

PRIVACY NOTICE

PURSUANT TO ART. 13 REGULATION (EU) NO. 679/2016 GDPR

WHEREAS:

For the purpose of a better understanding of what has been specified in the "privacy notice", it appears appropriate to list some definitions contained in the EU REGULATION 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), which according to which (Article 4), are to be understood as follows:

- a) 'processing' means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- b) 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- c) 'restriction of processing' means the marking of stored personal data with the aim of limiting their processing in the future;
- d) 'filing system' means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis;
- e) 'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- f) 'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- g) 'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- h) 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- i) 'recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. 2However, public authorities which may

receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

j) 'profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements. Given the above, Invictus Relocation Services ensures the security and confidentiality of its customers and guarantees that the data protection and processing will be carried out in accordance with the EU 679/2016 General Data Protection Regulation (GDPR) and with the Legislative Decree no. 196/2003 (Privacy Code), as modified by Legislative Decree no. 101/2018.

We inform the customer that the processing of his/her personal data for purposes related to the performance of the relocation service requested by him/her, will be carried out in accordance with principles of fairness, lawfulness and transparency, as provided for by the current regulations on personal data protection.

1. Nature of the provision of data

The provision of the personal data concerning the customer, of which Invictus Relocation Services will enter into/is in possession, are essential for the performance of the service requested. Any refusal to communicate the data will make it impossible to execute the service correctly.

2. Purposes and methods of data processing

Invictus Relocation Services holds the personal data voluntarily provided by the customer that will be used to achieve the purposes related to the completion of the services requested and related to the contract.

The customer's personal data will be processed electronically and/or analogically and consist of a series of operations related to their collection, registration, organization, structuring, preservation, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of making available, comparison or interconnection, limitation, cancellation or destruction (Article 4, no. 2), EU Regulation 679 / 2016).

Invictus Relocation Services will also process the customer's personal data either manually, using Computerized and automated means, for statistical analysis and the registration of the customer's e-mail address to the newsletter, in order to provide information, news, offers, events or initiatives promoted by Invictus Relocation Services, carry out market surveys and marketing studies, as well as proposals for services provided by the Owner.

Invictus Relocation Services will not in any way perform profiling of customer data.

3. Types of data processed

The processing operations will be carried out with reference to the customer's personal and fiscal

data. The types of data processed include, in particular: name and surname, title, address of origin and destination, gender, employer's name, office address, telephone number (s), e-mail address/es, address of withdrawal and delivery, nationality, passport details, hotel or temporary accommodation address, marriage certificate, birth certificate, work contract, lease contract, customs documentation, inventory of household goods and personal effects, flight / trip details, visa details, billing address, credit card details, social security number.

These data will be used for the purpose of giving a correct and complete execution to the assignment conferred so as to allow an efficient management of the commercial relationships, to the extent necessary to ensure the best performance of the service requested.

4. Communication and dissemination of data

Invictus Relocation Services undertakes to treat the data and information provided by the Customer with confidentiality, not disclose them to unauthorized persons, use them for purposes other than those for which they were collected or communicate or disclose them to third parties.

Personal data may be communicated to Invictus Relocation Services employees and/or collaborators, duly authorized to process personal data, who will process them according to the instructions given to them by the owner. We also inform the customer that such data may be communicated to the concerned parties whose knowledge is essential for the performance of the service, after signing a confidentiality agreement.

In no event, shall personal data be communicated, disseminated, distributed or otherwise transferred to third parties for illicit purposes and, in any case, without providing proper information to the concerned parties and acquiring their consent, when required by law. This shall be without prejudice to any request of the judicial authority or public security, under the conditions provided by the law.

Personal data shall not be transferred abroad, to countries or international organizations not belonging to the European Union that does not guarantee an adequate level of protection, recognized pursuant to art. 45 GDPR, on the basis of an EU Commission's decision on adequacy.

5. Transfer of personal data

To countries or international organizations outside the EU If, for the provision of services, it is deemed necessary that personal data be transferred to countries or international organizations outside the EU, for which the Commission has not adopted any decision on adequacy pursuant to art. 45 GDPR, this shall take place only if adequate guarantees are provided by the country or by the recipient organization, pursuant to art. 46 GDPR and on condition that the parties concerned have the right to pursue an action and the right to effective judicial remedies. In the absence of the Commission's decision on adequacy, pursuant to art. 45 GDPR, or adequate guarantees, pursuant to art. 46 GDPR, including binding corporate rules, a cross-border transfer shall take place only if one of the conditions specified in art. 49 GDPR occur.

6. Rights of the party concerned

Pursuant to Arts. 15-22 of the (EU) Regulation, 679/2016, the concerned party may exercise the

Following rights:



- ask for confirmation as to whether or not personal data concerning him or her are being processed;
- obtain indications as to the purpose of the processing, the category of the personal data, the recipients or category of recipients to whom the personal data have been or will be communicated, and, when possible, their storage period;
- obtain the rectification and deletion of personal data;
- obtain the limitation of the processing;
- obtain data portability, that is, receive them from the Owner of treatment, in structured format, of common use and readable from an automated device, and transmit them to another owner of the treatment without any impediments;
- object to an automated decision-making process relating to natural persons, including profiling;
 - if the processing is based on consent, revoke one's consent at any moment (ex Art.7 para. 3 GDPR).
 - if, pursuant to Art. 77 of the EU Regulation, the party concerned is of the view that the processing of his/her personal data is in breach of said regulation, he/she has the right to file a complaint to the supervisory Authority.

The internal reference point acknowledging the concerned party's complaint is the Legal Department that may be contacted by sending an email to the address info@invictus-relo.com

7. Data storage

Personal data provided by customers shall be stored for a period of time not exceeding the time necessary for the purposes for which they have been collected or later on processed. Their deletion shall however be securely carried out.

8. Owner of and person responsible for data processing and Data Protection Officer

The owner of data processing is Invictus Relocation Services, with registered office in São Marcos do Cacém, Rua Cidade de São Paulo nº 5 7º B 2735-656 São Marcos do Cacém, VAT No. 510901824, in the person of its Legal Representative Mr. Fábio Medeiros.

The person responsible for data processing is Invictus Relocation Services, with registered office in São Marcos do Cacém, Rua Cidade de São Paulo nº 5 7º B 2735-656 São Marcos do Cacém, VAT No. 510901824, in the person of its Legal Representative Mr. Fábio Medeiros.