

PRIVACY AND COOKIE POLICY
revised in line with Reg EU 2016/679
(European Regulation on the subject of the protection of personal data)

COSM CONSULTING SRL, registered office SAN BENEDETTO DEL TRONTO (AP) Via E. MATTEI n.1 values the user's privacy and is committed to respecting the user's privacy. This privacy policy ("Privacy Policy") describes the personal data processing activities carried out by the Data Controller via the www.cosmoconsulting.it site and the relative commitments assumed in that sense by the Company. The Data Controller may process the user's personal data when s/he visits the Site and uses the services and the functions present in the Site. In those sections of the Site in which the user's personal data is gathered a specific statement is normally made informing the user of this, in accordance with art.13/15 of Reg. EU 2016/679.

Where provided for by Reg. EU 2016/679 the user's consent will be requested before proceeding to the processing of their personal data. If the user supplies the personal data of third parties, s/he must ensure that the communication of data to the Data Controller and its subsequent processing for the purposes specified in the applicable privacy policy conforms to Reg. EU 2016/679 and to the applicable rules.

In addition, this Privacy Policy:

- is intended delivered to the site www.cosmconsulting.it which is managed by the Data Controller;
- constitutes an integral part of the Site and the services we offer;
- is also to be understood as a Statement delivered in accordance with art. 13/15 of Reg. EU 2016/679 to those who interact with the web services of this Site;

The Data Controller informs the user that the processing of her/his personal data will be characterised by principles of accuracy, lawfulness, clearness and the protection of her/his privacy and her/his rights. Thus his personal data will be processed in accordance with the regulations and the privacy obligations therein provided for.

1) PERSONAL DATA OF THE DATA CONTROLLER, DATA PROCESSOR AND PRIVACY OFFICER

Once the services of the site have been used or the site consulted, data relating to identified or identifiable natural persons can be processed. The personal data of the Data Controller and the Data Processor of the Site are the following:

The Data Controller subject of this policy is the COSM CONSULTING SRL company, registered office SAN BENEDETTO DEL TRONTO (AP) Via E. MATTEI n° 1 certified email address cosmconsultingsrl@pec.it

- The company has 2 operational offices:
- Milan, Via Appiani Andrea n. 12
- Rome, Via Germanico n. 101

Each office carries out all the operations of processing personal data. HORTON INTERNATIONAL ITALY srl, registered office in MILAN via Lattuada Serviliano n. 26, certified email address horton@legalmail.it is Joint Controller.

The Joint Controller is appointed via an internal agreement pursuant to article 26 Reg. EU 2016/679 which stipulates roles and responsibilities; those who are interested can examine the above-mentioned agreement on explicit request.

The Data Protection Officer is Mr. Enrico Ubaldi, email u.enrico@me.it, telephone 3460221597.

The updated list of names of other individuals appointed as Data Controllers and/or Data Protection Officers is available at the registered office and the local offices of the company.

Dependent on the type of processing, the user's personal data may be brought to the knowledge of the Data Controller's employees or collaborators and the Joint Controller of processing as well as administrative, sales, legal, accounting workers or information technology systems administrators, who, working under the direct authority of the latter, are appointed managers or charged with processing the data in accordance with REG EU 679/2013 and who receive appropriate instruction with regard to this.

2. PERSONAL DATA SUBJECT OF PROCESSING

To visit or consult the Site does not generally imply the collection and processing of the user's personal data except for data concerning navigation and cookies as specified below. In addition to the so-called "navigation data" (see elsewhere), personal data volunteered by the user when he interacts with the features of the Site or asks to makes use of services offered by the Site may be the object of processing. In compliance with the Privacy Code, the Data Processor may also collect personal data from the user through third parties while carrying out his own work.

2.a Navigation data

The information technology systems and the software procedures put in place for the functioning of the Site, acquire, in the course of their normal working, some personal data, the transmission of which is implicit in the use of Internet communication protocols. It is information that is not collected to be linked to identified subjects, but that by their very nature could, through processing and association with data kept by third parties, allow the users to be identified. This category includes: IP (Internet Protocol) addresses or computer domain names belonging to users that connect to the site, addresses in URI (Uniform Resource Identifier) notation of the resources requested, the time of the request, the method used to submit the request to the server, the dimension of the file obtained in response, the numeric code indicating the state of the response given by the server (positive outcome, error, etc.), other parameters relating to the operating system and the user's information technology environment. This data is used in order to gain anonymous statistical information about the use of the site and to check its correct working in order to allow – given the architecture of the systems used – the correct provision of services, for reasons of security and to ascertain responsibility in the case of possible computer crimes against the Site or third parties.

2.b Data voluntarily provided by the user

The Site offers users the possibility of voluntarily providing personal information via, for example, registering for contact, requesting services, information or offers, the optional, explicit and voluntary sending of email to the addresses indicated in the Site, etc.

3) COOKIES AND NAVIGATION DATA

The Site uses "cookies". By using the Site, the user consents to the use of cookies in compliance with this Privacy Policy. Cookies are small files memorised on the hard disk of the user's computer. There are two macro-categories of cookies: technical cookies and profiling cookies. Technical cookies are necessary for the correct working of a web site and to allow the user to navigate; without them the user might not be able to display the pages correctly or to use some services. Profiling cookies have the task of creating user profiles in order to send advertising messages consistent with the user's preferences shown by the same whilst browsing. In addition, cookies can be classified as:

– "session cookies", which are immediately cancelled when the browser is closed;

– "persistent" cookies, which remain within the browser for a set period of time. They are used, for example, to recognise the device which connects to a site, facilitating authentication operations for the user;

– "own" cookies, created and managed directly by the website manager on which the user is navigating;

“third party” cookies, created and managed by individuals other than the manager of the website on which the user is navigating.

4) COOKIES USED ON THE SITE

The Site uses the following types of cookie:

- 1) own cookies, session cookies and persistent cookies, necessary to allow navigation on the Site and for the internal security and administration of the system;
- 2) third party session and persistent cookies, necessary for the user to use multimedia elements present on the Site, such as pictures and videos;
- 3) third party persistent cookies, used by the Site to send statistical information to the Google Analytics system, via which the Data Controller can carry out statistical analysis of access/visits to the Site. The cookies used pursue exclusively statistical purposes and collect information in aggregate form. Using two cookies, one persistent and one a session cookie (which expires when the browser is closed), Google Analytics also saves a register with the times at which the visit to the Site started and finished. You can stop Google reading data via cookies and its subsequent processing of data by downloading and installing the plug-in for browsers from the following address: <http://tools.google.com/dlpage/gaoptout?hl=it>
- 4) third party persistent cookies used by the Site to include the buttons of some social networks (Facebook, LinkedIn and Google+). Choosing one of these buttons, the user can publish the contents of the website page he is visiting on his own personal page of the relevant social network.

The Site may contain links to other sites (so-called third party websites). The Data Controller does not access or control any cookie, web beacon or other technologies to trace users that could be used by third party websites which the user may access from the Site. The Data Controller does not carry out any control on the contents and material published by or obtained via third party sites, nor on the relative method of processing the user’s personal data and explicitly declines any responsibility for such eventualities. The user is obliged to verify the privacy policy of third sites he accesses through the Site and to inform himself about the conditions concerning the processing of his personal data. The present Privacy Policy applies only to the Site as defined above.

5) HOW TO DISABLE COOKIES IN BROWSERS

How to visualise and modify cookies

For further information on how to set up preferences on the use of cookies using a browser, consult the relevant instructions on:

- Internet Explorer
- Chrome
- Safari
- Firefox
- Opera
- Android (mobile device)
- Safari (mobile device)
- Windows Phone (mobile device)
- Blackberry (mobile device)

For further information on cookies and managing preferences on cookies (be they first and/or third parties), users are invited to visit the www.youronlinechoices.com platform. Please remember though that disabling navigation cookies or functional cookies may result in the malfunctioning of the Site and/or limit the service the Site offers.

Useful links:

- Fundamentals of security and privacy for Google Analytics:
<https://www.google.com/analytics/learn/privacy.html?hl=it>
- Analytics policy on privacy and Google data protection:
<https://support.google.com/analytics/answer/6004245?hl=it>;
- Google terms of service: <http://www.google.com/analytics/terms/it.html>

•If you wish to prevent the installation of Google Analytics cookies on your terminal, you can install this component in your browser:

<https://tools.google.com/dlpage/gaoptout?hl=it>

- Check the information used by Google to display advertisements to you: Link
- Facebook cookie policy

6) STORAGE OF PERSONAL DATA

Personal data are stored and processed using information technology systems belonging to the Data Controller and managed by the same or by third party suppliers of technical services. Data processing will be carried out either manually with the help of means of information technology or telecommunications technology by means of the persons who have been expressly charged with doing this. In relation to the purposes indicated the data may be kept both in paper and electronic archives, even in an automated form, so as to allow the identification of aggregate or specific data. In any case the processing of data will take place with a logic closely associated with the purposes indicated, in a way that guarantees the security and privacy of the same data, through the adoption of measures that are suitable to prevent the modification, cancellation, destruction, unauthorised access or processing that has not been agreed or does not comply with the purposes of its collection. The company does not handle Special Categories, as the purpose itself of the processing does not foresee its usefulness. The company confirms to all those concerned that it will process freely transmitted data exclusively in order to carry out its consulting activity in the field of Search and Selection of Personnel, be they charged to do so by a Client Company or on their own account.

7) PURPOSE AND METHODS OF DATA PROCESSING

The Data Controller may process the user's public and sensitive data for the following purposes: use of the services and features present on the Site by the user, handling requests and recommendations on the part of its own users, sending newsletters, handling the candidacies received via the Site, etc. For certain services (e.g. sending curriculums) an adequate briefing and specific permission are foreseen. Personal data is processed both in paper and electronic form and inserted in the company information technology system in full compliance with Reg EU 2016/679, including safety and confidentiality profiles and taking inspiration from the principles of correctness and lawfulness of processing. In compliance with Reg EU 2016/679 data are kept and held for 5 years.

8) SECURITY AND QUALITY OF PERSONAL DATA

COSM CONSULTING commits itself to protecting the security of the user's personal data and respects the regulations concerning security provided for by the applicable norms in order to avoid data loss, illegitimate or illicit use of data and non-authorised access to the same. In addition, the information technology systems and the information technology programs used by COSM CONSULTING are programmed in such a way as to reduce to the minimum the use of personal and identifying data; such data is processed only to obtain specific purposes from time to time. The Data Controller uses various advanced security technologies and procedures designed to favour the protection of users' personal data; for example, the personal data is stored on secure servers located in places with protected and controlled access. The user may help the Data Controller to update and keep his own personal data accurate by communicating any change relating to his address, qualifications, contact details, etc.

9) FIELD OF COMMUNICATION AND DATA ACCESS

In order to achieve the above-indicated aims, the personal data sent may be communicated to public or private client individuals who will have invested the company to carry out research, selection and assessment of personnel in their favour. To this purpose and inasmuch as it is strictly necessary in relation to the selection procedure or in-depth evaluation of personnel, the personal data of the individual concerned shall be published and/or communicated to individuals in other offices, even to individuals outside the Company who are charged with processing the data. For the same purposes the personal data may be communicated to and/or handled by the company that is the Joint Controller with the aim of transferring the data to countries both within and outside the European Union; each

further communication or publication will take place with the agreement of the person concerned, although the same has the right to indicate those individuals and categories of individuals to whom the data must not be communicated. What's more, data may be communicated: to all individuals whose right to access such data is recognised by regulatory measures; to our collaborators and employees, in the area of their relative tasks; to all those natural and/or legal persons, public and/or private when such communication is necessary or functional to the performance of our activity and in the ways and for the purposes above illustrated; to companies with which we collaborate, in particular to HORTON INTERNATIONAL ITALY srl, registered office via Lattuada Serviliano n:26, MILAN, certified email address: horton@legalmail.it and also to local offices of the same company, that will handle together with Cosm Consulting the personal data acquired in compliance with their reciprocal agreements, with their purposes and within the limits of what is necessary to discharge the task received.

10) NATURE OF PROVISION OF PERSONAL DATA

The provision of some personal data by the user is obligatory to allow the Company to manage communications, requests received from the user or to re-contact the same, following up on his request. This type of data is marked by an asterisk [*] and in this case the provision of information is obligatory in order to allow the Company to continue with the request that could not be completed if the information were not provided. On the contrary, the collection of other data not marked by an asterisk is optional: not supplying this data has no consequences for the user.

11) RIGHTS OF THE PERSON CONCERNED

11.1 Art. 15 (right of access), 16 (right of correction) of Reg. EU 2016/679

The person concerned has the right to receive confirmation from the Data Controller as to whether his personal data is being processed or not and should it be so, has the right to gain access to his personal data and the following information::

- a) the purposes of processing;
- b) the personal data categories in question;
- c) the recipients or the recipient categories to whom personal data has been or will be communicated, in particular if the recipients are of third party countries or international organisations;
- d) the foreseen length of data storage or, if this is not possible, the criteria used to determine such a period;
- e) the existence of the right of the person concerned to ask the Data Controller for the correction or cancellation of personal data or the restriction on personal data processing that concern him or to oppose their processing;
- f) the right to submit a complaint to a supervising authority;
- g) the existence of an automated decisional process, including profiling, and as a minimum in such cases, meaningful information on the logic used as well as the importance and the consequences foreseen of such processing for the individual involved.

11.2 Right of which art. 17 of Reg. EU 2016/679 - right to cancellation («right to oblivion»)

The person concerned has the right to obtain from the Data Controller the cancellation of personal data that concern him without any unjustified delay and the Data Controller has the obligation to cancel the personal data without any unjustified delay, if one of the following reasons exists:

- a) the personal data is no longer necessary with respect to the purpose for which it was collected or otherwise handled;
- b) the person concerned revokes his agreement on which the handling is based in conformity with article 6, paragraph 1, letter a), or with article 9, paragraph 2, letter a), and if no other juridical grounds exist for its handling;

- c) the person concerned opposes the handling in accordance with article 21, paragraph 1, and no prevailing legitimate reason exists to proceed with the handling, or if the person concerned opposes the handling in accordance with article 21, paragraph 2;
- d) the personal data has been handled illicitly;
- e) the personal data must be cancelled so as to fulfil a legal obligation foreseen by the law of the European Union or of the member State of which the Data Controller is a subject;
- f) the personal data has been collected in relation to the proposal of services of the data company as in article 8, paragraph 1 of Reg. EU 2016/679.

11.3 Right of which refer to art. 18 Right to limitation of processing

The person concerned has the right to obtain limitation of processing from the Data Controller when one of the following events occurs:

- a) The person concerned disputes the accuracy of the personal data; for the time necessary for the Data Controller to verify the accuracy of the data in question;
- b) the handling is illicit and the person concerned opposes the removal of personal data and asks instead that its use be restricted;
- c) although the Data Controller no longer needs the personal data for the purposes of processing, the data is necessary to the person concerned for the verification, the exercise or the defence of a right in a place of law;
- d) the person concerned opposes processing in accordance with article 21, paragraph 1, Reg EU 2016/679 pending the verification concerning the eventual prevalence of legitimate reasons of the Data Controller in relation to those of the person concerned.

11.4 Right as of art.20 Right to data portability

The person concerned has the right to receive, in a structured, common format that can be read by an automatic device, any personal data that concerns him and provided to a Data Controller. The person concerned also has the right to transmit such data to another Data Controller without any impediments on the part of the first Data Controller.

12. ANNULMENT OF AGREEMENT TO DATA PROCESSING

The power of the person concerned to annul the agreement consenting to the processing of her/his personal data is recognised and is achieved by sending a registered letter with return of receipt to the following address: COSM CONSULTING SRL registered office Via E. MATTEI n.1 SAN BENEDETTO DEL TRONTO (AP) certified email address cosmconsultingsrl@pec.it along with a photocopy of a valid identity document, with the following text: <<Annulment of agreement to the processing of all my personal data>>. At the end of this operation the personal data shall be removed from all archives in the shortest time possible.

Should the person concerned wish to have further information on the processing of personal data, or exercise those rights given in point 6, they can send a registered letter with return of receipt to the following address: COSM CONSULTING SRL registered office Via E. MATTEI n.1 SAN BENEDETTO DEL TRONTO (AP) certified email address cosmconsultingsrl@pec.it. Before being able to supply, or modify, any information, it may be necessary to check the identity of the person and ask them to answer some questions. An answer will then be provided as soon as possible.