

Privacy Policy

Pursuant to Articles 13 and 14 of EU Regulation 679/2016 ("GDPR")

CFP Associati S.r.l. hereby informs you that it intends to collect, including verbally, directly or through third parties, or already holds, certain data about you classified as personal data, the processing of which is carried out in compliance with fundamental rights and freedoms, as well as the dignity of the data subject, with particular reference to confidentiality, personal identity, and the right to and protection of personal data.

Special categories of data will also be processed, which must be provided by you as the data subject or by third parties, such as policyholders of group or individual policies that designate you as the insured, beneficiary, owner of the insured property, or the injured party (as in the case of liability insurance policies), or from databases consulted during the pre-underwriting, underwriting, or claims settlement phases.

That said, CFP Associati S.r.l. provides you with this notice regarding the purposes and methods of processing the personal data collected, the scope of their communication and dissemination, and the nature of their provision, noting that such processing takes place in the context of analyses required by law or regulation, the establishment and execution of existing or prospective commercial relationships, and the consulting relationships you have requested, as provided for by sector-specific laws or regulations.

DATA CONTROLLER

CFP Associati S.r.l., with registered office in Milan, Via Boccaccio 15, and operating in Milan, Via Oldofredi 41, Tel. +39 02.91550498, Email: info@cfp-associati.com , Certified Email: cfpassociatisrl@legalmail.it - RUI Registration No. B000701844.

PURPOSE OF PROCESSING AND LEGAL BASIS

The data may be processed

1. for the management of the specific activities of CFP Associati S.r.l., in its capacity as an insurance broker, and for the fulfillment of mandatory obligations such as:
 - compliance with obligations under laws, regulations, or EU directives, as well as with instructions issued by authorities legally empowered to do so or by supervisory and regulatory bodies, including those in the insurance sector;
 - providing advice and support aimed at proposing products and services suited to your needs and at entering into contracts to be activated at your initiative;
 - mediation with insurance or reinsurance companies carried out in your interest following your instruction;
 - conclusion, management, and execution of the mandate as well as related activities;
 - prevention and detection of insurance fraud and related legal actions, as well as compliance with anti-money laundering regulations;
 - management of the operational and administrative requirements of contracts concluded with our assistance, in relation to insurance risk coverage;

CFP Associati s.r.l.

Sede legale: Via G. Boccaccio, 15 20123 Milano (MI)
Sede operativa: Via E. Oldofredi, 41 20124 Milano (MI)
Codice Fiscale e Partita IVA: IT12144410961
Iscrizione RUI: B000701844
SDI: T9K4ZHO

e-mail: info@cfp-associati.com
pec: cfpassociatisrl@legalmail.it
Tel. + 39 02 91550498
cell: + 39 3932706785
www.cfp-associati.com

- management, consultation, support, and settlement regarding claims with insurance companies; In this context, the processing of special categories of data may occur for the purpose of:
 - provide insurance and reinsurance brokerage services, including the management and settlement of anticipated claims;
 - defend a right in court or before other authorities with judicial functions;
2. for marketing, commercial promotion (whether our own or third-party), and analysis (for which only common personal data will be processed, subject to the provision of appropriate consent), such as:
- information and/or commercial promotion, to illustrate new opportunities that may be of interest to you, via mail, telephone, or electronic communications such as email, fax, SMS or MMS messages, and other automated systems available for this purpose, aimed at informing you about new insurance services and products suited to your risk profile and at improving the products and services offered, as required of intermediaries by current regulations, without prejudice to your right to object, in whole or in part, to the aforementioned purposes;
 - information and/or commercial promotion, to present new opportunities that may be of interest to you, via mail, telephone, or electronic communications such as email, fax, SMS or MMS messages, and other automated systems available for this purpose, aimed at informing you about new services and products—including those of third parties—for which CFP Associati S.r.l. is authorized by laws, regulations, or specific mandates and/or contracts to handle marketing;
 - market research and surveys on service quality and your satisfaction, including through the use of specialized companies, with the aim of improving the range of products and services;
 - disclosure of your personal data to third parties operating in the sector indicated in the relevant consent request, for the purposes of providing information and commercial promotion of products or services by such third parties;
 - profiling aimed at analyzing your insurance needs and requirements to identify, including through electronic processing, potential products or services aligned with your preferences and interests. Such analyses may lead to the formulation of specific and personalized insurance product offers reserved for you and communicated exclusively via the contact details provided.

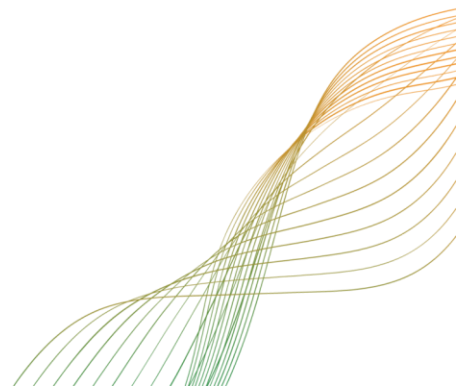
The data subject to profiling—from which data capable of revealing health status and sexual life are strictly excluded—with reference to identifiable customers, may be retained for profiling purposes for a period not exceeding twelve months from their recording, unless they are effectively anonymized in a manner that does not allow, even indirectly or by linking to other databases, the identification of the data subjects: The profiling activity will be carried out using data strictly necessary for the pursuit of the stated purposes.

All data you provide is therefore processed exclusively for purposes related to the activities of CFP Associati S.r.l., the legal bases for which can be found in your consent (e.g., for the processing of “special categories of personal data” or for marketing/profiling), in the performance of a contract to which you are a party or in the implementation of pre-contractual measures taken at your request and/or in compliance with legal obligations to which the undersigned Data Controller is subject and/or in the legitimate interest of the same.

CFP Associati s.r.l.

Sede legale: Via G. Boccaccio, 15 20123 Milano (MI)
Sede operativa: Via E. Oldofredi, 41 20124 Milano (MI)
Codice Fiscale e Partita IVA: IT12144410961
Iscrizione RUI: B000701844
SDI: T9K4ZHO

e-mail: info@cfp-associati.com
pec: cfpassociatisrl@legalmail.it
Tel. + 39 02 91550498
cell: + 39 3932706785
www.cfp-associati.com





MANDATORY AND OPTIONAL NATURE OF DATA PROVISION AND CONSEQUENCES OF A POSSIBLE REFUSAL

The provision of personal data and its subsequent processing by CFP Associati S.r.l., for the purposes set forth in point 1, are necessary for the establishment, continuation, and proper management of the relationship between the Data Controller and the Data Subject, as well as strictly necessary for the management and execution of existing relationships or the handling of claims: such provision must therefore be considered mandatory under law, regulation, or EU legislation (including, but not limited to, anti-money laundering regulations): any refusal to provide the requested personal data may make it impossible, in whole or in part, to finalize and manage the existing or prospective consulting relationship.

The provision of personal data and its subsequent processing by CFP Associati S.r.l. for the purposes referred to in point 2 is optional, and failure to provide such data, even partially, will not affect the execution of any insurance policies that may have been entered into, but will only prevent the performance of the activities indicated in the aforementioned point.

METHODS OF PROCESSING

The processing of personal data will be carried out both on paper, using manual tools, and with the aid of electronic tools through appropriate IT and telecommunications procedures, using systems and databases owned by the undersigned, designed to store, manage, and transmit data, using methods and procedures that ensure their security and confidentiality.

CFP Associati S.r.l. guarantees that the data processed will always be relevant, complete, and not excessive in relation to the purposes for which they are collected, with your commitment to promptly communicate any corrections, additions, or updates; specific security measures are observed to prevent data loss, unlawful or improper use, and unauthorized access.

RETENTION PERIODS

Personal data will be processed for the time strictly necessary to achieve the purposes described above, to fulfill contractual, legal, and regulatory obligations, subject to statutory limitation periods and legal provisions, in compliance with rights and in accordance with the resulting obligations.

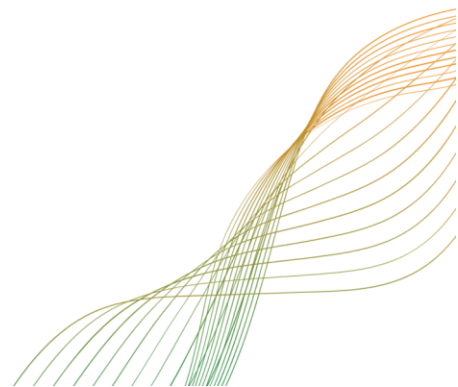
In particular, the data will be retained for the duration of your status as an insured party with the undersigned Data Controller (especially regarding “special categories of data” or “profiling”), as well as in accordance with specific legal provisions on insurance and tax matters concerning the processing of administrative and accounting data.

With regard to data collected for commercial purposes (as referred to in point 2), the retention period is limited—for profiling activities—to 1 year from the date of collection and 2 years for direct marketing activities. Finally, the insured’s personal data may also be retained for as long as permitted by Italian law to protect the legitimate interests of the Data Controller (Art. 2947, paras. 1 and 3 of the Italian Civil Code), such as for the management of any complaints, disputes, or litigation between the parties.

CFP Associati s.r.l.

Sede legale: Via G. Boccaccio, 15 20123 Milano (MI)
Sede operativa: Via E. Oldofredi, 41 20124 Milano (MI)
Codice Fiscale e Partita IVA: IT12144410961
Iscrizione RUI: B000701844
SDI: T9K4ZHO

e-mail: info@cfp-associati.com
pec: cfpassociatisrl@legalmail.it
Tel. + 39 02 91550498
cell: + 39 3932706785
www.cfp-associati.com





SCOPE OF DATA ACCESS

The processing of personal data will be carried out, within the limits of the general authorizations issued by the Italian Data Protection Authority, by persons expressly and specifically designated by the Data Controller, acting as data processors or persons in charge of processing. The data may also be processed by third parties (s), whom we engage to provide services related to the intended purpose; our organization will assess on a case-by-case basis whether to appoint these third parties as data processors to ensure greater protection. In all cases, these parties will process the data in accordance with the instructions received from the Data Controller, in accordance with the operational roles assigned to them in relation to the functions performed, limited to what is necessary and instrumental for the execution of specific operations within the scope of the requested services and exclusively for the achievement of the purposes indicated in this policy.

The list of Data Processors, which is constantly updated, may be requested by sending a communication in the manner indicated in the following section regarding the data subject's rights.

COMMUNICATION AND DISCLOSURE

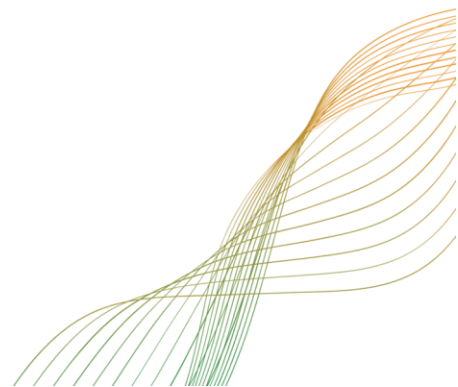
The data may be disclosed (meaning the act of making it known to one or more specific parties, other than the Data Controller, the Data Processors—both internal and external to the company—and the persons in charge of processing identified and appointed for the pursuit of the purposes indicated above and in any case within the limits thereof), as follows:

- to public and private entities, such as independent Data Controllers, who may access the data pursuant to provisions of law, regulations, or EU legislation, within the limits set forth by such rules;
- to external parties, including those in the insurance and financial sectors, who perform auxiliary activities related to data processing on behalf of CFP Associati S.r.l., and who may act as data processors on behalf of the Data Controller, bound by the signing of specific clauses or agreements imposing a duty of confidentiality, security, and the guarantee of compliance with Italian and European privacy regulations and subsequent amendments; or parties whose involvement is necessary or functional to the fulfillment of legal and contractual obligations toward other entities in the insurance sector with which the undersigned maintains or will maintain relationships of mutual collaboration pursuant to Law 221/2012. Such parties may:
 - perform on our behalf IT, telecommunications, financial, administrative, archiving, printing, and mailing services, as well as the management of transport and sorting of communications to customers;
 - belong to or operate within the so-called “insurance chain” with specific technical, organizational, or operational tasks (including, but not limited to, insurance companies, agents, sub-agents, producers, claims adjustment centers, brokers, financial advisors, banks, and SIMs); as well as
 - playing an active role due to the existing insurance relationship with you (policyholders, insured parties, beneficiaries, co-obligors);
 - conducting surveys regarding the quality of services provided, customer satisfaction, etc.

CFP Associati s.r.l.

Sede legale: Via G. Boccaccio, 15 20123 Milano (MI)
Sede operativa: Via E. Oldofredi, 41 20124 Milano (MI)
Codice Fiscale e Partita IVA: IT12144410961
Iscrizione RUI: B000701844
SDI: T9K4ZHO

e-mail: info@cfp-associati.com
pec: cfpassociatisrl@legalmail.it
Tel. + 39 02 91550498
cell: + 39 3932706785
www.cfp-associati.com





The data will not be disclosed, meaning that it will not be made known to unspecified parties in any way, including by making it available or accessible for consultation, unless specific, free, and informed consent is granted for each type.

CFP Associati S.r.l. uses cloud services from providers selected among those offering adequate safeguards, as required by Article 46 of the GDPR 679/16; specifically, the company's management platform is, hosted on servers located in Switzerland—and thus outside the EU—for which the European Commission has issued so-called "adequacy decisions."

RIGHTS OF THE DATA SUBJECT

Data subjects, to whom the personal data refer, have the right to exercise their rights at any time (Right of access to personal data and other rights), in particular: the right to obtain confirmation of the existence or otherwise of their personal data, to access such data and to know its content and origin, to verify its accuracy, to request its completion or updating, restriction of processing, or portability. Correction and blocking may be requested if the data is incomplete, incorrect, or collected in violation of applicable law; in this regard, it is also possible to object to their processing for legitimate reasons or to any automated decision-making process (including profiling), and it is also possible to request, for the same reasons, the erasure of such data provided it complies with applicable regulations and provided there are no other retention or processing obligations incumbent upon CFP Associati S.r.l. Data subjects also have the right to object to the processing of their personal data for marketing purposes (as indicated in point 2), even if carried out via automated contact methods; this right also extends to traditional methods, and data subjects may exercise these rights in whole or in part (e.g., only regarding communications via SMS, email, or telephone, or by objecting solely to the sending of promotional communications via automated means, etc.).

Regarding the exercise of the rights listed above, the data subject may submit requests via a specific written communication by mail to the Data Controller's headquarters or via the email address info@cfp-associati.com or to the certified email (PEC) address cfpassociatisrl@legalmail.it

A response may take up to 30 days to process the request.

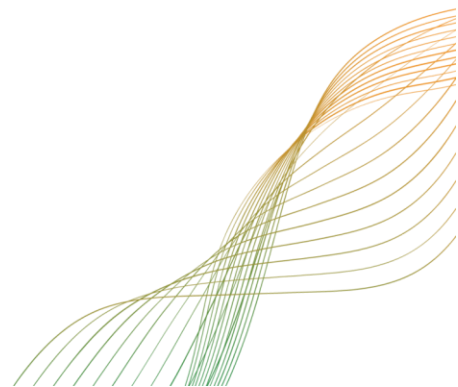
If the data subject has given consent to processing for a specific purpose, they always have the right to withdraw it at any time without affecting the lawfulness of the processing based on the consent given prior to withdrawal.

Please also note that the data subject always has the right to lodge a complaint with the Data Protection Authority to exercise their rights or for any other matter relating to the processing of their personal data.

CFP Associati s.r.l.

Sede legale: Via G. Boccaccio, 15 20123 Milano (MI)
Sede operativa: Via E. Oldofredi, 41 20124 Milano (MI)
Codice Fiscale e Partita IVA: IT12144410961
Iscrizione RUI: B000701844
SDI: T9K4ZHO

e-mail: info@cfp-associati.com
pec: cfpassociatisrl@legalmail.it
Tel. + 39 02 91550498
cell: + 39 3932706785
www.cfp-associati.com



CONSENT FORM FOR THE PROCESSING OF PERSONAL DATA

(Pursuant to Articles 6, 7, 9, and 13-14 of the GDPR 679/2016)

I, the undersigned _____

declare that I have received, read, and understood the privacy notice regarding the processing of personal data provided by **CFP Associati S.r.l.** in accordance with the GDPR.

1. Processing of general and sensitive personal data – Mandatory purposes (point 1 of the notice)

(management of the contractual relationship, consulting, insurance brokerage, legal compliance, protection of rights)

☐ **I CONSENT** ☐ **I DO NOT CONSENT**

2. Marketing, information, and commercial promotion – Optional purposes

(sending communications via mail, telephone, email, SMS/MMS, automated systems)

☐ **I CONSENT** ☐ **I DO NOT CONSENT**

3. Disclosure of data to third parties for commercial purposes

(companies in the insurance sector and related sectors)

☐ **I CONSENT** ☐ **I DO NOT CONSENT**

PLACE AND DATE

SIGNATURE

CFP Associati s.r.l.

Sede legale: Via G. Boccaccio, 15 20123 Milano (MI)
Sede operativa: Via E. Oldofredi, 41 20124 Milano (MI)
Codice Fiscale e Partita IVA: IT12144410961
Iscrizione RUI: B000701844
SDI: T9K4ZHO

e-mail: info@cfp-associati.com
pec: cfpassociatisrl@legalmail.it
Tel. + 39 02 91550498
cell: + 39 3932706785
www.cfp-associati.com



CFP
Associati

Insurance Broker

CFP Associati s.r.l.

Sede legale: Via G. Boccaccio, 15 20123 Milano (MI)
Sede operativa: Via E. Oldofredi, 41 20124 Milano (MI)
Codice Fiscale e Partita IVA: IT12144410961
Iscrizione RUI: B000701844
SDI: T9K4ZHO

e-mail: info@cfp-associati.com
pec: cfpassociatisrl@legalmail.it
Tel. + 39 02 91550498
cell: + 39 3932706785
www.cfp-associati.com

