

THE RED SYNERGY
empowering
SOLUTIONS

RED SYNERGY PROVIDES ASSISTANCE ON DATA PROTECTION AND DATA MANAGEMENT

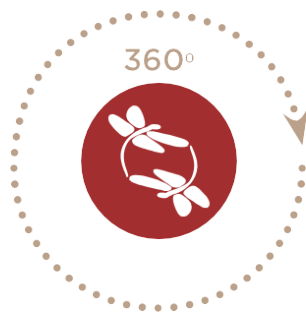
Red Synergy is uniquely positioned to guide clients:

Personal information is an increasingly valuable business asset. As businesses struggle to keep up with technology advancements and fast-changing data protection laws, we assist clients with both with regulations and technology.

We combine privacy regulations knowledge with an understanding of how businesses, products and services operate. We focus on how data is produced and transferred. We look into the business models and understand how data flows. Finally, we consider both hardware and software with particular focus on AI, machine learning and algorithms to ensure privacy compliance and proper data management.

WE CREATE SIMPLE SOLUTIONS FOR E-COMMERCE, IOT AND AI BUSINESSES

We innovate by:



- Giving a 360° overview of all the privacy aspects involved in a project
- Looking at the regulations, the business model and the technology
- Assisting on multiple jurisdictions

OUR CORE SERVICES

Whether you need to roll out a global privacy program or launch a new IOT device, we can assist you with the following services:

| | |
|--------------------|---------------------------------|
| Privacy Set Up | Data Governance and Privacy |
| Product Set Up | Internet of Things (IOT) and AI |
| Ongoing Assistance | Corporate and Commercial |

DATA GOVERNANCE and PRIVACY

We are able to advise on data processing operations, with reference to every sector and industry, including e-commerce, manufacturing, and digital marketing.

In particular, we provide the following services:

- drafting of custom **privacy policies** (GDPR, CCPA and China PIPL compliance) for website and/or mobile app
- creation of **privacy practices** tailored to your business model
- build and roll out of **data access policies, data protection impact assessment (DPIA), data audit**, retention policies, and **incident policies**
- perform **Gap Analysis**

INTERNET OF THINGS and ARTIFICIAL INTELLIGENCE

We support manufacturing and technology companies both from Europe and Asia, often from the start-up phase, in the launch and integration of the most advanced innovations in the IT field.

In particular, we provide the following services:

- carry on **data protection impact assessment (DPIA)**
- advising on **privacy by design** principles for creating new products or services
- drafting **data transfer agreements (DTA)**
- structuring and advising on data flow for AI/machine learning/deep learning operations to comply with privacy principles

CORPORATE and COMMERCIAL

In the corporate sector, we provide ongoing assistance to small and medium-sized companies, as well as to large national and foreign industrial groups, to start up, plan or strengthen their activities in any market area.

In particular, we provide the following services:

- drafting **operating agreements, articles of association, partnership agreements, shareholder/investor agreements, non-disclosure agreements**
- drafting of **Cloud and SaaS agreements**
- **trademark registration**
- drafting **employment/independent contractor agreements**
- drafting software/mobile app **licensing agreements**

RECENT EXPERIENCES

Chinese hardware platform launching a device collecting data in Europe

A Shenzhen based IOT platform launched a smart device (with AI enabled functions) collecting data in Europe (both personal and device related) and transferring data outside the EU. We have assisted the company in drafting a **data protection impact assessment (DPIA)**, advising on **privacy by design** principles for structuring the data collection in Europe, drafting **data transfer agreements (DTA)**, and creating **privacy policies** and **privacy procedures** to handle data.

Data transfer agreement from China to Europe

A global high-end beauty products retailer needed to transfer data between China and overseas as part of its customer relationship program. The client needed to understand how to comply with the newly introduced China Privacy Law. We advised the client on **how to structure the service**, draft agreements for **data transfer** from China and **comply with the most stringent regulations** for possible future developments.

Privacy Due Diligence for acquisitions

A tech company active in the streaming business and purchasing several tech businesses globally needed to carry on a **data privacy** and **data management due diligence** on target companies located in Austria, Belgium, Switzerland, and USA. Target companies were operating globally and the due diligence involved a multijurisdictional approach on privacy policies. Furthermore, data was transferred between continents without having proper **standard contractual clauses** in place. We prepared a **due diligence report**, drafted the comprehensive **privacy policy** and the **standard contractual clauses** to be implemented by the targets.



MARCO GERVASI

Background

- attorney with a background in business law and technology
- 15+ years' experience in company's establishment, mergers and acquisitions and contracts negotiation both in Europe and in Asia
- specializes in international data protection laws (GDPR, CCPA, China PIPL) and data management
- deep understanding of **data privacy** and **data science**
- works with business startups, Internet platforms and digital businesses in Europe, China and the United States
- clients operate in manufacturing, tech, and fashion
- published author in 3 languages (Chinese, English, Italian): "East-Commerce, A Journey Through China E-Commerce and the Internet of Things" (Hoepli 2015; Wiley 2016; Citic 2016)

- served as director and independent director of corporate boards in China
- regularly contributing to Asian and European magazines (SCMP, Il Sole 24 Ore, Forbes)

Qualifications

- Certified Information Privacy Manager (CIPM), and Certified Information Privacy Professional - Europe (CIPP/E)
- Executive degree in Data Science for Business from Harvard Business School
- Dual degree in Law (LL.B) and Chinese Studies from Milan University, Italy

Testimonials

Internet of Things

"Marco helped us in drafting part of the documentation for our company. He is very good at dealing with the complexity of cross border structures. His advice is very relevant because he tries to understand the business implications before providing recommendations. He looked at things from our company's angle, beyond just the obvious- things that I did not consider myself and that were valuable"

Toby O. | medical device IOT company founder

E-commerce

"Unique, knows how to work across geographies and multiple sectors Marco advised us on the establishment of a non-profit internet platform. Our project was multi-jurisdictional and multi sector (internet, media, sport, agriculture). What he did for us was unique. He has both the corporate knowledge, an international mindset and a deep understanding of how an internet business works. He is great at giving you both the big picture and practical advice on how to bring a complex internet project to life."

Lyman D. | e-commerce platform founder

"Strong legal and e-commerce/digital expertise. Very few can master the legal and digital intersection as Marco does, especially considering how rapidly this space evolves. Marco knows how to structure a digital business and provides strong insights on how to successfully operate it. I highly recommend working with Marco for your legal & digital projects. "

Alex D. | e-commerce platform founder

Contacts

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