

INFORMATION ON THE PROTECTION OF PERSONAL DATA PARTICIPANTS IN WEBINARS

Dear Sir/Madame (in the following, the Data Subjects),

the following paragraphs contain a series of useful information to understand how we process your personal information, which you voluntarily make available to the Data Controller, in compliance with the principles of lawfulness, correctness and transparency provided for by the current provisions concerning the protection of personal data (EU Regulation 679/2016 (GDPR), Italian Legislative Decree 196/2003, Italian Legislative Decree 101/2018, Provisions of the Italian Authority, etc.).

We therefore invite you to read this information carefully.

1. **DEFINITIONS**

Legislation (in force regarding the protection of personal data) Privacy	Set of all the legislation relating to the protection of personal data: EU Regulation 679/2016 (GDPR or RGPD), Legislative Decree 196/2003 (Code), Legislative Decree 101/2018, Legislative Decree 51/2018, Guidelines of the EDPB (ex WP29), Deontological rules and general authorizations of the Guarantor Authority, Provisions of the Guarantor Authority where applicable, International regulation of the scope.
Processing	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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Personal Data	any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person 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
Special categories of personal data (formerly sensitive data)	Personal information relating to ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, state of health, life or sexual orientation of the person concerned, as well as genetic, biometric and geo-localization information.
data relating to criminal convictions and offences	Personal data relating to criminal convictions and offences or related security measures

2. DATA CONTROLLER

POLI.design Scrl (hereinafter POLI.design) - with registered office in Via Don Giovanni Verità n. 25, 20158 Milan; Italian Tax Code / VAT number 12878090153 - in the person of the protempore legal representative, is the Data Controller of your personal data according to the

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definition given in the **DEFINITIONS** paragraph of this document. For any information, you can contact him at the e-mail address <u>privacy@polidesign.net</u>. The Data Controller has proceeded to identify and appoint a Personal Data Protection Officer or Data Protection Officer (hereinafter DPO), available at the e-mail address <u>dpo@polidesign.net</u>.

3. DATA SOURCE

The data being processed (name, surname, telephone number, e-mail address, nationality, training / profession background) are those provided by you as part of the registration process for events (including for educational purposes), also delivered online (webinar), organized by POLI.design.

4. COMPULSORY PROVISION OF DATA

Failure or partial or incorrect provision of the requested data makes your contractual relationship with POLI.design impossible and consequently prevent participation in these events.

5. PURPOSES and LEGAL BASIS OF THE PROCESSING

POLI.design will process the personal data you communicated:

- a) for the execution of a contract with the Data Subject (see GDPR art. 6.1.b);
- b) to communicate to the Data Subject the information relating to how events are held in its geographical area (see GDPR art. 6.1.f legitimate interest);
- c) upon your free and explicit consent, for the transmission of newsletters relating to the institutional activities carried out by POLI.design within the relevant geographical area (see GDPR art. 6.1.a).

All those protection activities that the Data Controller initiates in the exercise of its function as a service provider on the internet are to be considered legitimate interest of the Data Controller.

6. LOCALIZATION and DURATION OF THE PROCESSING

Your data are processed for a maximum period of 10 (ten) years for the purposes referred to in points 4.a). While, for the purposes referred to in point 4.b) they will be processed for a maximum period of 2 (two) years, except for longer periods for protection events that can be activated during this period. Conversely, for the purpose 4.c) (consent) your data are processed for 2 (two) years and, in any case, until the consent is revoked, which can take place at any time through the appropriate link in the newsletter or by writing to the e-mail address privacy@polidesign.net.

7. PLACE OF DATA PROCESSING AND PROCESSING METHOD

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Your data is processed in the Italian territory or in countries permitted by European Union regulations. However, based on your nationality, your data could be processed locally in compliance with the laws of your country of origin by local Agents, appointed by POLI design, for the "Recruiting" of students. The processing of personal data (by way of example and not limited to collection, processing, consultation, printing, archiving, modification and updating) takes place using tools and procedures suitable and adequate to guarantee their security and confidentiality and can be carried out with automated and non-automated methods. The treatments are related to the use of communication platforms chosen for their characteristics of stability and safety certifications. The Processors of the platforms currently used (LogMeIn Ireland Limited for the GoToWebinar and GoToMeeting platforms; Zoom Video Communications, Inc. for Zoom Meeting and Zoom Room; Microsoft Teams, Cisco Webex), Processors or Sub- Processors of the processing, in their own standardized contracts all have declared that they accept the standard contractual clauses envisaged for transfers outside the European Union. However, it is not excluded that such data (including those relating to electronic communications) may be the subject of "observations" made by the US Authority for its own national security reasons.

The data will not be disclosed to third parties not mentioned in this paragraph.

N.B.: POLI.design Scrl does not profile your data nor implement automated decision-making processes.

8. COMMUNICATION OF YOUR DATA TO THIRD PARTIES

Your personal data may be transferred to local Agents, appointed by POLI.design, operating in your country of origin for the "Recruiting" of students and any subsequent contacts. Furthermore, only employees and collaborators who operate under the authority of the Data Controller as well as by structures that perform, on behalf of the Data Controller, technical support tasks (company checks, maintenance and / or repair of IT equipment) may become aware of them. Pursuant to art. 28 of the GDPR, the Data Controller has formally appointed the third-party recipients as Data Processors in accordance with the provisions of the law. The list of appointed data processors is always available upon simple request.

9. YOUR RIGHTS

With reference to the data provided and the related processing by the Data Controller, where applicable, you may exercise the following rights:

- right of access to personal data concerning you, pursuant to Article 15 of the GDPR;
- right of rectification, pursuant to Article 16 of the GDPR;
- right to cancel your data, pursuant to Article 17 of the GDPR;
- right to limit the processing of your data, pursuant to Article 18 of the GDPR;

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- right to portability of your data, pursuant to Article 20 of the GDPR;
- right to object to the processing of data, pursuant to Article 21 of the GDPR.

You can address any request regarding your rights directly to the Data Controller at the e-mail address <u>privacy@polidesign.net</u>. You are also entitled to lodge a complaint with the supervisory authority in accordance with the provisions of art. 77 of the GDPR.

N.B.: POLI.design Scrl, while maintaining constant attention to the processing of personal data, reserves the right to proceed, at any time, to update the information on this statement.

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Società consortile

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CONSENT

POLI.design invites you to express your consent after reading the above information.

I declare that I have read and understood the information herein.

Furthermore, we ask you to express your clear and free consent on receiving newsletters.

Name

Email

□ (AFFIRMATIVE) I consent to the sending to my e-mail address of the newsletters produced periodically by POLI.design.

□ (NEGATIVE) I DO NOT consent to the sending of newsletters periodically produced by POLI.design to my email address.

POLI.design thanks you for what you have communicated.

Date Signature.....

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