system security, and log management.	Article 6(1)(f) GDPR: legitimate interest in website security and functionality. For non-essential cookies: consent, where required.	Technical data are generated automatically. Optional cookies may be refused.	logs and technical data; cookies as set out in the Cookie Policy.
Enquiries and pre-contractual activities	Responding to requests for information, appointments, quotations and pre-contractual measures.	Article 6(1)(b) GDPR for requests made by the data subject; Article 6(1)(f) for contacts relating to companies or organisations.	Necessary to respond to the request.	up to 24 months from the last contact, unless a relationship is established.
Contracts and project management	Performance of the engagement, communications, coordination, management of contacts and preparation of deliverables.	Article 6(1)(b) GDPR for individual clients; Article 6(1)(f) for contact persons, consultants and third parties involved.	Necessary to establish and manage the relationship.	For the duration of the relationship; relevant documentation may be retained for up to 10 years or for any different applicable period.
Management of suppliers, consultants and partners	Selection and management of suppliers, consultants and partners; requests for quotations, orders, engagements, contracts, operational communications and management of the relevant contact persons.	Article 6(1)(b) GDPR for suppliers who are natural persons; Article 6(1)(f) GDPR for contact persons of companies or organisations; Article 6(1)(c) GDPR where processing is necessary to comply with legal obligations.	Necessary to assess, establish and manage the supply or professional relationship; failure to provide the data may prevent the relationship from being managed.	For the duration of the relationship; contractual, administrative and accounting documentation may be retained for up to 10 years or for any different applicable period.
Administrative and legal obligations	Invoicing, accounting, tax and corporate obligations, and requests from authorities.	Article 6(1)(c) GDPR.	Mandatory where required by law.	For the periods required by law, generally 10 years for accounting records.
Establishment, exercise or defence of legal claims	Management of disputes, debt recovery, prevention and defence in out-of-court or court proceedings.	Article 6(1)(f) GDPR; Article 9(2)(f) GDPR, where applicable.	Failure to provide the data may prevent the protection of the relevant legal position.	For the time necessary to manage the claim and for the applicable limitation periods.
Contacts from trade fairs, exhibitions and events	Individual responses and follow-up consistent with the context of the meeting or the request made.	Article 6(1)(f) GDPR; Article 6(1)(b) where requested pre-contractual measures are involved.	Optional; failure to provide the data prevents further contact.	up to 12 months from the last contact, unless a subsequent relationship is established.
Marketing by e-mail	Sending communications concerning the Company's services, projects, events and initiatives.	Article 6(1)(a) GDPR and Article 130 of the Italian Privacy Code; Article 130(4) only where the soft-spam exception applies.	Optional. Refusal does not affect contracts or services.	Until withdrawal of consent or objection. The list is reviewed at least every 36 months to verify that a valid legal basis still exists and that the contact remains current; contacts that are no longer relevant or lack a valid basis are excluded from marketing, without

Purpose	Processing	Legal basis	Provision of data	Retention
				prejudice to retention for other lawful purposes. Evidence of consent, withdrawal and objection is retained as necessary to demonstrate compliance and manage claims.
Measurement of interactions with e-mail communications	Where enabled, measurement through tracking pixels, tracked links or similar technologies of message openings, links selected and other interactions attributable to the recipient.	Article 6(1)(a) GDPR and Section 122 of the Italian Privacy Code: the data subject's consent, except where an applicable statutory exemption applies.	Optional. Refusal to consent to tracking does not, where another valid legal basis exists, prevent receipt of marketing communications. Consent to tracking may be withdrawn separately.	Up to 12 months from each interaction; thereafter detailed data are erased or anonymised/aggregated. Evidence of consent and withdrawal is retained for evidentiary purposes.

6. Use of artificial intelligence systems

In the course of its professional and project activities, the Company may use generative artificial intelligence systems and other automated tools for ancillary and support activities, including:

- drafting, reviewing and translating drafts, e-mails and other texts;
- preliminary review, classification or summarisation of documents;
- generating or editing images, renderings and graphic materials for projects.

The use of these tools is not a separate purpose of processing: processing remains linked to the contractual, pre-contractual, organisational or project-related purposes described in this Privacy Notice. Relevant outputs are subject to human review and verification before use. The Company does not make decisions based solely on automated processing that produce legal effects concerning data subjects or similarly significantly affect them.

The tools are not used to make autonomous decisions concerning clients, project participants or personnel.

The Company uses only approved business accounts and does not use personal accounts for Company activities. Data entered into the systems are limited to what is relevant and necessary. Before use, the Company assesses the use case, account type, service terms and applicable safeguards. Depending on the service and contractual terms, providers may act as processors under Article 28 GDPR or as independent controllers for specific processing activities of their own.

7. Cookies and other tracking technologies

The website may use technical cookies that are necessary for its operation and, subject to consent where required, non-essential cookies or other tracking technologies. Information on types, purposes, duration, providers and preference management is set out in the Cookie Policy available at: https://www.studiomarcopiva.com/cookie-policy-eng/

Closing the banner or continuing to browse does not, in itself, constitute consent to non-essential cookies. Users must be able to refuse or change their preferences through accessible means.

8. Recipients and persons processing personal data

Personal data may be processed, within the limits of the respective functions, by:

- directors, employees and collaborators authorised and instructed by the Company;
- providers of IT, hosting, e-mail, cloud, storage, security and technical support services, as well as platforms used to send newsletters and, where enabled, to measure related interactions;
- providers of generative artificial intelligence, document processing and image generation or editing services;
- professional advisers, insurers, financial institutions and providers of administrative or legal services;
- partners, consultants, suppliers and project participants, where disclosure is necessary for the services;
- public authorities, judicial bodies or other persons to whom disclosure is required by law or by order of an authority.

Depending on the circumstances, external parties act as processors under Article 28 GDPR or as independent controllers. An up-to-date list of processors is available on request from privacy@studiomarcopiva.com. Personal data

are not made publicly available unless this is expressly required or authorised for specific project purposes and supported by an appropriate legal basis.

9. Transfers to countries outside the EEA

The use of cloud, e-mail, artificial intelligence and other IT services may involve the processing of personal data in countries outside the European Economic Area.

Where a transfer takes place, the Company relies on one of the mechanisms provided for in Articles 44-49 GDPR, such as an adequacy decision of the European Commission, Standard Contractual Clauses and, where necessary, supplementary measures. Information on the applicable safeguards may be requested from the Controller.

10. Processing methods and security

Processing is carried out using paper, electronic and telematic means in accordance with the principles of lawfulness, fairness, transparency, data minimisation and storage limitation. The Company adopts technical and organisational measures appropriate to the risk to protect the confidentiality, integrity, availability and resilience of personal data, including, where appropriate, access controls, authentication, authorisation management, backups, updates, event logging and encryption.

The measures are reviewed in light of changes in risks, services and technologies used.

11. Nature of the provision of data

Providing data identified as necessary or required by law is essential to respond to enquiries, establish or perform the relationship and comply with applicable obligations. Failure to provide such data may prevent the Company from responding to the enquiry or providing the service.

Providing data for marketing purposes is optional, and refusal has no effect on the contractual relationship or the services requested. Consent to any tracking of interactions with e-mail communications is also optional and may be withdrawn separately.

12. Data subjects' rights

In the cases and within the limits provided for by the GDPR, data subjects may exercise the following rights:

- access to personal data and information on the processing (Article 15);
- rectification of inaccurate data and completion of incomplete data (Article 16);
- erasure of personal data where the relevant conditions are met (Article 17);
- restriction of processing (Article 18);
- data portability, where applicable (Article 20);
- objection to processing based on legitimate interests (Article 21);
- withdrawal of consent at any time, without affecting the lawfulness of processing carried out before withdrawal (Article 7);
- not to be subject to a decision based solely on automated processing in the cases provided for by Article 22.
- to object to marketing: Data subjects may object at any time to processing for direct marketing purposes. If they object, their data will no longer be processed for those purposes. Consent to any tracking of interactions with e-mail communications may be withdrawn separately. Withdrawal or objection may be communicated to privacy@studiomarcopiva.com or, where available, through the unsubscribe link or preference centre included in the communications.

The Company responds to requests without undue delay and, as a rule, within one month. The period may be extended by a further two months in the cases provided for by Article 12 GDPR, and the data subject will be informed of the reasons for the extension.

Data subjects may also lodge a complaint with the Garante per la protezione dei dati personali (the Italian Data Protection Authority), Piazza Venezia, 11 - 00187 Rome, Italy, or use the channels indicated on the Authority's official website.

13. Automated processing and profiling

In connection with the processing described, the Company does not make decisions based solely on automated processing that produce legal effects concerning the data subject or similarly significantly affect them. Artificial intelligence tools are used for support, and their outputs are subject to human review.

14. Updates to this Privacy Notice

The Company may update this Privacy Notice in the event of legal, organisational or technological changes. The current version is identified by its update date and published on the website. Data subjects will be informed of material changes through means appropriate to the relationship and context.