

## 1. Purpose

With this privacy policy BCL Partners Law Firm (hereafter “The Firm” or “BCL Partners”) intends to describe how the website is managed, with specific regard to the collection of website users’ personal data, as well as registration and utilization, and the purposes of such processing. This notice refers only to *www.bclpartners.com* and *www.bclpartners.it* (hereafter “The Website”) and is not meant to be applied to other websites reachable through the links on the pages of the aforementioned websites.

The website is managed and controlled by BCL Partners, with their registered office in Milan, via Circo n. 12, who are responsible for the treatment of data.

This privacy policy is addressed to the visitors and users of The Website and intends to satisfy the requirements provided by the article 13 of Legislative Decree n. 196/2003, also considering the Recommendation n. 2/2001 adopted on 17<sup>th</sup> May 2001 by the European Authorities for personal data protection to identify some basic requirements for the online collection of personal data.

## 2. Place of data processing

The Website is hosted on servers run by an external company, Servicematica s.r.l. However, data processing is managed by BCL Partners in Padua’s branch.

## 3. Treatment responsible

Avv. Francesco Barotti is responsible for data gathered and treated through The Website, while the Firm is the rights holder of this treatment.

## 4. Type of data processed

### a. Navigation data

The IT systems and software procedures for the operation of this website, while in normal use, collect some personal data whose transmission is implicit while using the Internet communication protocols. The above information is not collected in association with any identified person, but its nature could make it possible to identify users by means of special processing and associations with other data. The IP addresses or the domain names through which the users connect to the website, the URI addresses of the resources requested, the time of the request, the procedures used to submit the request to server, the file size of the reply, the numeric code indicating server’s reply and other parameters relating to user’s operating system or IT environment fall within this category of data.

### b. Data provided by the user

The optional, explicit and voluntary sending of users’ CVs through the relevant form in the “Employment” section of The Website entails the collection of senders’ addresses, which are necessary to reply to applications, as well as other personal data which may be included in the message if the user gave authorization for the collection and treatment of data. The users that wish to send their CVs through The Website are invited to observe this notice, with regard to the processing of their data included in their CVs, along with the notice given in the “Employment” section of The Website. BCL Partners specifically reminds users that the Privacy Code prescribes that sensitive data (such as personal data allowing the disclosure of racial or

ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical or political nature, as well as personal data disclosing health and sex life) can be processed only with previous written consent. This is not comparable to the consent given by the user in the “Employment” section of The Website. Thus, as sensitive data is not necessary in order to evaluate users’ candidacy for employment, The Firm advises users applying to the firm not to include any sensitive data in their CVs.

#### 5. Purposes of data processing and communication

Navigation data is solely used to obtain anonymous statistical information about the use of the website and to verify its proper operation, and will thus be deleted immediately after processing. The data may be used to ascertain any liability in the case of possible IT-related hacks to the website by the ISPs, who may be obliged to collect their users’ data. Personal data provided by users sending their CVs applying to the Firm will be only used to reply the request, as stated in the “Employment” section of The Website.

#### 6. Cookies

Cookies are pieces of information temporarily memorized on users’ computers during website navigation and are used to process and acquire data on website use. Any personal data is memorized by The Website. The Website does not use cookies for the transmission of personal data, nor are resident cookies used for any reason, including the tracking of users. The so called session cookies (that are only temporarily recorded on user’s computer and that are deleted as soon as the browser is closed) are strictly limited to the transmission of session IDs (made up of random numbers generated by the server) necessary for the safe and efficient exploration of The Website. Session cookies used in this website do not result in potential threats to users’ privacy and do not allow for the recording of personal data.

#### 7. Processing

Personal data is processed with IT tools only for as long as is necessary for the purposes for which it has been collected. Specific security measures have been adopted to prevent any loss of data, any unlawful or non correct use of the same and unauthorized access.

#### 8. Users’ rights

The subjects of the data are entitled at any time to have confirmation of the existence of such data and to be acquainted with its contents, to verify its source and accuracy and to require its integration, updating or correction (art. 7 Privacy Code). In compliance with art. 7 Privacy Code, any subject is entitled to request that their data is deleted, made anonymous or blocked, as well to object to its processing.

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This document constitutes the Privacy Policy of The Website. In the eventuality of the creation of new laws, or as a consequence of new services offered to clients, this policy may be subject to modifications. We thus invite our users to refer back to this Policy periodically.