



PRIVACY POLICY

Last Updated: (01 03.2025). **INTRODUCTION** This Privacy Policy describes how Marisa S.r.l., headquartered at Piazza del Duomo 17, Milan (hereinafter, "Company," "we," or "TLWC"), collects, uses, stores, and protects the personal data of users who visit the TLWC website and utilize our exclusive services.

The processing of data is carried out in compliance with Regulation (EU) 2016/679 ("GDPR"), Italian legislation on personal data protection (Legislative Decree 196/2003 and subsequent amendments), and other applicable laws.

2. DATA CONTROLLER

The data controller responsible for processing personal data is:

Marisa S.r.l.

Registered office: Piazza del Duomo 17, Milan

Contact email: tlwc@leadingwomencircle.com

For any inquiries regarding the management and protection of personal data, users can contact us at the above email address.

3. DATA COLLECTED

Depending on the interaction with our website and the services used, we may collect the following categories of personal data:

- Identification data (name, surname, email, phone number, professional role);
- Browsing data (IP address, browser and device information, cookies, site interaction data);
- Voluntarily provided data (e.g., filling out contact forms, email communications, membership requests for the Circle);
- Cookies and tracking technologies (see Cookie Policy for more details);
- Financial data (in case of transactions for premium services or private events, including invoicing and payments).

4. PURPOSES OF PROCESSING AND LEGAL BASIS

We process personal data for the following purposes:

- Managing user requests, including membership applications, event invitations, and service-related communications. (Legal basis: contract execution or pre-contractual measures)
- Website administration and IT security, fraud prevention, and navigation preference management. (Legal basis: legitimate interest)
- Direct marketing and personalized communications, subject to explicit user consent. (Legal basis: consent)
- Compliance with legal obligations, including tax, accounting requirements, and responses to authorities. (Legal basis: legal obligation)

5. DATA RETENTION PERIOD

Personal data is retained for the time strictly necessary for the purposes for which it was collected and in accordance with applicable legal provisions:

- Identification data: retained for up to 36 months from the last interaction with TLWC services.
- Browsing data: retained for up to 12 months.
- Financial data: retained for 10 years in compliance with tax regulations.
- Marketing data: retained until consent is withdrawn.



6. DATA SHARING Personal data will not be sold to third parties, except in the following cases:

- IT and hosting service providers, for technical management of the website;
- Exclusive Circle partners, with explicit user authorization;
- Public authorities, in case of legal requests or judicial proceedings.

7. USER RIGHTS Users have the right to:

- Access their personal data and obtain a copy of it;
- Request correction of inaccurate data or completion of incomplete data;
- Request deletion of personal data within legal limits;
- Restrict data processing under certain circumstances;
- Object to processing for legitimate reasons;
- Withdraw consent at any time for consent-based processing;
- Request data portability to another controller.

Requests can be sent to tlwc@leadingwomencircle.com.

8. SECURITY MEASURES We implement technical and organizational measures to protect personal data from unauthorized access, loss, alteration, or disclosure.

9. CHANGES TO THE PRIVACY POLICY We reserve the right to update this Privacy Policy periodically. Users will be informed of significant changes through notifications on the website.