

**PRIVACY POLICY FOR CONTACT PERSONS OF CLIENTS ARTS. 13 and  
14 OF REGULATION (EU) 2016/679 ("GDPR")**

**1. CONTACT DETAILS OF THE DATA CONTROLLER AND THE DATA PROTECTION OFFICER**

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| <b>DATA<br/>CONTROLLER</b> | <b>W Executive España S.L.</b><br>Registered office: Paseo de la Castellana 85<br>28046 Madrid<br>Tax Code (CIF): B72971385<br>E-mail: <a href="mailto:info@wexecutive.es">info@wexecutive.es</a><br>(hereinafter referred to as "W Executive" or the<br>"Controller") |
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**2. CATEGORIES OF DATA PROCESSED AND SOURCE OF DATA**

2.1. As part of the relationship that links W Executive with the **Client**, W Executive will collect and process your personal data (hereinafter referred to as the "**Personal Data**"), in your capacity as a contact person for W Executive.

This information will include the identifying and contact data necessary for your professional traceability: name, surname, tax identification number, landline and mobile telephone numbers, and email address.

2.2. The Personal Data will have been provided by you or by the Client, considering your relationship with them, via mail, fax, email, hand delivery at their premises, or through the Registration Form made available to the data subject and included in our database.

**3. PURPOSE AND LEGAL BASIS FOR PROCESSING**

The above-mentioned Personal Data will be processed by W Executive for the following purposes and on the following legal basis:

- (i) Management, development, and maintenance of the commercial, contractual, institutional, or any other kind of relationship established with the Client you represent or to whom you provide services. The legal basis for this processing is the legitimate interest of W Executive in managing, developing, and maintaining the relationship established with the Client.
- (ii) Internal administrative management of W Executive, including the creation and management of a database of supplier and client contacts (CRM), which includes the Client's data along with their contact details, to maintain future business relationships with the Client.

This processing is based on the legitimate interest of W Executive in properly managing the development of its business activities. To this end, W Executive has conducted a detailed assessment of the balance between these legitimate interests and the adequate protection of your rights and interests, adopting the necessary measures to guarantee them. The result of this assessment can be consulted by the employee upon request sent to the e-mail address: [privacy@wexecutive.es](mailto:privacy@wexecutive.es).

You may at any time object to this processing, as indicated in the section on the rights of the data subject.

- (iii) Counsel and defense of the rights and interests of the W Executive before judicial and administrative bodies. This processing is based on the legitimate interest of W Executive in ensuring the company's right to effective judicial protection.

W Executive has conducted a detailed assessment of the balance between these legitimate interests and the adequate protection of your rights and interests, adopting the necessary measures to guarantee them. The result of this assessment can be consulted upon request sent to the email address [privacy@wexecutive.es](mailto:privacy@wexecutive.es).

- (iv) The sending of commercial communications of W Executive products and services similar to those initially contracted. This processing is legitimised by the exception contained in Article 21.2 of Law 34/2002, of 11 July, on Information Society Services and Electronic Commerce. In any case, please be aware that each communication we send will include a simple and free procedure for you to object to receiving such communications in the future, and you may object at any time.

- (v) Communication of your data to other group entities to offer you services provided by them. This communication and the related actions by the Group companies will only take place if you give us your consent by ticking the box at the end of this form. The entities that make up the Group can be consulted at the following link: [www.w-group.it](http://www.w-group.it).

You may revoke the consent given at any time, as indicated in the section on rights of the data subject.

#### **4. RETENTION**

Personal Data will be retained as long as the commercial, contractual, or any other kind of relationship established with the entity you represent is maintained.

Similarly, if you have not objected to the processing of your data for internal management by W Executive or the sending of commercial communications through electronic means related to products or services similar to those previously contracted, W Executive will retain your data until you exercise your right to object to the processing of your data for these purposes.

If you have given your consent for your data to be communicated to other entities within the Group, W Executive will continue to process your personal data until you revoke your consent.

Once these retention periods have elapsed, your data will be retained, properly blocked, for the duration of the limitation periods for the legal obligations of the Controller and for any potential liabilities arising from the processing of said data.

## **5. RECIPIENTS**

5.1. Personal Data may be communicated, to fulfil obligations and improve the management of W Executive and the group to which it belongs, to the following entities:

- (i) Public administrations in compliance with the applicable legal provisions, in particular in tax matters.
- (ii) Public administrations that request them as part of an inspection process or an administrative procedure.
- (iii) Judicial and administrative bodies when necessary as part of a case brought before them based on the legitimate interest of the Company in guaranteeing its right to effective judicial protection.
- (iv) Group companies of W Executive, when you have given consent for this as indicated in section 3 of this clause.

5.2. Furthermore, your data may be accessed on behalf of and in the name of W Executive by service providers designated as data processors or by persons authorised to process data. In these cases, the Controller undertakes to ensure the security of your data and to sign the corresponding data processing agreement with these providers, as established in personal data protection regulations.

## **6. LOCATION AND TRANSFER OF DATA**

6.1. For the processing of personal data, W Executive uses an IT infrastructure located within the European Union.

6.2. Personal data of the data subjects may be transferred to service providers located outside the European Economic Area, resulting in an international transfer of your

data. Therefore, W Executive has adequate safeguards in place in accordance with data protection regulations, such as the signing of Standard Contractual Clauses, including the corresponding transfer impact assessment. You can obtain a copy of these safeguards from the Data Protection Officer.

## **7. RIGHTS OF THE DATA SUBJECT**

You have the right to access your personal data, as well as to request the rectification of inaccurate data or, where appropriate, to request its deletion when, among other reasons, the data are no longer necessary for the purposes for which they were collected or you withdraw your consent to the processing, when the data were necessary for these purposes.

In certain circumstances, you may also request the limitation of the processing of your data, in which case they will only be retained for the exercise or defence of claims.

Furthermore, when the processing is based on the fulfilment of a task carried out in the public interest or to satisfy the legitimate interests of the Company, and for reasons related to your particular situation, you may object to the processing of your data. The Company will stop processing the data, except in those cases in which it is necessary to continue with the processing for legitimate reasons, or for the exercise or defence of possible claims.

You may exercise these rights by sending a written request to the Controller, to the postal address indicated above or to the e-mail address [privacy@wexecutive.es](mailto:privacy@wexecutive.es).

You can also contact the Data Protection Officer at the following address: [...]. You also have the right to lodge a complaint with the Spanish Data Protection Agency via its website [www.aepd.es](http://www.aepd.es).

### **DECLARATION THAT YOU HAVE READ THE INFORMATION**

I declare that I have received and read the information about the processing of my Personal

Data. In \_\_\_\_\_, on / / \_\_\_\_

Legible First Name and Surname \_\_\_\_\_

Signature \_\_\_\_\_

*[ONLINE]*

I declare that I have received and read the information about the processing of my Personal Data.

**CONSENT FOR COMMUNICATING CLIENT CONTACT PERSONS' DATA TO OTHER ENTITIES OF W  
GROUPHOLDINGS S.P.A.**

- I consent to W Executive communicating my personal data to group entities for the purpose of receiving notifications about services offered by W Group Holding S.P.A.