

PRIVACY POLICY FORM – CUSTOMERS

Information to the Interested Party made pursuant to and for the purposes of art. 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27th April 2016

Introduction

Pursuant to and for the purposes of art. 13 of the Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27th April 2016, concerning the protection of individuals with regard to the processing of personal data, as well as the free circulation of such data and repealing Directive 95/46 / CE (general data protection regulation; hereinafter "General Data Protection Regulation" or "GDPR") Orsolina 28 Ssdl (hereinafter "Company"), located in Via Caminata, 8 - 14036 Moncalvo (AT), as data controller (hereinafter "Owner") of your personal data is required to provide specific information regarding the purposes and methods of treatment of your data, to the subjects to which they can be communicated and to the rights of which you enjoy (hereinafter "Interested Party").

1. Identity and contact details of the data controller

ORSOLINA28 S.s.d.r.l.

Via Caminata 28

14036 Moncalvo (AT)

Tel.: +39 0141 916532

Cell.: +39 3283581023

Internet Site: www.orsolina28.it/contatti/

E-mail: info@orsolina28.it

PEC: orsolina28ssdl@pec.it

2. Purposes of the processing to which personal data are destined, as well as the legal basis

The processing of your personal data is carried out in the performance of the economic and commercial activities of the Data Controller for purposes related to enrollment and participation in the courses, as well as for other instrumental purposes; in particular, the purposes of the processing are as follows:

- a) Provision of services that you requested;
- b) execution of obligations strictly related to the management of the contract, including administrative and accounting management, the issue of tax documents and the management of receipts;
- c) execution of activities being necessary for the management of the contract, including the planning of activities, the management of any disputes and the credit recovery;
- d) communication and / or dissemination, for information and / or promotional purposes, of video films and / or photographic images depicting the Interested Party during the course and / or during the event;
- e) communication to the National Educational Sports Center (hereinafter "CSEN") for the registration of the Interested Party and insurance coverage;
- f) fulfillment of obligations deriving from the law, regulations or legislation related to the contractual relationship;
- g) if the Interested Party has requested to use the overnight stay, transfer to Orsolina Società Agricola S.s. and Orsolina Srl, of the personal data is necessary for the provision of the overnight stay service in the premises owned by the same;
- h) registration for the receipt of a periodic newsletter;
- i) to promote the service through marketing activities, commercial initiatives, advertising communications, carried out through both traditional contact methods (such as paper mail and telephone contact) and automated, pursuant to art. 130 - paragraphs 1 and 2 of the Privacy Code (consisting in sending standardized communications through systems such as newsletters, sms, social networks) pursuant to Legislative Decree 30 June 2003, n. 196, as amended by Legislative Decree 10 August 2018, n. 101.

3. Modalities of data processing

In relation to the purposes above mentioned, personal data are processed electronically and on paper, with manual and / or automated systems, in compliance with the adequate security measures prepared by the Data Controller.

The data themselves are stored by adopting appropriate and suitable technical and organizational measures, all aimed at minimizing the risks of destruction, loss, modification, unauthorized disclosure or access, in an accidental or illegal way. All processing operations are carried out in such a way as to guarantee the integrity, confidentiality and availability of personal data.

4. Recipients of personal data

The personal data collected directly from you will also be communicated to:

- parties whose right of access to such data is recognized pursuant to regulatory provisions;
- our collaborators, employees, as part of their duties as subjects authorized by the Data Controller to process your data;
- individuals and / or legal entities, public and / or private when the communication is necessary or functional to the performance of our activity and for the purposes described above;
- potential employer companies, other accredited bodies for training or guidance activities. As required by Legislative Decree 276/2003, the data will also be communicated to the National Work Exchange according to the methods envisaged by the implementing legislation;
- CSEN;
- Orsolina Società Agricola S.s e Orsolina Srl., in the case of overnight stay only.

5. Transfer of personal data to a third country or an international organization

The Data Controller does not carry out any transfer of the personal data beyond national borders and in any case not outside the European Union.

6. Period of storage of personal data

The personal data processed will be kept for the entire duration of the contract, except for those data whose retention is mandatory by law.

For the purposes referred to in letter h) and i), the personal data will be stored even beyond the duration of the services requested by you and in any case not beyond the possible unsubscription request.

7. Rights of the Interested Party

The Interested Party has the option to exercise the following rights:

- access (art. 15 of GDPR);
- correction (art. 16 of GDPR);
- cancellation (art. 17 of GDPR);
- limitation (art. 18 of GDPR);
- portability (art. 20 of GDPR);
- opposition (art. 21 of GDPR).

These rights are reported in detail, at the end of this document.

8. Right to withdraw the treatment (art. 7, par. 3 of the GDPR) for the purposes requiring the express consent (art. 7, par. 3 del GDPR)

The Interested Party, for the purposes referred to in letters d), g), h) and i), can withdraw the consent at any time without affecting the lawfulness of the processing based on consent before the revocation.

The Interested Party may request the revocation of consent by sending a registered letter with return receipt to the following address - ORSOLINA28 Ssdrl, Via Caminata 28, 14036 Moncalvo (AT) - attaching a photocopy of his valid identity document and mentioning the following text "Withdrawal of consent to the processing of my personal data".

9. Claim to the Data Controller

You have the right to file a complaint with the Data Controller in the manner that it deems most appropriate, handing it over to the offices of the Data Controller (at the address indicated below) or by sending:

- registered letter with return receipt addressed to the Data Controller for the protection of personal data, Piazza Venezia, 11 - 00187 Rome;;
- certified e-mail message addressed to protocollo@pec.gdp.it.

The complaint form can be viewed at the following links:

- <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9041356> (formato DOCX)
- <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9041366&zx=6oqyl4ptqzh8> (formato PDF)

10. Type of data provision and consequences of any waste

The provision of data by you is mandatory as these are essential for the fulfillment of legal and contractual obligations and, therefore, any refusal to provide them may result in the impossibility for the Company to execute the contract.

In any case, pursuant to art. 6, par. 1, lett. c) of the GDPR, the consent of the Interested Party is not required for the treatment, including the collection, of personal data coming from public registers or necessary to perform obligations under the law or, pursuant to art. 6, par. 1 letter b) of the GDPR, deriving from a contract to which the Interested Party is a party (such as that underlying the relations with the Company).

The provision of data for the purposes referred to in letters d), g), h) and i) is not mandatory.

11. Automated decision making process

The Interested Party is not subject to any decision based solely on the automated processing of personal data.

12. Glossary

- **Personal Data:** any information concerning an identified or identifiable natural person (Interested Party); the natural person that can be identified, directly or indirectly, with particular reference to an identifier such as the name, an identification number, location data, an online identifier or one or more characteristic elements of his physical identity, is identifiable physiological, genetic, psychic, economic, cultural or social.
- **Processing** any operation or set of operations, carried out with or without the help of automated processes and applied to personal data or sets of personal data, such as the collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of provision, comparison or interconnection, limitation, cancellation or destruction.
- **Limitation of processing:** the marking of personal data stored with the aim of limiting processing in the future.
- **Consent of the Interested Party:** any manifestation of free will, specific, informed and unambiguous of the Interested Party, with which the same expresses his / her assent, through unequivocal positive declaration or action, that the personal data concerning him / her are processed.
- **Categories of particular personal data:** personal data revealing racial or ethnic origin, political opinions, religious or philosophical convictions, or trade union membership, as well as processing genetic data, biometric data intended to uniquely identify an individual, health data or sexual life or sexual orientation of the person.
- **Data Controller:** the natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of processing personal data.
- **Data Processor:** the natural or legal person, public authority, service or other body that processes personal data on behalf of the data controller.

13. Rights of the Interested Party (detail)

- Right of access: the Interested Party has the right to obtain from the Controller the confirmation that the processing of the personal data concerning him / her is being carried out and in this case, to obtain access to the personal data and to the following information: a) the purposes of the processing; b) the categories of the personal data in question; c) the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if they are recipients of third countries or international organizations; d) when possible, the retention period of the personal data provided or, if this is not possible, the criteria used to determine this period; e) the existence of the data subject's right to request the data controller to rectify or delete personal data or limit the processing of personal data concerning him / her or to oppose their processing; f) the right to file a complaint with a supervisory authority; g) if the data are not collected from the Interested Party, all available information on their origin; h) the existence of an automated decision-making process, including the profiling referred to in Art. 22, par. 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such treatment for the Interested Party.
- Right of correction: the Interested Party has the right to obtain from the data controller the rectification of inaccurate personal data concerning him without unjustified delay. Taking into account the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, even providing a supplementary declaration.
- Right to cancellation: the Interested Party has the right to obtain from the Data Controller the cancellation of the personal data concerning him / her without unjustified delay and the Data Controller has the obligation to cancel the personal data without unjustified delay, if one of the following reasons exists: a) the personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed; b) the data subject withdraws the consent on which the processing is based in accordance with Art. 6, par. 1, letter a), or Art. 9, par. 2, letter a), and if there is no other legal basis for the processing ; c) the Interested Party opposes the processing pursuant to Art. 21, paragraph 1, and there is no legitimate prevailing reason to proceed with the processing, or he opposes the processing pursuant to Art. 21, par. 2; d) personal data have been processed unlawfully; e) personal data must be cancelled in order to fulfill a legal obligation established by Union law or by the Member State to which the Data Controller is subject; f) personal data have been collected in relation to the offer of information society services referred to in Art. 8, par. 1.
- Right to limit the processing: the Interested Party has the right to obtain the processing limitation from the Data Controller when one of the following hypotheses occurs: a) the data subject disputes the accuracy of the personal data, for the period necessary for the data controller to verify the accuracy of such personal data; b) the processing is unlawful and the data subject opposes the deletion of personal data and requests instead that its use be limited; c) although the data controller no longer needs it for the purposes of processing, personal data is necessary for the data subject to ascertain, exercise or defend a right in court; d) the data subject has opposed the processing pursuant to Art. 21, par. 1, pending verification regarding the possible prevalence of the legitimate reasons of the Data Controller with respect to those of the Interested Party.
 - o If the processing is limited pursuant to pa. 1, such personal data shall be processed, except for their storage, only with the consent of the Interested Party or for the verification, exercise or defense of a right in court or for to protect the rights of another natural or legal person or for reasons of significant public interest of the Union or a Member State..
- Right to the portabilità of the data: the Interested Party has the right to receive in a structured format, commonly used and readable by automatic device, the personal data concerning him provided to a Data Controller and has the right to transmit such data to another data controller without hindrance by part of the data controller to whom it was supplied if: a) the processing is based on consent pursuant to Art.e 6, par. 1, letter a), or Art. 9, par. 2, letter a), or on a contract pursuant to Art. 6, par. 1, letter b); and b) the processing is carried out by automated means.
 - o In exercising their rights with respect to the portabilità of the data pursuant to par. 1, the Interested Party has the right to obtain direct transmission of personal data from one data controller to another, if technically feasible.
- Right to opposition: the Interested Party has the right to object at any time, for reasons connected to his particular situation, to the processing of personal data concerning him pursuant to Art. 6, par. 1, letters e) of), including profiling on the basis of these provisions. The Data Controller refrains from further processing personal data unless he demonstrates the existence of legitimate cogent reasons for proceeding with processing that prevail over the interests, rights and freedoms of the Interested Party or for verification, exercise or the defense of a right in court.
 - o If personal data are processed for direct marketing purposes, the Interested Party has the right to object at any time to the processing of personal data concerning him for these purposes, including profiling to the extent that it is connected to such direct marketing.
 - o If the Interested Party opposes the processing for direct marketing purposes, the personal data are no longer processed for these purposes.

The undersigned _____ declares to have received the information pursuant to art. 13 of the GDPR, in particular with regard to the rights recognized by the same and to consent, pursuant to and for the purposes of Art. 7 and following of the GDPR, to the processing of personal data in the manner and for the purposes indicated in this statement, however strictly connected and instrumental to the management of the contractual relationship.

Place and date

Signature

The undersigned _____ CONSENTS DOES NOT CONSENT
to the processing for the purposes referred to in the letter d).

The undersigned _____ CONSENTS DOES NOT CONSENT
to the processing for the purposes referred to in the letter g).

The undersigned _____ CONSENTS DOES NOT CONSENT
to the processing for the purposes referred to in the letter h).

The undersigned _____ CONSENTS DOES NOT CONSENT
to the processing for the purposes referred to in the letter i).

Place and date

Signature
