

INFORMATION RELATING TO THE PROCESSING OF PERSONAL DATA OF CLIENTS

(in accordance with Article 13 of Regulation (EU) 2016/679 of 27/04/2016)

Dear Client,

Pursuant to Article 13 of Regulation (EU) 2016/679 of 27/04/2016, hereinafter referred to as the “**GDPR**” (General Data Protection Regulation), the company GWA Investments LTD, as **Data Controller**, and in relation to personal data relating to you (hereinafter referred to as the “**Data**”), informs you as follows:

1. Purpose of processing

The collection and processing of Data relating to the Data Subject is carried out in order to allow this Company to carry out the following activities:

- a. operational, administrative and accounting management of the contracts relating to the provision of the services requested, which are the subject of the contracts themselves, and of all the operations connected with them; management of invoices and payments; management of any disputes (including debt collection); fulfilment of the operations imposed by regulatory obligations; assumption of the information necessary for fulfilment, before the conclusion of the contract, of specific requests by the data subject;
- b. assumption of pre-contractual information not activated at the request of the data subject; provision of references during the pre-contractual information phase with possible clients; sending of promotional material of the Company; statistical analysis and other marketing purposes;
- c. comply with legal and regulatory obligations to which the Company is subject

2. Compulsory or optional nature of data provision and consequences of any refusal to provide personal data

The provision of Data to our Company is mandatory only for Data for which there is a legal or contractual obligation to do so.

Any refusal to provide Data that must be provided under a regulatory or contractual obligation may cause problems, thereby forcing the Company either to obtain the data from third sources (where lawfully possible) or to apply to the applicable data protection authority for the processing of personal data or not to execute the contract or request that would result in unlawful processing and this with all damage to the Data Subject.

Any refusal to provide data strictly functional to the execution of contractual relationships, for which there is no obligation to provide, does not have any consequences for you in relation to the contracts in progress, except for the impossibility of following up the operations related to such data. Any needs related to the establishment of new contracts with you will be communicated from time to time, to allow you to freely choose whether or not to provide the Data requested by us.

Any refusal to provide Data relating to the performance of further activities may prevent the performance of such further activities but does not interfere with the performance of the current contractual relationship.

3. Data processing methods

The processing of data, represented by any operation or set of operations among those indicated in Article 4, point 2) of the GDPR, will take place in both automated and non-automated ways, in compliance with the rules of confidentiality and security provided for by regulatory provisions and/or internal regulations, compatible with the purposes for which they were collected, at each stage of processing. In particular, the data will be processed through their comparison, classification, and calculation, as well as through the production of lists.

The Data referred to the Data Subject is collected exclusively from the Data Subject.

4. Communication and dissemination

The Data or part of it may be communicated to the following persons or entities that, for this purpose, may perform processing operations or perform on behalf of the Company services necessary or functional to the performance of the activities referred to in paragraph 1) letters a and b, such as transport, shipping, delivery, banking or insurance operations or postal or consulting or similar: employees of the Company who are not specifically appointed as data handlers; Public Bodies, Authorities or Institutions; Banks and Credit Institutions, independent contractors, professionals (lawyers, accountants), consultants of the Company; auxiliaries, counterparties and suppliers in the performance of the tasks assigned by you; other offices of this Company or other companies, including foreign companies, investees, associates or subsidiaries, or with which a business or correspondence relationship is maintained; insurance companies (their agents and brokers); auditing firms; as well as to anyone who is the legitimate recipient of communications provided for by law or regulations. Certain categories of persons who, for reasons related to their duties, functions or profession held at the Company, carry out activities instrumental to the provision of the services envisaged by the contractual relationship covered by this disclosure may also become aware of the Data processed, in their capacity as Data processors (if appointed) or Data handlers.

5. Data transfer

Personal Data may be communicated to the subjects indicated in the previous point (Communication and dissemination), even if this involves the transfer of such data to other European Union countries or third countries, exclusively where they are required for processing related to the performance of the task received as reported to the purposes of processing.

6. Rights of the data subject

Article 15 of the GDPR grants the data subject the following rights:

1. A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him/her exists, regardless of whether or not it has been registered and to communication of such data in intelligible form.
2. A data subject shall have the right to be informed:
 - a. of the source of the personal data;
 - b. of the purposes and methods of the processing;
 - c. of the logic applied to the processing, if carried out with the help of electronic means;
 - d. of the data controller's identification details;
 - e. of the subjects or categories of subjects to whom the personal data may be communicated;
3. A data subject shall have the right to obtain:
 - a. updates and amendments of, and where applicable, supplements to the data;
 - b. erasure, anonymisation or blocking of the data that has been processed unlawfully, including data whose retention is unnecessary for the purposes for which it has been collected or subsequently processed;
 - c. proof that the above operations under a) and b) have been brought to the attention, including with regard to their content, of parties to which the data had been communicated or disseminated, except in cases where this is impossible or would entail a use of resources clearly disproportionate to the right being safeguarded.
4. The data subject has the right to object entirely or partially: a) on legitimate grounds, to the processing of personal data concerning him/herself, even if relevant to the purpose of the collection; b) to the processing of his/her personal data where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys, by means of the use of automated calling systems without the intervention of an operator by e-mail and/or using traditional marketing methods by telephone and/or post. Please note that the right of the data subject to object to processing, as described under point b) above, for direct marketing purposes involving automated means, shall also extend to include traditional means. This is in any case without prejudice to the option of the data subject to exercise his right to object only partially. Therefore, the data subject may decide to receive only communications made using traditional means or only automated communications or neither type of communication. Where applicable, he/she shall also have the rights pursuant to Articles 16-21 of the GDPR (Right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object) and the right to complain to the Data Protection Authority.

In order to exercise the rights under Article 15 of the GDPR or for questions or information regarding the processing of your data and the security measures adopted, you may in any case forward your request to the following address:

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Phone: +356 21 381 434
E-mail: info@gwainvestments.com

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