

**Privacy Policy**  
**(Articles 13 and 14 EU Regulation No. 679/2016)**



### 1. Data Controller

Fondazione Giannino Bassetti, with registered office in Via Barozzi n.4, 20122 Milan, as Data Controller ("FGB") is committed to protecting the privacy of those who provide personal information, better defined below, through its data entry forms. This Privacy Policy has been written to enable the data subject to understand FGB's policy regarding his/her privacy, in particular, how his/her personal information will be handled after he/she has provided data in the Forms. This Privacy Policy will also provide the information necessary to enable you to consent to the processing of your personal data in an explicit and informed and appropriate manner. In general, all information and data provided by the data subject to FGB in the Forms as better defined in Section 3 below, will be processed by FGB in a lawful, fair and transparent manner. For this reason, FGB takes into account the internationally recognised principles governing the processing of personal data, such as purpose limitation, storage space limitation, data minimisation, data quality and confidentiality.

### 2. Data processed

Through the Forms, FGB collects and processes information about you (as an individual) and, if you choose to share it, about other people who consent to being identified per se or together with others whose information is collected. Information that makes a natural person identified or identifiable is classified as "Personal Data" and may be collected by FGB either when you choose to provide it through the Forms or in the course of providing Services (such as, but not limited to, Newsletter subscription or the like).

The types of Personal Data that may be processed by FGB through or thanks to the Forms are:

- I. **Personal Contact Data:** including, but not limited to, name, surname, telephone number, e-mail address, image and personal data relating to the person completing the Forms.

### 3. Scope, legal basis and processing options

The Personal Data described above will be processed, subject to specific consent where necessary, for the following purposes:

- a) to respond to specific requests for assistance or information ("**Response**" purposes);
- b) to perform obligations deriving from or functional to contracts entered into (also free of charge) with FGB, which may include the processing of Personal Data defined in an all-inclusive manner as ("**Newsletter and Social Activity Disclosure**");
- c) to fulfil any legal obligations ("**Compliance**" purposes);
- d) to promote the Foundation's activities, draw up studies, research; send informative material supporting the Foundation itself; send surveys to improve FGB's services ("customer satisfaction"), all via e-mail, sms, mms, traditional mail, telephone and/or through FGB's official pages on social networks ("**Promotion of FGB**" purposes);

The purposes of the **Response** are based on the need to execute a contract (free of charge) to which the data subject is a party or the execution of pre-contractual measures taken at the request of the same. The provision of Personal Data for the above-mentioned purposes is always optional, but if not provided, it may not be possible to execute the Reconciliation.

The legal basis for processing for the purposes of the "**Newsletter and Disclosure of social activities**" and "**Promotion of FGB**" is consent, for which reason these activities shall exist exclusively in force of the same (autonomous and separate).

The legal basis for **Compliance** purposes is the necessary fulfilment of a legal obligation to which FGB is subject, as well as the pursuit of FGB's legitimate interest in being able to establish, exercise and defend a right in court. In this context, the Personal Data provided by the data subject to FGB, may be disclosed to certain recipients indicated in Section 4.

### 4. Recipients and transfer of personal data

Personal Data may be shared with:

- Persons authorised by FGB to process Personal Data subject to the signing of a confidentiality agreement (e.g. employees, contractors, and system administrators of FGB);
- persons who typically act as data processors, including, by way of example and without limitation, companies that provide help desk services, consultants, e-mail and mail dispatchers, and more generally all the services necessary for the operation and organisation of FGB;
- subjects, entities or authorities to whom it is mandatory to communicate personal data under the Services or by virtue of legal provisions, orders of the authorities with respect to the purpose of Compliance.

(collectively "**Recipients**").

Some of your Personal Data is shared with Recipients who may be located outside the European Economic Area. We ensure that your Personal Data is processed by these recipients in accordance with the Regulation. Indeed, transfers may be based on an adequacy decision, the Standard Contractual Clauses approved by the European Commission or another appropriate legal basis. More information is available in writing from:

- Fondazione Giannino Bassetti, via Barozzi n.4 - 20122 Milano;  
- e mail: [privacy@fondazionebassetti.org](mailto:privacy@fondazionebassetti.org)

## 5. Storage of personal data

With reference to the purposes of **Response**, Personal Data will be kept only for the time necessary to fulfil these purposes.

Personal Data processed for the purposes of **Newsletter/Divulcation of social activities and Promotion** will be retained by FGB until the moment the data subject revokes consent. Once consent is withdrawn, FGB will not use Personal Data for such purposes, but may nevertheless retain the logs of consent and express denial, as may be necessary to protect FGB's interests against possible claims based on such processing.

Personal data processed for **Compliance** purposes will be retained by the Data Controllers for the period required by specific legal obligations or applicable legislation.

This is without prejudice, in any case, to storage for the purposes of legal protection provided for by applicable legislation and in particular by articles 2946 et seq. of the Italian Civil Code.

## 6. Rights that can be exercised by the data subject

The data subject has the right to ask the FGB, at any time, for access to, rectification or erasure of Personal Data or to object to their processing. He/she also has the right to request the restriction of processing in the cases provided for by Article 18 of the Regulations, as well as to obtain in a structured, commonly used and machine-readable format the data concerning him/her, in the cases provided for by Article 20 of the Regulations.

For Services that include a semi-automated decision based on Personal Data, the data subject also has the right to express his or her opinion and/or contest the semi-automated decision made, requesting the intervention of a person authorised by FGB to change the decision made.

Requests should be addressed in writing to:

- Fondazione Giannino Bassetti, via Barozzi n.4 - 20122 Milano;
- e mail: [privacy@fondazionebassetti.org](mailto:privacy@fondazionebassetti.org)

In any case, the data subject is always entitled to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), pursuant to Article 77 of the Regulation, if he/she considers that the processing of his/her Personal Data is contrary to the legislation in force.

## 7. Changes

This information notice is valid from 30/06/2020. FGB may also make changes and/or additions to this informative note, also as a consequence of possible subsequent changes and/or additions to the law. The changes will be notified in advance and the interested party can view the constantly updated text of the information notice on the FGB website

Read and understood the Privacy Policy above.

The undersigned:

Surname / Name \_\_\_\_\_

➤ with regard to the processing of Personal Data for the purpose of Newsletter and Social Activities Disclosure as defined in the Privacy Statement:

- I give my consent
- I deny consent

➤ in relation to the processing of Personal Data for the purpose of Promoting FGB's activities as defined in the Privacy Statement:

- I give my consent
- I deny consent

Date and signature

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