



Your Concierge

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www.yourconciergerome.com

INFORMATION ON THE PROCESSING OF PERSONAL DATA

pursuant to Article 13 of EU Regulation 2016/679 and Legislative Decree No. 196 of 2003, as amended by Legislative Decree No. 101 of 2018

Your Concierge is committed every day to ensuring the protection of its Customers' personal data, processing it lawfully, fairly and transparently, in accordance with the General Data Protection Regulation 2016/679 (hereinafter, "**GDPR**" or "**Regulation**") applicable from 25 May 2018 in every Member State of the European Union, as well as the provisions of Legislative Decree No. 196 of 2003, as amended by Legislative Decree No. 101 of 2018.

• **Who is the Data Controller of your personal data?**

Your Concierge S.r.l. (hereinafter also referred to as "**Your Concierge**"), with its registered office in Rome, Piazza Albania no. 35 (Tax Code and VAT No. 18435641008), in the person of its current legal representative, is the Data Controller of your personal data (hereinafter also referred to as the "Data Controller" or "we").

• **What is meant by personal data, and what data do we process?**

"**Personal data**" means any information capable of identifying, directly or indirectly, a natural person, in this case, the Customer (the "**Data Subject**"). Your Concierge collects and processes the Customer's personal data, and where applicable also that of their family members, strictly necessary for the provision of the requested Services and, in particular:

(a) personal details, identification and financial data, namely first name, surname, date and place of birth, tax reference number, gender, residential address, telephone number, email address (if applicable) and, in general, any other data and information necessary for the conclusion and performance of the contract (for example, bank account details, credit card details, etc.);

(b) "special categories of personal data", namely personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health, sex life or sexual orientation (for example, a dietary restriction from which a health condition or religious beliefs may be inferred, etc.).

• **Why do we process your personal data?**

Your Concierge uses the information provided by the Customer exclusively for the specific purposes for which it was provided, as stated at the time of collection and as permitted by law. The information collected may be used for the following purposes:

(a) to perform the Service and fulfil contractual obligations;

(b) to process and record transactions and to respond to your enquiries;



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(c) for legal defence or in the preparatory stages leading to potential litigation, in the event of a dispute.

Therefore, the legal basis justifying the relevant processing is the performance of the requested Service (Article 6(1)(b) of the GDPR) and/or the legitimate interest of the Data Controller (Article 6(1)(f) of the GDPR).

The provision of personal data for the purposes referred to in point 11.4 is necessary for the performance of a contract to which the Customer is a party or for the implementation of pre-contractual measures taken at the Customer's request; failure to provide such data will make it impossible to perform the contract and to provide the Service.

- **How do we collect and process your personal data?**

Data processing takes place at the Data Controller's premises, exclusively by technical staff authorised and trained for this purpose, or by any persons appointed to carry out occasional maintenance operations. The data is transferred to the Partners who will provide the Service, who may use it exclusively for the performance of the Service itself. No data arising from the provision of the Service is disclosed externally.

- **Where do we transfer your data?**

As a rule, we do not transfer data outside the European Union. However, should personal data need to be transferred to countries outside the European Economic Area (EEA), in the absence of adequacy decisions by the European Commission, the Data Controller will ensure appropriate safeguards are in place to protect personal data in those countries. Where IT and security services are used, provided by US companies (acting as Data Processors pursuant to Article 28 of the GDPR), the Data Controller undertakes to select, where possible, services provided via European data centres and to periodically verify (at least annually) the certification of such companies under the EU-US Data Privacy Framework.

- **How long and where do we store your personal data?**

The Data Controller retains the Customer's data only for the time necessary to carry out the processing for the purposes mentioned in point 11.4. In particular, Your Concierge will process the data for the entire duration of the contract and for as long as obligations or requirements related to the performance of the contract remain. Following the termination of the contractual relationship, the Data Controller will process and retain the Customer's personal data – including to comply with legal and regulatory obligations, as well as for the purposes of defending its own or third parties' interests – until the expiry of the retention period applicable by law in each case.



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In any event, personal data will be stored either on suitable electronic media kept in a dedicated server room or at the administrative office, and where necessary also on paper in secure files, stored in suitable locked fireproof cabinets to which access is restricted to persons authorised by the Data Controller.

- **What are your rights as a data subject?**

Pursuant to Articles 15, 16, 17, 18, 19, 20, 21, 22, and 77 of the GDPR, you may, at any time, exercise the following rights vis-à-vis the Data Controller:

- (a) right of access: the right to obtain confirmation as to whether or not your data is being processed, as well as the right to receive all information relating to such processing;
- (b) right to rectification: the right to have your data rectified if it is incomplete or inaccurate;
- (c) right to erasure (so-called “right to be forgotten”): in certain circumstances provided for by the GDPR, you have the right to obtain the erasure of your data held in our records where it is not relevant for the purposes of continuing the contractual relationship or necessary to comply with a legal obligation;
- (d) right to restriction of processing: where certain conditions apply, you have the right to obtain restriction of processing, provided that the data is not relevant for the purposes of continuing the contractual relationship or necessary to comply with a legal obligation;
- (e) right to data portability: the right to have your data transferred to another data controller;
- (f) right to withdraw consent: the right to withdraw consent to the processing of data, if given, without prejudice to the lawfulness of processing based on consent before withdrawal and without prejudice to the consequent and inevitable termination of the contractual relationship;
- (g) right to lodge a complaint with the Data Protection Authority: you have the right to submit requests to exercise your rights at any time.

The above rights may be exercised vis-à-vis Your Concierge by writing to the email address: *ask@yourconciierge.com.

The exercise of your rights as a data subject is free of charge pursuant to Article 12 of the GDPR.



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- **Changes to this information**

The Data Controller reserves the right to amend and/or update this information, including in response to legislative changes, or to recommendations, general authorisations, guidelines, or further safeguards indicated by the Italian or European Data Protection Authority, but always to provide greater protection for the processing of your personal data. However, such changes will only take effect after we have informed you via a notice on our website or, if this is not technically possible, by sending you written notification to one of the contact details held by Your Concierge.

Where the changes relate to processing operations for which the legal basis is consent, the Data Controller will seek your consent, where necessary.

Rome, 16 April 2026