

PRIVACY POLICY

Last updated October 2025

This Privacy Policy explains how we handle your personal information when you engage and collaborate with us to provide your professional services to us and to our clients ("**Services**").

1. PURPOSE OF THIS POLICY

This Privacy Policy ("**Privacy Policy**") explains our approach to any personal information that you have provided to us or which we have obtained about you from a third party and the purposes for which we process your personal information. It also sets out your rights in respect of our processing of your personal information.

This Privacy Policy will inform you of the nature of your personal information that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

This Privacy Policy is intended to assist you in making informed decisions when engaging with us to understand how your personal information may be processed by us as a result of your engagement and collaboration with us. Please take a moment to read and understand it.

Please also note that this Privacy Policy only applies to the use of your personal information obtained by us.

2. WHO ARE WE AND WHAT DO WE DO

DLA Piper is a global law firm operating through a number of separately constituted and regulated legal entities which provide legal and other client services in accordance with the relevant laws of the jurisdictions in which they respectively operate. Details of the different DLA Piper entities that provide legal services or other services to clients can be found [here](#). Please note that depending on which DLA Piper entity you engage or collaborate with to provide the Services, the following entities may also be data controllers responsible for processing your personal information in relation to the Services, see [here](#).

3. HOW TO CONTACT US

It is anticipated that for present purposes, DLA Piper Italia Società Tra Avvocati S.r.l., registered office in Via della Posta 7, 20123 Milano, will be the primary data controller of your personal information provided to us and handled by us in relation to the Services. DLA Piper Italia Società Tra Avvocati S.r.l., appointed a Data Protection Officer who can be contacted in relation to any aspect explained in this Privacy Policy via the email address indicated below. If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by sending an email to: privacyitaly@dlapiper.com.

4. WHAT PERSONAL INFORMATION DO WE COLLECT

In the context of managing the Services and the ordinary course of our business, we may collect and use certain of your personal information, including:

- a) identification data, such as your name, surname, professional title, date of birth, tax code and VAT number;
- b) your contact details, such as address, place of business, telephone number and e-mail address;
- c) your areas of activity, professional skills and expertise, language skills, qualifications and official registrations (e.g. with professional bodies or local Bars);
- d) information on your previous dealings with DLA Piper such as previous collaborations and payment methods;
- e) further information on your career, credentials, references, and/or information from your curriculum vitae and application form, and any supplementary information that are provided by you;
- f) location applied for, contact status, professional attributes, engagement model, pay rate, job title, assignment details and your availability (dates) to provide Services;
- g) details of any existing insurance policy, if necessary for the purpose of the Services,
- h) to the extent required by anti-money laundering legislation, the information and documents necessary to carry out the checks required under that legislation; and/or
- i) any reviews, feedback or commentary in relation to your participation or performance in the Services.

5. HOW DO WE USE YOUR PERSONAL INFORMATION

We may use your information for the following purposes:

- a) allow you to register with us in order to be onboarded and contacted by us for possible Service assignments;
- b) assess your professional profile with reference to your areas of competence, skills and credentials, in order to verify your suitability for the Services; and

- c) generally to perform our obligations in accordance with any contract that we may have with you, (the above-mentioned purposes are jointly referred to as the '**Contractual Purposes**');
- d) to fulfil any legal or regulatory obligations (hereinafter, the '**Legal Purposes**');
- e) to disclose your personal information to certain third parties as required in relation to the Services, including to our clients, and to allow clients to review and assess your professional profile and credentials to verify and confirm your suitability for the Services;
- f) to assert and defend our rights against you or third parties in any litigation;
- g) to complete a potential merger, demerger, sale of assets, transfer of business or business unit by transferring your personal information to the third party(ies) involved; and
- h) to assess your performance of the Services,

(the purposes referred to in points (e) to (h) are jointly referred to as the '**Legitimate Interests Purposes**').

6. WHAT IS OUR LEGAL BASIS TO USE OR PROCESS YOUR PERSONAL INFORMATION

The Processing of Your Personal Data is necessary to perform the Contractual Purposes and the Legal Purposes and specifically to: (i) allow Your registration with DLA Piper so You may be identified and contacted by DLA Piper in relation to Services; (ii) assess and verify Your details, knowledge, technical skills, competence and credentials as necessary in relation to Services; and (iii) allow DLA Piper to comply with any legal or regulatory obligations. Therefore, if You do not want Your Personal Data to be Processed for such purposes, DLA Piper would not be able to register and assess Your profile and, consequently, to select You for Services.

The Processing of Your Personal Data for Legitimate Interests Purposes is carried out in the pursuit of DLA Piper's legitimate interests in the context of its business and offering professional legal advisory services to clients, which are fairly balanced with Your interests, rights and freedoms. The Processing of Your Personal Data is limited to what is strictly necessary for the performance of the operations and activities indicated in paragraph 5 above.

Processing for Legitimate Interests Purposes is not compulsory, and You may object to such Processing in the manner set out in paragraph 11 below. However, should You object to such Processing, this shall be without prejudice to DLA Piper's rights to continue Processing the Personal Data for its Legitimate Interests Purposes to the extent permitted by, and in accordance with, data protection legislation.

7. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH

DLA Piper is a global law firm and any information that we collect or that you provide to us may be shared and processed by any DLA Piper entity and by their personnel within the scope of their respective duties and within the limits established by law. You can find out more about the DLA Piper entities and locations [here](#). We may also share your personal information with a variety of the following categories of third parties as necessary:

- a) our clients, for the purposes set out in paragraph 5(e) of this Privacy Policy – in this case clients shall act as independent data controllers of your personal data ;
- b) providers of professional and support services to DLA Piper, in the ordinary course of, and to support, the Services and DLA Piper's business operations (including without limitation to finance, payroll, administration and IT services providers, consultants, accountants and auditing companies) in their respective capacities as data processors or as independent data controllers of your personal data as appropriate;
- c) public bodies and/or judicial and/or supervisory authorities whose right of access to your personal information is provided for by the applicable legislation, in their capacity as independent data controllers of your personal data; and
- d) DLA Piper's affiliates and associated entities, as independent data controllers.

Please note that where your personal data are processed by the third parties referred to above acting as independent data controllers, these third parties shall be responsible for providing the necessary information to you regarding their processing of your personal data in accordance with the requirements of data protection legislation.

8. WHERE DO WE TRANSFER YOUR DATA TO

In connection with the Services we may need to transfer your personal information to locations outside the jurisdiction in which you provide it.

If you are based within the European Economic Area (EEA) or the United Kingdom, please note that where necessary in relation to the Services we will transfer personal information to countries outside the EEA or the United Kingdom (including to DLA Piper LLP (US) and other DLA Piper entities). Any such transfers will be conducted in accordance with the applicable data protection legislation.

All the DLA Piper entities have signed a data sharing agreement which is based on the EU standard contractual clauses to ensure we will comply with our legal and regulatory obligations in relation to personal information, including having a lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

9. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR

Your personal information will be kept by us for the period of time necessary for the purposes for which the information was collected by us, as set out in this Privacy Policy.

Where you are confirmed as successfully registered with us to provide the Services we may retain your data for at least 10 years from the date of your last interaction with us in compliance with DLA Piper's obligations under data protection legislation, or for such longer period as is required to satisfy DLA Piper's record keeping, legal, regulatory and/or professional indemnity insurance obligations.

Where we confirm that your application to register with us to provide the Services has not been successful, we will temporarily retain your data for 6 months for our internal record keeping purposes.

In relation to your profile data, these will be updated when you notify DLA Piper of a change in your profile data.

Please note that where you are successfully registered with us to provide the Services, but you are not engaged by us to provide any Services over a period of 12 months from our last interaction with you, we will contact you to check whether you want to continue being registered with us. If you then confirm that you do not wish to continue being registered with us, or if we do not receive your confirmation within the specified response time, we will then remove your details from our systems, with the exception of those data that we are required to keep for our internal record keeping purposes, or to satisfy our legal, regulatory and/or professional indemnity insurance obligations.

At the end of the relevant retention period, your personal information will be deleted or anonymised.

10. CONFIDENTIALITY AND THE SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information provided to us secure and we have implemented appropriate information security policies, rules and technical measures to protect the personal information that we have under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. All of our partners, employees, consultants, workers and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of such personal information.

11. HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS

You have the following rights in relation to the personal information we hold about you, and you can exercise any of these rights at any time and free of charge, by sending an email to privacyitaly@dlapiper.com:

- **Your right of access**

If you ask us, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

- **Your right to rectification**

If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- **Your right to erasure**

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- **Your right to restrict processing**

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- **Your right to data portability**

You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

- **Your right to object**

You can ask us to stop processing your personal information, and we will do so, if we are:

relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
processing your personal information for direct marketing purposes.

- **Your right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

- **Your right to lodge a complaint with the supervisory authority**

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the relevant Supervisory Authority.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure due to reasons of legal professional privilege or professional secrecy obligations.

12. CHANGES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy from time to time. To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. Where it is practicable, we will notify you by email of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.