

Dates	24/06/2022→ today					
Occupation or position held	Privacy Manager					
Main activities and responsibilities  Reporting directly to the Director of Legal Affairs of the Region Italy, I am responsible for the "Privacy GDPR Compliance" function for Comdata Spa and its Italian subsidiaries.						
Name and address of employer	Comdata S.p.A. (Konecta Group) Via Caboto 1 Corsico – (MI) - (Italia)					
Dates	26/07/2021 <del>→</del> 01/08/2022					
Occupation or position held	Member of the Group Compliance Committee					
	Group Compliance Committee is responsible for verifying that internal procedures are consistent with preventing the violation of our regulatory (laws and regulations) and self-regulatory requirements (codes of conduct, ethical principles). This will eliminate the risk of "incurring penalties, financial I osses or reputational damage as a result of violations of I egislative rules, regulatory or self-regulatory".					
Name and address of employer	Comdata S.p.A. Via Caboto 1 Corsico – (MI) - (Italia)					
Dates	01/01/2020→ 23/06/2022					
Occupation or position held	Privacy Manager					

Main activities and responsibilities	Reporting directly to the Group Chief Legal Officer, I am responsible for the "Privacy & GDPR Compliance" function for the Group's Italian companies.  I coordinate the privacy compliance for the Italian branches of the Group.  I manage and update the corporate accountability system for GDPR and data protection.  I coordinate internal projects to support the business that impact on privacy compliance, in order to ensure the achievement of business objectives in compliance with the applicable regulatory framework.  I work daily with the external DPO and the CISO.  I support the external DPO for supervisory activities on processing, data subject requests and data breaches.  I keep and maintain the "Record of Processing Activities" as Data Controller and Data Processor.  I draft Data Protection Agreements with customers and suppliers.  I draft DPIAs for new projects/activities.  I design e-learning courses on GDPR for specific groups of the company population.  I participate, as audited function, in privacy & security audits of corporate clients on compliance with contracted DPAs.					
Name and address of employer	Comdata S.p.A. Via Caboto 1 Corsico – (MI) - (Italia)					
Type of business or sector	Multinational group operating in the business services sector (call centres and contact centres) in the areas of customer care, back office process management, credit management, digital services and technology solutions.					
Dates	01/10/2018 → 31/12/2019					
Occupation or position held	DPO Assistant					
Main activities and responsibilities  Name and address of employer	Member of the DPO Committee with the task of supporting the Comdata Spa DPO in carrying out the tasks and functions assigned to it, namely:  • inform and advise the Company on the obligations deriving from the GDPR, as well as other national or European Union provisions relating to data protection; among other things, collect information to identify the treatments carried out, analyze and verify the treatments in terms of their compliance, provide guidelines of behavior;  • monitor compliance with the GDPR, other national or European Union provisions relating to data protection as well as the Company / Group policies regarding the protection of personal data, including the attribution of responsibilities, awareness and training of the staff participating in the treatments and related control activities;  • provide, if required, its opinion on the impact assessment on data protection and monitor its progress, pursuant to article 35 of the GDPR;  • to assess, for the purpose of adopting corrective measures and defining intervention priorities, the risks inherent in the treatments carried out by the Company, taking into account the nature, scope, context and purposes of the same treatments;  • keep and keep up to date the register of processing activities carried out by the Company, where this / these are held there pursuant to art. 30 of the GDPR;  • provide adequate feedback to data subjects who contact him for questions relating to the processing of his personal data or for the exercise of his rights pursuant to the GDPR;  • act as a contact point with the Guarantor for the protection of personal data ("Guarantor") for questions related to the processing, including the prior consultation referred to in Article 36 of the GDPR, as well as cooperate with the Guarantor and, if necessary, consult it;  • draw up an annual report on their work, to be submitted to the Director / Board of Directors of the Company by the end of May of each year, indicating any intervention priorities.					
Name and address of employer	Via Caboto 1 Corsico – (MI) - (Italia)					
Type of business or sector	Multinational group operating in the business services sector (call centres and contact centres) in the areas of customer care, back office process management, credit management, digital services and technology solutions.					
Dates	01/04/2015 → 30/09/2018					
Occupation or position held	Privacy Manager					
Main activities and responsibilities	Reporting directly to the Legal and Corporate Affairs Department, with the following responsibilities: - ensuring compliance and general governance of aspects relating to the processing of personal data in accordance with legal requirements (Privacy Code - Legislative Decree 196/2003 and Provisions of the Supervisory Authority) - drafting internal documents (appointments, disclosures, etc.) necessary for the correct implementation of					

	legal requirements inherent in company processes, external documents (client check lists, requests from the Supervisory Authority, etc.) on privacy aspects and issuing company guidelines on data protection - coordinating preparatory activities for audits of clients of BPO services on the correct handling of personal data managed for existing contracts and supporting the corporate areas involved in the audit phase; - drafting and reviewing the privacy rules and annexes (e.g. appointments of officers, assessment checklists, etc.) contained in contracts with service procurers and suppliers - managing privacy requests made by internal departments - defining the content and methods of providing training on the subject - coordinating and carrying out Auditing and Control activities on compliance with corporate Governance on the subject of Privacy.						
Name and address of employer	Comdata S.p.A. Via Caboto 1 Corsico – (MI) - (Italia)						
Type of business or sector	Multinational group operating in the business services sector (call centres and contact centres) in the areas of customer care, back office process management, credit management, digital services and technology solutions.						
Dates	01/03/2008 <del>→</del> 31/03/2015						
Occupation or position held	Privacy Manager						
Main activities and responsibilities	Reporting directly to the HR Department, with the following responsibilities:  - ensuring the respect, compliance and general governance of aspects relating to the processing of personal data in accordance with company policies and legal provisions  - defining the content, updating and delivery methods of privacy training  - issue guidelines and procedures on the protection of personal data in compliance with regulatory requirements and/or the provisions of the Privacy Authority  - coordinating privacy-related activities and drafting the documents (appointments, notices, etc.) required for the proper implementation of legal obligations relating to internal and external corporate processes  - drafting and updating, in cooperation with the other functions involved, the Data Protection Document (former DPS)  - coordinating and carrying out auditing and control activities on compliance with corporate governance in the field of privacy and on the data protection requirements contracted with service purchasers  - carrying out internal audits in support of the Internal Audit function						
Name and address of employer	Comdata S.p.A. Via Kuliscioff, 33 Milano (Italia)						
Type of business or sector	Multinational group of companies providing services in the IT technology sector and BPO services for document outsourcing and inbound/outbound telephone services						
Dates	20/09/2003 →28/02/2008						
Occupation or position held	Quality and Privacy Specialist						
Main activities and responsibilities	Reporting directly to the HR Department, with the following responsibilities  - implementation of Comdata S.p.A.'s Quality Management System according to ISO 9001:2000 and ISO 9001 2008 and conducting internal process audits  - drafting and updating DPS (Data Security Policy Document) of Comdata Group companies pursuant to Legislative Decree 196/2003 (Privacy Code)  - coordination and support to the structures in charge of updating the DPS of other Comdata Group companies  - periodic assessment of the application of the minimum security measures relating to the processing of personal data of Comdata S.p.A. and/or service customers  - preparation of material and provision of privacy training courses for internal managers and persons in charge of personal data processing  - drafting of statutory appointments and information required by the Privacy Code  - support to internal functions for the verification of privacy obligations  - coordination of activities to comply with the provision of the Privacy Guarantor of 27 November 2008 on "Measures and measures for system administrator functions".  - coordination of an internal team for compliance with the ISO/IEC 27001:2005 Information Security Management Systems standard						
Name and address of employer	Comdata S.p.A. Via Kuliscioff, 33 Milano (Italia)						

Type of business or sector	Multinational group of companies providing services in the IT technology sector and BPO services for document outsourcing and inbound/outbound telephone services					
Dates	17/06/2002 →16/03/2003					
Occupation or position held	Quality Specialist					
Main activities and responsibilities	In cooperation with the Quality Manager and the Operations Manager, with the following responsibilities - implementation and enforcement of the Quality Management System - coordination and support of external third party consultants during annual internal audits - drafting of Operating Manuals and definition of operating flows - training for operators during the start-up of new services - support to the design area for the drafting of user requirement documents and for the identification of service specifications.					
Name and address of employer	In Touch S.r.l. (Europ Assistance Group)					
Type of business or sector	Insurance					
Dates	15/09/2000 →16/06/2002					
Occupation or position held	Internships and Consulting					
Main activities and responsibilities	<ul> <li>InTouch S.r.I., Europ Assistance Group, Milan office, from 14 January 2002 to 14 June 2002. Activities: analysis of processes, drafting of procedures and documentation relating to the quality management system, assisting external third-party auditors in carrying out internal audits as required by the ISO 9001:2000 standard, implementation and enforcement of the Quality Management System</li> <li>from 9 October 2001 to 22 December 2001, at Modus Consulting S.r.I. of Milan, an information technology company, for the implementation of an American software for the management of the Quality System (QSI 9000): translation and testing of the software for the Italian market.</li> <li>at the Quality Department of the Siemens S.p.A., Pisa plant, from 27 September 2000 to 22 March 2001. Company internship: internal and external customer satisfaction in the context of ISO/TS 16949 certification and implementation of the EFQM model.</li> </ul>					
Name and address of employer	In Touch S.r.I. (Europ Assistance Group); Modus Consulting S.r.I.; Siemens S.p.A					
Type of business or sector						
Education and training						
Dates Title of qualification awarded Name and type of organisation providing education and training	01/09/1993 - 11/12/2000  Degree in Economics  University of Pisa - 110/110 summa cum laude					
Date	01/11/1988					
Title of qualification awarded	Scientific Lyceum					
Dates	Dal 10/2020 al 07/2021					
Title of qualification awarded	Master of Personal Data Protection & Data Protection Designer  ID Credenziale: Maestro 00398 ( <a href="https://www.istitutoitalianoprivacy.it/albo-maestri-iip/">https://www.istitutoitalianoprivacy.it/albo-maestri-iip/</a> )					
Principal subjects/occupational skills covered Name and type of organisation providing education and training	Master of Personal Data Protection & Data Protection Designer  Academy Istituto Italiano Privacy					
Dates 03/2019 and 06/2019						
Title of qualification awarded	Masterclass Privacy					
Principal subjects/occupational skills covered Name and type of organisation	Compliance and Documentation and Organisation and Contracts  AFGE					
providing education and						

training

Date 06/2018

Title of qualification awarded Masterclass Privacy Principal subjects/occupational **GDPR** Compliance

skills covered

Name and type of organisation **AFGE** 

providing education and

training

Date 03/2017

Title of qualification awarded Conference

Principal subjects/occupational Privacy and Data Processing

skills covered

Name and type of organisation providing education and

training

Paradigma Spa

Date 10/2016

Title of qualification awarded Conference

Principal subjects/occupational Privacy & Information Security Forum - New EU Regulation/2016/679

skills covered

10/2015 Date

Title of qualification awarded Workshop

Principal subjects/occupational Corporate Privacy Compliance Forum

skills covered

Name and type of organisation **AFGE** 

providing education and

training

Date 03/2015

Title of qualification awarded Workshop

Principal subjects/occupational Privacy and Control of Workers

skills covered

Name and type of organisation **AFGE** 

providing education and

training

Date 01/2014

Master TUV - Privacy Officer Title of qualification awarded

Principal subjects/occupational

skills covered

training

**Privacy Officer** 

Name and type of organisation providing education and

TUV - Feder Privacy

Personal skills and competences Proactivity and autonomy in organising one's own work

Ability to analyse and pay attention to detail

Overall vision Team working

Flexibility and problem solving

Ability to work in complex and dynamic environments

Strong interest in new technologies

Mother tongue(s)

Italian

Other language(s)

**English** 

Self-assessment European level (\*)

Understanding		Spea	Writing		
Listening	Reading	Spoken interaction	Spoken production		

B2	Upper intermediate level								
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(\*)Common European Framework of Reference for Languages

Doniela Gronata