

## **INFORMATION FOR THE PROCESSING OF PERSONAL DATA**

Fondazione Nibit Onlus, with registered office in Via G. Mameli 3/1 - 16122 Genova (GE) F.C. and VAT 02143960991 (later, "Owner"), as data controller, informs you according to the art. 13 D.Lgs. 30.6.2003 n. 196 (later, "Privacy Code") and art. 13 EU regulation n. 2016/679 (later, "GDPR") that your data will be processed in the manner and for the following purposes:

### **1. Object of the Treatment**

The Data Controller processes personal data, such as name, surname, company name, address, telephone number, e-mail address, bank and payment details) - afterwards, "Personal data" or even "data") communicated by you when contracts have been concluded for the services of the Data Controller.

### **2. Purpose of the treatment**

Your personal data are processed:

A) without your express consent art. 24 lett. a), b), c) Privacy Code and art. 6 lett. b), e) of GDPR for the following Service Purposes:

- conclude the contracts for the services of the Owner;
- fulfill the pre-contractual, contractual and tax obligations deriving from relations with you in existence;
- fulfill the obligations established by law, by a regulation, by community legislation or by an order of the Authority (such as for anti-money laundering);
- exercise the rights of the owner, for example the right to defense in court;

B) Only subject to your specific and distinct consent (art. 23 e 130 Privacy Code and art. 7 GDPR), for the following Marketing Purposes:

- send via e-mail, mail and / or sms and / or telephone contacts, newsletters, commercial communications and / or advertising material on products or services offered by the Owner and detection of the degree of satisfaction on the quality of services;
- send via e-mail, mail and / or sms and / or telephone contacts commercial and / or promotional communications of third parties (for example, business partners, insurance companies, other companies).

Please note that if you are already a customer, we may send you commercial communications relating to services and products of the Owner similar to those you have already used, subject to your disagreement (Article 130 paragraph 4 of the Privacy Code).

### **3. Method of treatment**

The processing of your personal data is carried out by means of the operations indicated in art. 4 of the Privacy Code and art. 4 n. 2) GDPR and more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and

destruction of data. Your personal data are subjected to both paper and electronic and / or automated processing.

Your data will be stored in electronic digital format to perform the possible accounting / tax audits and legal obligations in the tourism sector.

The Data Controller will process personal data for the time necessary to fulfill the aforementioned purposes and in any case for no longer from the termination of the relationship for the purposes of service and no later than from the collection of data for the purposes of marketing.

#### **4. Access to data**

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B):

- to employees and collaborators of the owner or of the company Medianet Group Snc based in Viale Curtatone 7 53100 Siena F.C. 00966810525 VAT No. 00966810525, as Data Processor in the capacity of agents and / or internal managers of the processing and / or management system administrators;

- to employees and collaborators of the company RAY HC Srl based in Via Pietro Paleocapa 6 20121 Milan F.C. 10117680156 VAT No. 10117680156, as Data Processor in the capacity of financial and fiscal manager

- to third party companies or other subjects (as an indication, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, etc.) who carry out outsourced activities on behalf of the Owner, in their capacity as external managers of the treatment.

#### **5. Data communication**

Without the need for express consent (ex Article 24 letter a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to in art. 2.A) to Supervisory Bodies, Judicial Authorities, to insurance companies for the provision of insurance services, as well as to those subjects to whom the communication is mandatory by law for the accomplishment of said purposes. These subjects will process the data in their capacity as independent data controllers. Only through explicit authorization will personal data be transferred to third parties for marketing purposes.

Your data will not be disseminated.

#### **6. Data transfer**

Personal data is stored on servers located in ATALANTA (USA). In any case it is understood that the Data Controller, if necessary, will have the right to move the servers to the EU as well. In this case, the Data Controller hereby ensures that the transfer of EU data will take place in accordance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided by the European Commission.

#### **7. Nature of providing data and consequences of refusing to answer**

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we can not guarantee the services of the art. 2.A).

The provision of data for the purposes referred to in art. 2.B) is optional. You can therefore decide not to give any data or to subsequently deny the possibility of processing data already provided: in this case, you will not be able to receive newsletters, commercial communications and advertising material concerning the Services offered by the Data

Controller. However, you will continue to be entitled to the Services referred to in art. 2.A).

## **8. Rights of the interested party**

In your capacity as an interested party, you have the rights set forth in art. 7 of the Privacy Code and art. 15 GDPR and precisely the rights of:

- 1-** obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- 2-** obtain the indication: a) of the origin of personal data; b) of the purposes and methods of the processing; c) of the logic applied in case of treatment carried out with the aid of electronic instruments; d) of the identification details of the owner, the managers and the designated representative pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, GDPR; e) of the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents;
- 3-** obtain: a) updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right;
- 4-** to object, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the data subject to exercise the right to object even only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication. Where applicable, it also has the rights referred to in Articles 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

## **9. How to exercise rights**

You can exercise your rights at any time by sending:

- a registered letter a.r. to Fondazione Nibit Onlus – based in Via G. Mameli 3/1 - 16122 Genova (GE);
- an e-mail to the address [segreteria@fondazioneibit.org](mailto:segreteria@fondazioneibit.org) .

## **10. Owner, manager and agents**

The data controller is Fondazione Nibit Onlus – based in Via G. Mameli 3/1 - 16122 Genova (GE).

The updated list of data processors and data processors is kept at the registered office of the Data Controller.

## **11. COOKIES AND SIMILAR TECHNOLOGIES**

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The cds are similar to technical cookies. analytics cookies, aggregated, on the number of users and on how to find information, even functional cookies, selected criteria (for example, language, products selected for purchase) To use learning preferences, as for the use of the language. The use of c.d. Session cookies (which are not stored permanently on your computer and are disabled by closing your browser) is necessary to allow safe and efficient browsing of the site.

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