

## **Privacy Policy – European Clients (GDPR Compliant)**

This Privacy Policy is issued by LTD Consulting SRLS (hereinafter referred to as the “Company”), in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018. It applies to the processing of personal data of clients, users, and contacts within the European Economic Area (EEA).

### **Article 1 – Data Controller**

The Data Controller is LTD Consulting SRLS, with registered office at Viale Antonio Ciamarra 259, 00173, Rome, Italy, email [info@ltdconsulting.io](mailto:info@ltdconsulting.io), and website <https://ltdconsulting.io/>.

### **Article 2 – Categories of Data Collected**

The Company may collect and process the following categories of data:

- Identification and contact details (name, surname, email address, phone number).
- Payment and billing data (transaction details, PSP identifiers, invoicing information).
- Technical data (IP address, access logs, browser type, usage data).
- Communications data (emails, messages, and attachments exchanged with the Company).

### **Article 3 – Purpose and Legal Basis of Processing**

Personal data are collected and processed for the following purposes:

1. To provide consulting and professional services to clients (performance of a contract – Art. 6(1)(b) GDPR).
2. To comply with legal and fiscal obligations (Art. 6(1)(c) GDPR).
3. To manage payments, invoicing, and administrative communications (legitimate interest – Art. 6(1)(f) GDPR).
4. To respond to inquiries and provide pre-contractual information (Art. 6(1)(b) GDPR).
5. To improve service quality and website functionality (consent – Art. 6(1)(a) GDPR).

### **Article 4 – Methods of Processing and Data Retention**

Data are processed electronically and, where necessary, in paper format. The Company implements appropriate technical and organizational security measures to protect data from unauthorized access, alteration, loss, or destruction. Personal data will be retained for as long as necessary to fulfill contractual, legal, and administrative obligations, and in any case not longer than 10 years from the end of the relationship.

### **Article 5 – Recipients and Data Transfers**

Personal data may be shared with authorized personnel, consultants, accountants, IT providers, and payment processors (PSPs) strictly for operational and legal purposes. Data are not transferred outside the European Economic Area unless adequate safeguards under Articles 44–49 GDPR are in place.

## **Article 6 – Rights of Data Subjects**

Under Articles 15–22 GDPR, Clients have the right to:

- Access their personal data;
- Request rectification, erasure, or restriction of processing;
- Object to processing for legitimate reasons;
- Request data portability;
- Withdraw consent at any time without affecting the lawfulness of prior processing.

Requests must be submitted in writing to [info@ltdconsulting.io](mailto:info@ltdconsulting.io).

## **Article 7 – Automated Decision-Making and Profiling**

The Company does not use automated decision-making or profiling systems that produce legal or significant effects on the data subject.

## **Article 8 – Cookies and Tracking Technologies**

The website <https://ltdconsulting.io/> may use technical cookies and, where consent is provided, analytical or third-party cookies. For more details, please refer to the separate Cookie Policy available on the Website.

## **Article 9 – Data Protection Officer (DPO)**

At present, LTD Consulting SRLS has not appointed a Data Protection Officer, as the nature and volume of data processing do not require such designation under Article 37 GDPR. For privacy inquiries, contact [info@ltdconsulting.io](mailto:info@ltdconsulting.io).

## **Article 10 – Supervisory Authority and Complaints**

Data subjects have the right to lodge a complaint with the competent supervisory authority, the 'Garante per la Protezione dei Dati Personali' ([www.garanteprivacy.it](http://www.garanteprivacy.it)), or with any other authority within the EU competent under Article 77 GDPR.

## **Article 11 – International Applicability**

This Privacy Policy applies to all Clients and users located within the European Economic Area, including EU and EFTA countries. For Clients residing outside the EEA, separate terms may apply, consistent with this Policy.

## **Article 12 – Updates to this Policy**

The Company reserves the right to modify this Privacy Policy at any time. Any updates will be published on <https://ltdconsulting.io/> and become effective on the date of publication.

Issued by LTD Consulting SRLS, Viale Antonio Ciamarra 259, 00173, Rome, Italy.