



PRIVACY POLICY for REAL ESTATE PURCHASE/SALE/LEASE & CONSULTATION

Dear Mr. _____

Dear Ms _____

Subject: Privacy policy pursuant to art.13 of Legislative Decree No.196 of 30 June 2003 and art. 13 of Regulation EU 579/2016 (GDPR) on the protection of personal data.

Pursuant to and in accordance with the said regulation, my Estate Agency hereby wishes to inform you in advance with regard to the use of your personal data and of your rights as follows:

1. CONTROLLER AND DATA

The data controller is Thomas Bertil Wallin, with registered office at Via Lungomare 171, Arma di Taggia. An updated list of data processors, with their relative areas of competence, may be consulted directly in the office or on the website.

2. PERSONAL DATA SUBJECT TO PROCESSING

For the purposes of expediting the work of real estate brokerage and to meet your request for services, we use some of the interested party's data. This includes identity data, contact information (addresses, land line telephone and mobile telephone numbers, fax number and email addresses), data regarding the property, data regarding your financial standing, land registry certificates and deed of origin of the property. Data regarding composition of your household.

3. PURPOSE, LEGAL BASIS AND COMPULSORY OR OPTIONAL NATURE OF PROCESSING

Such data shall be provided by the interested party and shall be collected by our staff and our associates, also by electronic or telematic means, to enable us to expedite the work of real estate brokerage, carry out a service or a contractually agreed operation, check the progress of contractual relations, as well as the risks connected therewith. It is specified that the provision of such data is compulsory in the sense that otherwise we will not be able to partially or completely fulfil the abovementioned assignment, and that your data may also be collected from third parties. Moreover, some information may legally be required to be provided by you or by third parties (for example, in accordance with anti-money laundering legislation).

Your identity data will also be processed for the discharge of obligation deriving from State laws, EU regulations and legislation, or from provisions issued by authorities legally entitled to do so and by control or supervisory bodies. The relative processing does not require the consent of the interested party.

Information regarding your property, including photos of same, shall also be the subject of processing to enable advertising and commercial procedures aimed at the proper fulfilment of the assignment given and may, therefore, be the subject of dissemination by publication on websites, social networks and/or the controller's printed publications, following your express consent. Your email address may be used by the controller to send you notices on products and services similar to those provided, pursuant to and in accordance with paragraph 4 of Art. 130 D. Lgs. 196/2003. –You are entitled to oppose processing for such purpose at any time. Opposition will have no effect on the pursuit of the main purpose of providing real estate brokerage services.

4. RECIPIENTS

Your data will be made known to our internal administrative staff and to our external associates, a list of whom is available at our offices, and shall also be communicated to our service providers, such as IT services companies, outsourcing companies, consultants and freelance professionals, insurance companies, debt collecting agencies, fraud prevention companies, bodies and/or aid societies, companies or bodies nominated by us as responsible for specific processing, a list of which is at your disposal at our offices.

Furthermore, your data may be communicated to third parties to enable all verifications regarding the property of interest to you to be carried out at the Land Registry Office and/or other Institutions, Bodies or Registers.

5. TRANSFERS

Some of your personal data may be transferred to Recipients which may be located outside the European Economic Area. The Data Controller guarantees that processing in electronic or paper form of your personal data by the Recipients is carried out in compliance with the applicable laws. In truth, transfers are based either on an adequacy decision or on the Standard Model Clauses approved by the European Commission. Further information and a copy of these agreements are available from the Data Controller.

6. DATA RETENTION

All personal data provided shall be processed in compliance with the principles of lawfulness, correctness, pertinence and proportionality, only by the methods, including electronic and telematic, strictly necessary for the purposes described above. In any event, personal data shall be retained for a period of time no longer than that strictly necessary to achieve the ends indicated. Personal data which is not necessary to retain in relation to the purposes indicated shall be erased or transformed into anonymous form. It is emphasized that the computer systems used to manage the information collected are already configured to minimize use of the data.

7. YOUR RIGHTS

Finally, we would remind you that as the interested party, you have the rights referred to in art. 7 of the Personal Data Protection Code and art. 15 GDPR, and more precisely the right to:

- i. obtain confirmation of the existence or otherwise of personal data that concerns you, regardless of whether it has been recorded, and its communication in intelligible form;
- ii. obtain information on: a) the origin of the personal data; b) the purpose and method of processing; c) the logic applied in the event of processing with the aid of electronic instruments; d) details concerning the identity of the data controller, data processors and appointed representative pursuant to art. 5, paragraph 2 of the Personal Data Protection

Code and art.3, paragraph1, GDPR; e) recipients or types of recipients to whom the personal data has been or may be disclosed or who may become aware of the data in their capacity as nominated country representative, data processors or persons in charge of the processing;

- iii. have: a) the data updated, corrected, or where it is in your interest, supplemented; b) any data that has been unlawfully processed, including data for which retention is unnecessary for the purposes for which they were collected and subsequently processed, erased, made anonymous or blocked; c) certification to show that any third parties to whom personal data has been communicated have been informed of the operations mentioned in paragraphs a) and b), except where this proves to be impossible, or where doing so would entail a disproportionate effort in relation to the right that is to be protected.
- iv. object, wholly or in part: a) on legitimate grounds, to the processing of personal data, even though it is relevant to the purpose of the collection; b) to the processing of personal data, where this is carried out for the purpose of sending advertising materials or of direct selling, or else for the performance of market research or commercial communication surveys by means of automated call systems without the intervention of an operator, e-mail and/or by traditional telephone and/or paper mail marketing methods. Where applicable, you also have the rights referred to in arts. 16-21 GDPR (right of correction, right to be forgotten, right to restriction of processing, right to data portability, right of opposition), as well as the right to complain to the Supervisory Authority.

To exercise the rights referred to above, you may contact our Data Controller appointed to provide feedback, Thomas Bertil Wallin, by the following means: thomas@ibiscase.com, +39 (0)184-478237 or +39 338-9885542