

Privacy Policy on the Processing of Personal Data for Silicon Valley Study Tour application

(pursuant to and for the purposes of Article 13 of EU Regulation No. 679/16)

The Data Controller, as identified below, pursuant to EU Regulation 679/16 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter "Regulation"), informs that it will proceed to the processing of data for the purposes and with the methods indicated below.

According to the provisions of the Regulation, the processing will be based on the principles of correctness, lawfulness, transparency, and protection of confidentiality. Pursuant to Article 13 of the Regulation, we therefore provide the following information.

1. DATA CONTROLLER AND DATA PROCESSOR

The Data Controller (the "Controller") is Associazione La Storia nel Futuro, with registered office at Via ai Monti 2, 28897, Valstrona (VB) - Italy – fiscal code 01730980032, email: info@storianelfuturo.org lastorianelfuturo@pec.it.

2. TYPE OF PERSONAL DATA PROCESSED

The data processed by the Data Controller are:

2.1. personal identification data and sensitive data:

- name, surname, LinkedIn profile, university, faculty, year attended, membership or not in Lead The Future, employer, role in the company, motivations and questions, email address, profile picture, Instagram, Twitter, GitHub, birthday, gender, telephone number, country, city or region, public biography

The processing of data will be carried out in accordance with the provisions of the Regulation as specified below.

3. SOURCE OF PERSONAL DATA PROCESSED

The personal data processed are those collected from the data subject.

4. PURPOSE OF DATA COLLECTION (Article 13 paragraph 1 letter c of the Regulation)

The data will be processed exclusively for the following purposes:

- a) Sending information and organizing calls to participate in the event registration process,
- b) communications via electronic systems for appointment reminders and to promote products and/or services equal or similar to those referred to in this privacy policy (Article 130 paragraph 4 of Legislative Decree 196/03 and Article 6 letter a) of the Regulation) and data retention for a duration as indicated in the purposes;
- c) fulfillment of mandatory obligations for the provision of services in compliance with applicable laws (Article 6 paragraph 1 letters a, b, c) and data retention until the end of the service for a maximum of 10 years;
- d) management of any other administrative and organizational practices related to the service;
- e) management of any relationships with third parties, external to the service.

5. LEGAL BASIS FOR PROCESSING (Article 13 paragraph 1 letter c of the Regulation)



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www.storianelfuturo.org
www.siliconvalleystudytour.com
www.bostonstudytour.com
www.svst.it/hackathon

The lawfulness of the processing of personal data by the Data Controller is guaranteed pursuant to Article 6 of the Regulation as indicated in the individual purposes.

6. RECIPIENTS WHO MAY BECOME AWARE OF YOUR PERSONAL DATA (Article 13 paragraph 1 letter e) of the Regulation)

The categories of subjects who may become aware of your personal data are: authorized persons (employees and/or delegates of the Controller or the Data Processor), other service companies authorized by the Data Processor, DPO if appointed, any supervisory bodies.

7. TRANSFER OF PERSONAL DATA

1. The data may be transferred to Member States belonging to the EU, to the categories of subjects for whom communication is strictly necessary for the performance of the service.
2. The data may be transferred to third countries not belonging to the EU, to the categories of subjects for whom communication is strictly necessary for the performance of the service.

For further information, please contact the Data Controller.

8. METHODS OF PROCESSING

The processing will be carried out by appointees manually and/or automatically in compliance with Articles 30, 32, and 35 of the Regulation with the supervision of the Data Protection Officer (DPO), if appointed.

The processing will be carried out manually (e.g., collection of paper forms) and electronically or in any case with the aid of computerized or automated tools.

Personal data will be processed exclusively and to the extent strictly necessary to achieve the aforementioned processing purposes. In particular, the personal information collected will be used for the management of activities and in the performance of activities.

Further information and details on the methods of use and dissemination of data can be requested at the time of collection of information or by contacting the Controller through the contact details provided in the document.

9. AUTOMATED DECISION-MAKING AND PROFILING

The processing of your data does not take place:

- with the aid of automated decision-making processes
- with the use of profiling techniques

10. RIGHTS OF THE DATA SUBJECT

Articles 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23 of the Regulation confer on the data subject the exercise of specific rights, including:

1. Article 12 Information, communications, and transparent procedures for the exercise of the data subject's rights;
2. Article 13 Information to be provided where personal data are collected from the data subject;
3. Article 14 Information to be provided where personal data have not been obtained from the data subject;
4. Article 15 Right of Access: the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed;
5. Article 16 Right to rectification: the right to obtain from the Controller the rectification of inaccurate personal data concerning him or her;
6. Article 17 Right to erasure ('right to be forgotten'): the right to obtain from the Controller the erasure of personal data concerning him or her;



7. Article 18 Right to restriction of processing: the right to obtain from the Controller restriction of processing of personal data where the accuracy of the personal data is contested, where the processing is unlawful and where the data subject has objected to processing;
8. Article 19 Right to receive from the Controller notification in the event of rectification or erasure of personal data or restriction of processing;
9. Article 20 Right to data portability: to obtain data portability, i.e., to receive personal data from a controller, in a structured, commonly used and machine-readable format, and to transmit those data to another controller without hindrance;
10. Article 21 Right to object: to object to processing at any time, even in the case of processing for direct marketing purposes;
11. Article 22 Automated individual decision-making, including profiling;
12. Article 23 Restrictions.

The data subject may lodge a complaint with the Data Protection Authority, following the procedures and indications published on the official website of the Authority at www.garanteprivacy.it.

In exercising the rights referred to in Articles 12-23 of the Regulation, the data subject may confer, in writing, delegation or power of attorney to natural persons or to associations. Requests may be submitted to the Data Controller or the DPO, if appointed, via the email addresses indicated in the document.

11. DURATION OF PROCESSING (Article 13 paragraph 2 letter a) of the Regulation)

The processing of data will have a duration as indicated in the purposes, this duration is calculated from the last relationship between the Controller and the data subject. For technical reasons, the Controller will have another 120 days to verify the various archives and delete the data. However, if the data subject wishes to assert his or her rights in advance, he or she may send a formal request to the address of the Data Controller.

12. DATA PROTECTION OFFICER (DPO) (Article 13 paragraph 1 letter b) of the Regulation)

The identification details of the DPO (Data Protection Officer), if appointed, will be made known by the Data Controller.

For further information, please contact the Data Controller.

13. NATURE OF DATA PROVISION - CONSEQUENCES OF REFUSAL OF CONSENT (Article 13 paragraph 2 letter e) of the Regulation)

The provision of personal data is mandatory when strictly necessary to achieve the aforementioned processing purposes and failure to provide such data will make it impossible to establish or continue the contractual relationship.

Definitions

- **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 (or sensitive data):** Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- **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, organisation, 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; where the purposes and means

of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

- **Processor:** A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **Profiling:** Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- **Pseudonymisation:** The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

