



PRIVACY POLICY

Processing of Personal Data – Informative Notices (Regulation (EU) 2016/679 – EU General Data Protection Regulation - GDPR)

Preamble

This privacy policy explains how we use any personal information we collect about you through the website www.puntosud.org, its sub-domains (for example www.academy.puntosud.org) and other websites managed by **Fondazione punto.sud**.

Data Controller

Fondazione punto.sud, Via Angera 3 – 20125 Milan (Italy), as Data Controller, hereby acting through its President and legal representative pro tempore, informs that, pursuant to **art. 13 of the GDPR**, your data will be processed as follows.

Information we may collect from you

We do not deliberately collect any sensitive data through our websites. On the contrary, we may collect and process the following data about you:

- Information that you provide by filling in forms on our sites. This includes information you provide when registering to use our sites, platform or helpdesk services, subscribing to our email services and newsletters, booking onto a course or event, posting a job advert or requesting further services. The information you provide to us may include:
 - Personal data, like name and surname, age, sex, fiscal code number, residential or home address, nationality and contact details, including email address, phone or skype details, your organisation, your role, your working country, etc.
 - Credit card, bank and/or payment details
- Information that you provide for job placement. This includes the following personal data: name and surname, telephone number and email address, place of residence or domicile, photographic images, information on qualifications, education, work performance, professional experience and other additional information necessary to enter into and manage the relevant employment agreement, if



any, including information on your own state of health which is necessary for the employment relationship.

- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them, keeping a record of that correspondence.
- We track which parts of our websites you visit and the resources you access.

Purposes of processing

Your personal data will only be processed for the following purposes:

- Respond to a request from you;
- Complete all the phases connected to your donation and/or to your adhesion to the projects and specific appeals and/or to your participation to training sessions promoted by punto.sud;
- Keep you updated with news from punto.sud by sending informative, promotional and fundraising communications relating to the activities and initiatives of punto.sud, with appropriate personalization according to the interests and preferences expressed by you;
- Notify you of new punto.sud courses;
- Conduct statistical studies and market research.

Processing

The processing of your personal data is carried out with reference to the operations indicated in art. 4 n. 2 of the GDPR, namely: 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 processing, including automated processing, in order to guarantee the security and confidentiality of data in accordance with current legislation, inspired by the principles of fairness and lawfulness of data treatment.

Access to data and persons or entities to whom your data may be disclosed

The personal data processed may be known only by personnel specifically in charge of processing operations and may be disclosed:

- To the banking institutions that will process the data for the purposes related to the management of the means of payment;
- To third parties to whom communications and other processing activities are entrusted (e.g. DOCEBO for the learning platform; Mailchimp for the sending of the newsletter; KUDU for the management of the relational database and for the sending of the newsletter; other consultancies for the management of communication and marketing campaigns);
- To third parties to whom communications of data that is necessary to comply with laws or regulations (administrative obligations).

Cookies

On the website www.puntosud.org and on the other *Fondazione punto.sud* websites, we use cookies for different purposes. For more details on our cookie policy please click [here](#).

Period of retention

Personal data collected will be kept for the time necessary to fulfill the aforementioned purposes and in any case for at most the period allowed by law for legal protection requirements.

Rights of the data subject

Right of access by the data subject (art. 15 e 16 del Reg. UE 2016/679)

The data subject shall have 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 and the following information:

- a) The purposes of the processing;
- b) The categories of personal data concerned;
- c) The recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) The existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) The right to lodge a complaint with a supervisory authority;
- g) The existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Right to rectification (art. 16 GDPR)

The data subject shall have the right to obtain from the controller without undue delay 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.

Right to erasure ('right to be forgotten') (art. 17 GDPR)

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 where one of the following grounds applies:

- a) The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) The data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;

- c) The data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- d) The personal data have been unlawfully processed;
- e) The personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) The personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

Right to restriction of processing (art. 18 GDPR)

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) The data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

Right to data portability (art. 20 GDPR)

The data subject shall have 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 and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

How to exercise your rights

At any moment, you may exercise rights by sending:

- A registered letter with return receipt to **Fondazione punto.sud, Via Angera 3 – 20125 Milan (Italy)**
- An e-mail to: puntosud@puntosud.org

To know more

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to puntosud@puntosud.org

Last revision date

25 May 2018

Any changes we may make to our privacy policy in the future will be posted on this page (<https://www.puntosud.org/privacy-policy/>)