

## **PRIVACY POLICY OF CFA ITALIA SRL AND CFA SOCIETY ITALY PURSUANT TO ART. 13 AND 14 EUROPEAN REGULATION 679/2016 (G.D.P.R.)**

### **Data subjects: members, followers, registered participants to “open to the public” events/training courses/challenges**

Provided that CFA Italia Srl and CFA Society Italy are joint controllers pursuant to a co-ownership agreement signed on 13/7/2022, with the common purpose of carrying out the objectives stated in CFA Italia Srl and CFA Society Italy and CFA Institute bylaws.

CFA Italia Srl and CFA Society Italy, depending on your type of membership, may receive your personal data from CFA Institute, located at 915 East High Street, Charlottesville, VA, 22902, as clarified and specified in the terms and conditions of use, as well as in the privacy policy published on CFA Institute website <https://www.cfainstitute.org>, which is why this notice is provided both pursuant to art. 13 Eur. Reg. 679/2016, in the case it is you who provide your data, and in accordance with art. 14 Eur. Reg. 679/2016, in the case your data are received by us, for territorial reasons, through your registration with CFA Institute.

This information is also valid for persons who are not yet members in any capacity, but who want to attend events and/or training courses and/or challenges “open to the public” organised by CFA Italia Srl and CFA Society Italy - also through the collaboration and sponsorship of third parties - and who can register through the website [www.cfasi.it](http://www.cfasi.it).

Having this said, we inform you that the European Regulation 27/4/2016 No. 679 lays down rules relating to the protection of natural persons and other subjects with regard to the processing of personal data, according to the principles and rules set out below.

Pursuant to the aforementioned legislation, your personal data will be processed in accordance with the principles of fairness, lawfulness and transparency, necessity, proportionality, and minimisation of data to protect your confidentiality and your rights, with the specification that we collect the personal data which are strictly necessary for the purposes indicated below.

Pursuant to applicable national and European legislation, we therefore provide the following information.

### **1. Legal basis of processing, purpose, and method of data processing**

The undersigned hereby informs you that, according to the relationship between CFA Italia Srl and CFA Society Italy, the personal data concerning you or that have been communicated to us directly by you or by third parties, specifically by CFA Institute, are necessary pursuant to art. 6 of Eur. Reg. 679/2016 paragraph 1 in the cases which follow:

- letter b): when processing is necessary for the execution of a contract to which the data subject is party or for the implementation of pre-contractual measures taken at the data subject’s request;
- letter c): when processing is necessary for compliance with a legal obligation to which the controller is subject;
- letter f): when processing is necessary for the pursuit of the legitimate interests of the controller or of third parties.

Your personal data, which have been provided directly by you or which have been received from CFA Institute, for reasons of territorial operations, following your registration with CFA Institute, will be processed exclusively for purposes strictly connected and instrumental to the fulfilment of the obligations inherent to the relationship with our companies, CFA Italia Srl and CFA Society Italy, between which a co-ownership agreement has been stipulated in accordance with art. 26 GDPR, and, in particular, to what follows:

- 1) inclusion of personal data in the company’s databases, for the achievement of institutional and contractual purposes, as well as for the fulfilment of regulatory obligations imposed by current legislation (a copy of a valid identification document and tax code is required in order to become

- a member, for the purpose of the correct identification of members and the fulfilment of invoicing obligations);
- 2) book keeping;
  - 3) management of receipts and payments;
  - 4) fulfilment of the obligations provided by civil, tax and fiscal laws, regulations and EU legislation;
  - 5) fulfilment of contractual obligations, including but not limited to registration for an exam, an exam preparatory course, the issuance of certificates of attendance and passing examinations, participation in scholarships selections, responding to your request for information;
  - 6) taking advantage of the discounts and benefits provided for members (according to the type of membership), including the subscription to the magazine AdvisorPrivate, edited by Open Financial Communication Srl, to which your mailing address will be transferred for the accomplishment of the delivery of the printed copy;
  - 7) being part of CFA Italia Srl and CFA Society Italy network, which aims at creating professional and educational opportunities, etc;
  - 8) subscription to newsletters, participation to training courses, refresher courses, events, round tables, competitions on financial matters, surveys, and any events promoted, sponsored, carried out with the complete or partial collaboration of CFA Italia Srl and CFA Society Italy;
  - 9) free of charge publication of your image and profile, with no profit, on our social media, our website <https://www.cfasi.it>, on printed and digital booklets and brochures, subject to the acquisition of your consent, with the sole purpose of highlighting the value of your educational and professional achievements, and of communicating the values and mission of CFA Society Italy and CFA Italia Srl;
  - 10) participation to events and training courses that are open to the public and not exclusive for members, for organisational reasons.

The processing of personal data shall be carried out through paper and computer devices by the joint controllers, the people in charge and the authorised individuals/third parties appointed for this purpose, in compliance with all precautionary safeguards to ensure security and confidentiality and in compliance with technical and organisational procedures to ensure a level of security which is appropriate to risk.

## **2. Nature of data collection, consequences of failure to provide data, duration of processing**

The provision of your personal data, with the exception of the purposes set out in art. 1, points 6, 7, 8 and 9, is compulsory in order to fulfil the obligations arising from the contract and, in general, from legal obligations.

Failure to provide them may make it impossible for us to fulfil our contractual obligations.

From the time of termination of the processing for the purposes set out in art. 1, points from 1 to 6, and 10, your data will be retained in compliance with legal obligations for 10 years; for the purposes set out in art. 1 points 7, 8, 9, the data acquired for the purposes specifically set out therein will be erased or/and removed in a timely manner, subject to the time and technical issues involved.

## **3. Disclosure and dissemination of data – Transfer of personal data to non-EU Countries**

Your personal data, for the purpose of the execution of the contract and for the above-mentioned purposes, may be disclosed:

- to all individuals and legal entities (institutions, associations, legal, administrative, tax advisory companies, auditing companies, data processing providers, etc.), marketing and web-marketing companies, event management companies, universities, university and training programme partners, speakers and professors, affiliated companies, sponsors and partners of events organised and promoted by CFA Institute, CFA Italia Srl and CFA Society Italy,
- to exam preparatory providers and related service providers, and to other professionals in the case specified at art. 1, point 7;
- to financial services, for the processing of receipts and payments;
- to collaborators/partners and employees of CFA Italia Srl. and CFA Society Italy specifically appointed and within the scope of their duties, who have been appointed to process the data;

- to Open Financial Communication Srl, for the delivery of the printed copy of their publications, if you are entitled to receive them.

### **Registration to open-to-the-public events/trainings for non-members.**

In case you are not a member of CFA Society Italy and intend to register for an open to the public event and/or a training course, please note that in the case the event is sponsored or in partnership with a third party, CFA Society Italy and CFA Italia Srl may provide sponsors and partners with a list of participants which may include name, title, organisation and email address of attendees for the sole purpose of the organization of the event.

Sponsors/partners will be appointed external controllers pursuant to Art. 28 European Regulation 679/2016.

In this case, partners and sponsors commit themselves to:

- contact the attendee for purposes related to the event/training only;
- not to share your personal data with third parties;
- to comply with the current laws and regulations on privacy, data protection and security.

If you do not wish your information to be shared with sponsors and partners, please do not register to the event/training. Alternatively, you may ask to register to the event/training writing to [privacy@cfasi.it](mailto:privacy@cfasi.it) expressing your interest to participate, your consent to the use of personal data for organisational reasons only, and your request that your personal data are not shared with sponsors/partners.

### **Transfers of personal data to non-EU Countries.**

If the transfer of data for the aforementioned purposes takes place outside the EU, we inform you that the countries in respect of which the European Commission has adopted pursuant to Art. 45 European Regulation 679/2016 related adequacy decisions can be checked at the following link [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en).

Otherwise, the transfer will take place only if the external controller, by signing the appointment as external controller, has declared that the transfer is guaranteed in accordance with Articles 46 and 47 European Regulation 679/2016.

## **4. Rights of the data subject**

You may at any time exercise your rights in respect of the joint data controllers pursuant to art. 15 of European Regulation 679/2016, which is summarised below:

- a. The data subject has the right to obtain confirmation of the existence or non-existence of personal data concerning him/her and their communication in intelligible form.
- b. The data subject has the right to be informed on:
  - the origin of personal data;
  - the purposes and methods of processing;
  - the criteria applied in the event of processing carried out through electronic devices;
  - the identification details of the controller and of the persons in charge of the treatment, if any;
  - the subject or categories of subjects to whom the personal data can be transferred or who may have access to them in their capacity as controllers or appointed persons, in or outside the territory of the State;
- c. The data subject has the right to obtain:
  - the update, rectification or, when interested, integration of the data;
  - the erasure, anonymisation or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or processed, unless the processing is necessary for compliance with a legal obligation required by Union or Member State law to which the data controller is subject
  - certification that the operations referred to in point 3) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated,

except where this proves impossible or involves a manifestly disproportionate effort compared with the right protected.

- d. The data subject has the right to object, in whole or in part:
- for legitimate reasons to the processing of personal data concerning him/her, even if pertinent to the purpose of collection, if there is no prejudice to the possible consequences referred to in art. 2 paragraph 2;
  - to the processing of personal data concerning him/her, for the purposes set out in art. 1, points 7, 8, 9.

The aforementioned rights shall be exercised by means of a request addressed without formalities to the joint controllers, also through an appointee, and shall be answered without delay.

The request addressed to the data joint data controllers may also be sent by registered mail to be addressed to CFA Italia Srl and/or CFA Society Italy, Milano, Via Gerolamo Borgazzi, 2 - 20122, or by e-mail to [privacy@cfasi.it](mailto:privacy@cfasi.it).

## **5. Termination of assignment and duration of processing**

In the event of termination of processing for any reason, your data will be:

- erased, once the preservation obligations imposed by art. 2220 of Codice Civile, art. 19 and 22 of D.P.R. no. 600/1973 (10 years) or other specific regulations have expired;
- transferred to another data controller, provided that they are to be processed for the same or similar purposes for which the data are collected (pre-bankruptcy and similar or related proceedings, transfer of business or business unit; etc.) pursuant to art. 6, comma 1, letter b) Eur. Reg. 679/2016;
- in the cases referred to in art. 1 points 7, 8 e 9 promptly erased and/or removed for the purposes specified therein, where technically possible. In the case such data have been disclosed to third parties for the purposes set out in this notice, it will be necessary to contact those parties directly.

## **6. Data controller**

The joint data controllers are CFA Italia Srl and CFA Society Italy, with registered office in Milan Via Gerolamo Borgazzi, 2 - 20122, e-mail [privacy@cfasi.it](mailto:privacy@cfasi.it).

## **7. Data processors**

The list of third party processors may be requested directly from the joint data controllers CFA Italia Srl and CFA Society Italy, Milano, Via Gerolamo Borgazzi, 2 - 20122, or sending an e-mail to [privacy@cfasi.it](mailto:privacy@cfasi.it).

Milano, 20 April 2023

**The joint data controllers: CFA Italia Srl and CFA Society Italy**

*For an in-depth examination of the matter, please refer to European Regulation 679/2016 and to the Italian legislation in force.*