

PRIVACY NOTICE FOR WEBSITE USERS

according to article 13 of the Regulation (EU) 2016/679 (“GDPR”) General Data Protection Regulation

DATA CONTROLLER

Fondazione Sanlorenzo

Tax Code n. IT91100550119

Place of business: Via Armezzone 3, Ameglia, 19031, La Spezia (SP)

In accordance with Art. 13 of the Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter “GDPR”), Fondazione Sanlorenzo (hereinafter “Data Controller” or “Fondazione”), as Data Controller, inform you (hereinafter “User”) that your personal data will be processed for the following purposes and in the following manner:

1. Types of data collected

The Data Controller processes identification data and usage data of the User collected during the User’s navigation through the Data Controller’s website (hereinafter “Website”). The Data Controller’s website can be reached at <https://sanlorenzofondazione.org/> (hereinafter, “Personal data” or “Data”).

The information relating to the network used by the User (e.g. IP address) may also be collected and processed by the Data Controller.

2. Purposes and legal basis of processing

Your Personal data will be processed for the following purposes:

- a) respond to User’s requests for information via e-mail provided by the User filling-out the contact form;
- b) acquire statistics and metrics to ensure the proper functioning of the Website;
- c) exercise the rights of the Data Controller (e.g. data processing for exercise or defence of legal claims)

The legal basis for the data processing is the following:

- With regard to the purpose (a), the processing is necessary for the performance of a contract to which the User is party to or in order to take steps at the request of the User prior to entering into a contract;
- With regard to the purposes (b) and (c), the legitimate interest of the Data Controller, in particular, to monitor the proper functioning of the Website and to process Personal data where necessary for the establishment, exercise or defence of legal claims, constitute the legal basis for the Personal Data processing.

The Users are free not to communicate the Data for the above-mentioned purposes. Failure to provide the Data, however, may make it impossible for the Website to provide its services.

The User's Data can also be processed through Cookies. In order to obtain more information about the processing, please visit the Cookie Policy at the following link: <https://www.iubenda.com/privacy-policy/49734593/cookie-policy>.

3. Retention time

The Data Controller will store and process Personal data for the period of time necessary to fulfill the purposes specified in this Privacy notice. Your Data will not be retained for a longer period of time unless the current law requires a more extended retention period. The Italian Civil Code requires to store all the documents of commercial or legal relevance for the period of 10 years. The Personal Data can also be stored for the period of time necessary for the establishment, exercise or defence of legal claims.

4. Disclosure of personal data

The User's Personal data will not be disseminated but may be made accessible where necessary for offering of services or for statutory obligations to:

- employees or collaborators of the Data Controller in Italy or abroad, in their capacity of subjects authorized to process Personal data and/ or system administrators.
- third-party companies or other subjects (e.g. credit institutions, IT consultants etc.) which carry out activities in outsourcing on behalf of the Data Controller, in their capacity of Processors.

The Data Controller may communicate your Personal data for the purposes established by Art. 2 of the present Privacy notice to supervisory authorities, legal authorities, public authorities to which it is obligatory to communicate the Data, as well as to those subjects to which the communication is obligatory by law for the fulfillment of the above mentioned purposes.

5. Transfer of personal data

The Personal data will be stored on servers located within the European Union and managed by third-party companies duly appointed as Processors.

The Data Controller may transfer the User's Personal data to a third country. The data will be transferred exclusively to countries considered "adequate" and therefore, "safe" by the European Commission or to the companies which ensure appropriate safeguards pursuant to Articles 44-50 of the GDPR.

6. Users Rights

You may exercise the rights granted by the GDPR (articles 15-22), including:

- a. The right to receive confirmation as to whether the Data Controller is processing the User's Personal data (access rights);
- b. The right to update, modify and/ or correct Personal data (right of rectification);
- c. The right to request the erasure of data or the restriction of the processing. This right can be granted if the process is unlawful or the Data Controller no longer needs the Personal data for the purposes of the processing (right to be forgotten and right to restriction of processing);
- d. The right to oppose to the processing (right of opposition);

- e. The right to propose a complaint to the Supervisory Authority in case of violation of the regulations regarding the protection of Personal data;
- f. The right to receive an electronic copy of the User's Personal data (in a structured, commonly used and machine-readable format) and right to transmit those Data to another Data Controller without hindrance from the Data Controller to which the Personal Data have been provided (right to Data portability).

7. Data Controller contact information

The controller of your personal data is Fondazione Sanlorenzo, tax code 91100550119.

Email: info@sanlorenzofondazione.org

Address: Via Armezzone 3, Ameglia, 19031, La Spezia (SP)."

8. Data Protection Officer contact information

Contact details of the Data Protection Officer (DPO):

Email: dpo.fondazionesanlorenzo@argobs.com

When contacting us, the Data Subject must ensure to include their name, email/postal address and/or telephone number(s) to ensure that their request can be handled correctly."

9. Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

Privacy Notice updated on: April 27th, 2023