

# PRIVACY POLICY

*Pursuant to Article 13 of the EU Regulation 2016/679*

The purpose of this document is to provide information below describes, as required by the EU Regulation 2016/679 (GDPR), with regard to the processing operations performed on the personal data of the users collected from the website.

## 1. DEFINITIONS:

Pursuant to GDPR:

- “Personal data”: means any information relating to an identified or identifiable natural person (“data subject”);
- “Processing”: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

## 2. NATURE AND ORIGIN OF PERSONAL DATA:

A data subject is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Data Controller shall collect only voluntary contents and information provided by the users.

In order to participate to the challenge, we will require the following Personal data: name and surname, email address, and nationality.

## 3. LEGAL BASIS FOR THE PROCESSING:

The personal data mentioned on this page are processed by FONDAZIONE SERENA after the data subject has given consent to the processing of his or her personal data for these specific purposes:

- a) Participation to the Challenge;

Data processing is necessary for admission to the challenge.

The data subject has the right to withdraw his or her consent at any time by contacting the Data Protection Officer. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

## 4. DATA PROCESSING ARRANGEMENTS – TIME-LIMITS FOR STORING THE DATA:

Data will be processed using both paper and electronic means.

Personal Data will be stored for the period of time strictly necessary to execute your participation to the challenge.

## 5. DATA RECIPIENTS

The personal data collected as above are processed by staff from FONDAZIONE SERENA, acting on specific instructions concerning purposes and arrangements of such processing.

## 6. DATA SUBJECTS' RIGHTS

Data subjects have the right to:

- a) Right of access\_ The data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data (art.15 GDPR);
- b) Right to rectification\_ The data subject has the right to obtain from the controller the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement (art. 16 GDPR);
- c) Right to erasure\_The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay (art.17 GDPR);
- d) Right to restriction of processing\_ The data subject has the right to obtain from the controller restriction of processing where one of the situations provided for by the law applies (art.18 GDPR);
- e) Right to data portability\_ The data subject has the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format (art.20 GDPR);
- f) Right to object\_ The data subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1). The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. (art.21 GDPR);

Please contact the FONDAZIONE SERENA's DPO to lodge all requests to exercise these rights.

## 9. DATA CONTROLLER and DATA PROTECTION OFFICER

The Data Controller is FONDAZIONE SERENA ONLUS located in Piazza Ospedale Maggiore, 3 – 20162 Milano.

The Data Protection Officer can be contacted here: [privacy@centrocliconemo.it](mailto:privacy@centrocliconemo.it).

THE DATA CONTROLLER  
FONDAZIONE SERENA

