

Privacy Policy

W EXECUTIVE UK website

WHO WE ARE

DATA CONTROLLER (the “Company” or the “Controller”)	W EXECUTIVE UK LIMITED (W Executive) Company Number: 15207872 Registered office: Mappin House, 4 Winsley Street, London, United Kingdom, W1W 8HF e-mail: privacy@wexecutive.uk EU LEGAL REPRESENTATIVE under art. 27 GDPR: W EXECUTIVE SRL Registered Office: Email: privacy@wexecutive.it
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Our website may contain links to other websites or online services of other organisations. This privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

WHAT DATA WE USE, WHY AND HOW LONG WE HOLD IT FOR

1. Browsing data

The information systems and software procedures relied upon to operate this website acquire some personal data as part of their standard functionalities whose transmission is implicit in the use of Internet communication protocols, such as IP addresses or domain names of users' computers, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment. These data is necessary to operate web-based services in a secure and stable manner. It will be deleted immediately after processing or at the latest within seven days.

The legal basis of the processing (the legal requirement) to operate our website, is our legitimate interest to promote our organization and its activities.

2. Data communicated by you when you contact us: if you send an e-mail message to the address indicated on the website or if you fill in the form "*Contact us*" we will process your data (name, last name, e-mail address, message content, type of request, phone number) to reply to your requests.

The legal basis for the processing is the necessity to perform the contract or to take steps at the request of the data subject prior to entering into a contract.

The data will be held for the time necessary to reply to your request and, in any case, for a maximum of six months.

3. Data we use when we must comply with legal obligations or defend our right: if necessary, your data could be processed to fulfill a legal obligation. The legal basis of the processing is the necessity to comply with a legal obligation to which the controller is subject.

Sometimes we may also need to use your data to defend or establish our rights.

The legal basis of the processing is our legitimate interest in defending our rights.

In these cases, the data will be held for the time required by law or authority or for the time necessary to enforce or defend our right.

4. Data we use to send you promotional communications: we will process your data (email address) to send you promotional communications about services, events or initiatives of WExecutive UK or of our partners.

The data will be held for 24 months, unless you decide to withdraw your consent before.

For this processing (marketing purposes) we rely on your consent.

SHOULD YOU PROVIDE US WITH YOUR DATA?

As mentioned, browsing data is automatically acquired upon access.

On the other hand, you are not obliged to communicate with Us. It's all optional. However, if you want to receive an answer to your questions, you will need to provide us with the data indicated above. Consent for marketing purposes is always optional. If you refuse, you will not be informed about our services, events, initiatives.

WHO WE COMMUNICATE YOUR DATA TO

We can communicate the data to our service providers or other group companies which carry out some services on our behalf (such as software and hardware providers, website providers, and other IT services providers) as data processors in accordance with a data processing agreement.

We can communicate the data to other public or private bodies whenever we are obliged to do so, in response to orders or requests from a court, regulators, government agencies or public authorities, or to comply with other law or regulatory requirements.

TRANSFER OF DATA

We are based in UK, and we rely on an IT infrastructure located in the European Union. However, some of our suppliers (*IT services*) when provide some services can operate outside of the European Economic Area ("EEA") and Switzerland, such as in the US, and have access to the data from outside the EEA.

In these cases, data is transferred only in the presence of the safeguards indicated in the applicable data protection legislation. In particular, the transfer will take place:

- to destination countries for which the UK Government and the European Commission have issued an adequacy decision (art. 45 GDPR and UK GDPR) or
- on the basis of the International Data Transfer Addendum to the EU Commission Standard contractual clauses ("SCCs") (art. 46 GDPR and UK GDPR), provided that supplementary security measures are also in place.

For further information about the data transfers, you can contact our DPO at privacy@wexecutive.uk.

YOUR RIGHTS

You have certain rights in connection with the data processing.

You have the right to access your data and to modify or correct your data.

You can obtain the erasure of personal data and the restriction of the processing when certain conditions are met.

You have the right to receive a copy of your personal data in a structured, commonly used and machine-readable format or ask Us to transmit that data to another controller, where technically feasible, if the processing is based on consent or on a contract and is carried out by automated means.

You have the right to withdraw the consent you have given at any time, without affecting the lawfulness of the processing carried out before the withdrawal.

You can always object to the processing of your personal data for direct marketing purposes and, on grounds relating to your particular situation, you can also **object** to the processing of your personal data based on the legitimate interest of the controller.

If you wish to exercise one of these rights, you can contact our DPO at privacy@wexecutive.fr.

You can lodge a complaint with the data protection authority of your country if you believe that your rights have been breached. For the UK you can contact the Information Commissioner's Office at <https://ico.org.uk>.