

Privacy Notice for Clients

Article 13, Data Protection Regulation 2016/679 - GDPR

Effective Date: 24/01/2024

Version n.: 1.0

Data Controller

Pursuant to Article 13 of the EU Regulation 2016/679 (*GDPR*), **ISS Global Forwarding One Person Company LLC** (hereinafter "**ISS**", or "**Company**", or "**Data Controller**"), processes personal data from clients disclosed at the time of establishment, management and execution of business relationships on a contractual basis with ISS.

Purposes and legal basis

The collected personal data are used for the sole purpose of:

- a) establishment, management and execution of business relationships on a contractual basis;
- b) taking legal action before the competent authorities if a dispute arise.

Personal data are collected and processed insofar as they are necessary for the performance of pre-contractual and contractual measures taken in order to establish a business relationship with clients (Art. 6 par. 1, lect. b, GDPR).

Personal data

The personal data processed for the aforementioned purposes are:

1. identity and contact information of clients' personnel (name, surname, qualification, phone number and email address, society).

Data retention period

The Data Controller processes personal data as long as necessary to fulfill the purposes set forth in previous paragraphs; in particular, the retention period has been set to 10 years following the successful conclusion of the contractual/commercial relationship.

Means of the processing

Data processing is performed through paper media by persons specially appointed for the purpose highlighted above and committed to confidentiality.

Data communication

The Company can eventually transmit some of clients' personal data, according to a strict criterion of relevance, to the following categories of subjects:

- **Companies in the ISS group** for administrative-accounting purposes;
- **third-party companies** that perform outsourced activities on behalf of the Data Controller.

Where ISS entrusts the processing of personal data to a supplier or agent on its behalf, it will verify, monitor, and ensure that the information is properly protected and that appropriate contractual arrangements are in place between the parties to ensure personal data protection and confidentiality. Besides what has been previously stated, clients' personal data will not be communicated or disseminated to unspecified third parties.

Nature of data provision

The provision of personal data is necessary and, without, it will not be possible to establish any business relationship.

Data transfer

Clients' personal data could be transmitted abroad, in particular towards Europe, where other ISS' Group Societies have their legal offices.

In that event of transfer of personal data abroad towards Europe or other third countries, the Company undertakes to assess the risk of interference and/or access to personal data by Public Authorities of third countries by taking appropriate measures to ensure that the data is adequately protected at the destination, verifying that the entities importing the data are subject to an adequacy decision adopted by the European Commission, or by signing with them, including through data processors on behalf of ISS, standard contractual clauses, approved by the European Commission, possibly supplemented by additional technical, organizational or contractual measures where necessary.

In the case of transfers to companies in the ISS group, the Company will ensure that these latter have adopted security measures in line with European standards, as mechanisms assessing the risk arising from the data transfer, aimed at identifying appropriate technical, organizational and contractual measures to support the transfer itself, which ensure the highest standards of personal data protection.

Exercise of data subject's rights

Any Client may, at any time, exercise the rights set forth below.

1. **Access to personal data:** to obtain confirmation that data are being processed and, if so, access to the following information: the purposes, the categories of data, the recipients, the retention period, the right to lodge a complaint with a Supervisory Authority, the right to request rectification or erasure or restriction of processing or opposition to the processing itself as well as the existence of an automated decision-making process;
2. **Request for rectification or erasure ("right to be forgotten"):** a data subject can request that the records containing his/her personal data, that ISS holds about him/her, are rectified if incorrect or deleted without undue delay in predetermined circumstances provided for in Art. 17 GDPR;
3. **Restriction of Processing:** data subjects' rights to obtain from the Data Controller a restriction to the use of personal data concerning them under specific circumstances detailed in Art. 18 GDPR;
4. **Objection to processing:** to object on grounds related to personal data processing based on legitimate interest of ISS or automated decision making or profiling;
5. **Data Portability:** in the case of automated processing realized on the basis of consent or performing a contract, to receive in a structured, commonly used and machine-readable format the data concerning clients' personnel;
6. **Withdrawal of consent:** to the processing for the above-mentioned purposes; the exercise of this right does not affect in any way the lawfulness of the processing carried out before the withdrawal;
7. **Lodge a complaint:** under Article 77 GDPR with the Competent Supervisory Authority; for Italy, the competent authority is the *Garante Per La Protezione Dei Dati Personali*, which can be contacted through the contact details provided in the following website <http://www.garanteprivacy.it>.

Requests relating to the exercise of the data subjects' rights will be processed within one month from the initial request; in cases of particular complexity and relevant number of requests this term may be extended by further 2 (two) months.

Points of contact for data subjects

Data subjects, for matters concerning the processing of personal data, can contact the Company at the following email address: privacy@iss-gf.com.

Changes and updates

This Privacy Notice is effective from the date indicated in its header. The Company may also make changes and/or additions to this Notice, including as a consequence of any subsequent changes in the relevant applicable regulations.