

## PRIVACY POLICY

(Article 13 of Regulation (EU) 2016/679)

Fondazione ERGO-MTM Italia welcomes you on the website [www.fondazionergo.it](http://www.fondazionergo.it) (the "Website") and, with this document ("Privacy Policy"), wants to inform you about purposes and methods of processing your personal data and on your rights as an interested party.

This Statement applies to your personal data collected through the Website or paper models and covers the various services offered by the Data Controller. We invite you to consider only the part of this Information concerning the purpose of the treatment pursued, which will depend on the service requested from time to time.

### 1. Who is the Data Controller

The data controller is Fondazione ERGO-MTM Italia, with registered office in via Albuzzi, 43, 21100, Varese (the "Owner"), in the person of its legal representative pro tempore. You can contact the Data Controller for the exercise of your rights listed in the following point 8, as well as to receive any information writing to: [fondazione@fondazionergo.it](mailto:fondazione@fondazionergo.it).

### 2. What personal data we process

#### 2.1 Navigation data

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This is information that is not collected to be associated with identified interested parties, but which by their very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of the computers used by users connecting to the site, the addresses in the Uniform Resource Identifier (URI) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (success, error, etc.) and other parameters relating to the operating system and the user's computer environment.

These data are used for the purpose of obtaining anonymous statistical information about the use of the site and to check its correct functioning and are deleted after processing. Data could be used to ascertain responsibility in case of hypothetical computer crimes against the site.

#### 2.2 Data provided voluntarily by the user

The optional, explicit and voluntary sending of e-mails to the addresses indicated on this site and the compilation of the "formats" (forms) involves the subsequent acquisition of the e-mail address, necessary to respond to requests and any other personal data communicated spontaneously to Fondazione Ergo through the Website. Specific summary information will be progressively reported or displayed on the pages of the Site prepared for particular services on request.

#### 2.3 Cookies

Through the Website, the Data Controller will also process your personal data through the use of cookies. For these treatments, Fondazione Ergo invites you to view the Cookie Policy available on the site.

### 3. Purpose of the processing and legal basis

This point contains a description of the possible purposes of processing pursued by the Data Controller according to the service you requested.



**Fondazione Ergo-MTM Italia**

Via Albuzzi n.43 - 21100 Varese

Tel.+39 0332 239979 - C.F. 95074630120 - P.IVA 03286280122

[fondazione@fondazionergo.it](mailto:fondazione@fondazionergo.it) - [fondazionergo.it](http://fondazionergo.it)

### 3.1 Requests made through the Website

Your personal data may be processed by the Data Controller to satisfy your requests formulated by writing to one of the e-mail addresses available on the Website or by filling in the forms on the Website. Failure to provide the requested data will make it impossible for the Data Controller to execute your request. The legal basis of the processing is the need to execute your request, in compliance with Article 6 (1) (b), GDPR.

Therefore, it is not necessary to acquire your prior consent to the processing. The data collected for this purpose will be processed and stored for the time strictly necessary to satisfy your request. However, if you also have an existing contract with the Data Controller, your personal data will be stored up to 10 years from the termination of the relationship between you and the Data Controller.

### 3.2 Reserved area

Your personal data may be used by Fondazione Ergo to satisfy your request for registration and access to the reserved areas of the Site.

Failure to provide the requested data will make it impossible for Fondazione Ergo to continue with his registration on the Site.

The legal basis for registration on the Site and the provision of related services is the necessity for the execution of your request, in compliance with Article 6 (1) (b), GDPR.

Therefore, it is not necessary to acquire your prior consent to the processing. The Data Controller will process your personal data only for the time necessary to manage the contract between you and the Data Controller.

### 3.3 Commercial communications and newsletters

When you want to be updated on the latest news about the products and services offered by Fondazione Ergo, you can join our marketing initiatives by allowing Fondazione Ergo to send you the newsletter and further commercial communications concerning the activity of Fondazione Ergo.

The legal basis for the sending of commercial communications and the newsletter is your express consent, which the Data Controller requests in all the pages of the website where you can join this service, in compliance with Article 6, paragraph 1, letter a), GDPR. Your personal data will be processed until you decide to withdraw your consent or object to the treatment.

Right to object to direct marketing activities We inform you that, at any time, you have the right to object to direct marketing activities, by contacting Fondazione Ergo to one of the contacts indicated in point 1 of this Notice or by clicking on the link provided in each communication, invites from the Data Controller.

### 3.4 Enrollment in online courses and events

Throughout the Website you can register for our courses and events. To execute your registration request, make the payment and manage the subsequent participation in the course, Fondazione ERGO-MTM Italia will process the personal data provided by you during the booking. The legal basis for the processing of your personal data for registration, payment and participation in courses and events managed by Fondazione Ergo is the need to execute the contract signed between you and Fondazione Ergo, in accordance with Article 6, paragraph 1, letter b), GDPR.

Therefore, it is not necessary to acquire your prior consent to the processing. Your personal data will be processed for the time necessary to conclude and manage the contract and to manage your subsequent requests for after-sales assistance.

Subsequently, your personal data will be kept for 10 years from the conclusion of the contract in accordance with the period prescribed by the Italian Civil Code. However, if the course provides for the issue of a certification or license, your personal data will be processed by Fondazione Ergo for the entire duration of the certification or license, as specified in the information you will receive during your participation in the course.



**Fondazione Ergo-MTM Italia**

Via Albuzzi n.43 - 21100 Varese

Tel.+39 0332 239979 - C.F. 95074630120 - P.IVA 03286280122

fondazione@fondazionergo.it - [fondazionergo.it](http://fondazionergo.it)

### 3.5 Regulatory obligations

In order to provide services requested, Data Controller may have to comply with regulatory obligations established by law and / or regulations national or Community related to them. In such cases, Data Controller will also process your personal data to fulfill these regulatory obligations.

For these treatments, the legal basis for processing is the need to comply with a legal obligation, in compliance with Article 6 (1) (c) GDPR. Therefore, the acquisition of your preventive consent to the treatment is not necessary. Your personal data processed for the time necessary for the fulfillment of regulatory obligations and, thereafter, exclusively kept for 10 years in compliance with the statute of limitations provided for by the Civil Code Italian.

### 3.6 Management of the Site

Your Personal data described in paragraphs 2.1 and 2.3 above will be processed by Fondazione Ergo to manage the Site, perform anonymous statistical analysis on the use of the site to check its correct functioning and / or to ascertain responsibility in case of hypothetical computer crimes against the Site. In any case, these data are processed anonymously and are deleted immediately after processing.

The legal basis of the processing is the legitimate interest of Fondazione Ergo to guarantee the correct use of the Site and to prevent any possible computer crime, in compliance with Article 6 (1) (f), GDPR. Therefore, the acquisition of your consent will not be necessary.

Your personal data will be immediately rendered anonymous and canceled at the end of your browsing session.

However, if information crimes are established, your personal data will be kept for the time necessary to manage the dispute. In any case, your personal data will be stored for a maximum period of 10 years from the termination of the contract, in compliance with the period of limitation provided by the Italian Civil Code.

## 4. Consequences of a refusal to provide personal data

The provision of personal data from time to time requested by Fondazione Ergo for the various services offered is necessary in order to offer the related service. Therefore, failure to provide such data will make it impossible for Fondazione Ergo to offer the specific service requested.

## 5. How will your personal data be processed?

Data processing is based on principles of correctness, lawfulness and transparency and can be performed either manually or with the aid of electronic means, or automated, with logic strictly related to the purposes indicated and, however, with suitable methods to ensure the security and confidentiality in accordance with the provisions of Article 32 GDPR.

Treatment activities include: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction of data. 6. To which subjects your personal data may be communicated and who can get to know them For the pursuit of the purposes described in paragraph 3 above, your personal data will be known by the employees, the assimilated staff and the collaborators of the Data Controller, who will operate as authorized persons to process personal data.

Furthermore, your personal data will be processed by third parties belonging to the following categories:

- subjects that Fondazione ERGO-MTM Italia uses for the provision of the services requested (for example, thirdparty entities for the performance of trainings, also in e-learning, certification, for the organization of events or other activities managed by Fondazione ERGO-MTM Italia);
- subjects that provide services for the management of the information system and for the storage of personal data processed;
- subjects that provide legal and / or tax advice;



**Fondazione Ergo-MTM Italia**

Via Albuzzi n.43 - 21100 Varese

Tel.+39 0332 239979 - C.F. 95074630120 - P.IVA 03286280122

fondazione@fondazionergo.it - [fondazionergo.it](http://fondazionergo.it)

d) authorities and supervisory and control bodies. The subjects belonging to the above categories operate, in some cases, in complete autonomy as separate data controllers, in other cases, as data controllers specifically appointed by the Data Controller in compliance with article 28 of the GDPR. 7.

What rights do you have as an interested party? In relation to the treatments described in this Informative note, as interested party you can, under the conditions established by the GDPR, exercise the rights established by articles 15 to 21 of the GDPR and, in particular, the following rights:

- **right of access** - Article 15 of the GDPR: the right to obtain confirmation that personal data concerning you is being processed and, in this case, obtain access to your personal data - including a copy thereof - and communication, among others, of the following information:

- a) purpose of the processing
- b) categories of personal data processed
- c) recipients to whom these have been or will be communicated
- d) data retention period or criteria used
- e) rights of the interested party (correction, deletion of personal data, limitation of processing and right to object to the processing
- f) the right to lodge a complaint
- g) the right to receive information on the origin of my personal data if they have not been collected from the person concerned
- h) the existence of an automated decision-making process, including profiling;

- **right of rectification** - Article 16 GDPR: right to obtain, without undue delay, the correction of inaccurate personal data concerning you and / or the integration of incomplete personal data;

- **right to cancellation (right to be forgotten)** - Article 17 GDPR: right to obtain, without undue delay, the cancellation of personal data concerning you when:

- a) data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;
- b) You have withdrawn your consent and there is no other legal basis for the processing;
- c) You have successfully opposed personal data processing; d) data were processed unlawfully;
- e) data must be deleted to fulfill a legal obligation;
- f) personal data have been collected with regard to the information society service offer referred to in Article 8 (1) of the GDPR.

The right of cancellation does not apply to the extent that processing is necessary for the fulfillment of a legal obligation or for the performance of a task carried out in the public interest or for the establishment, exercise or defense of a right in court;

- **right to treatment limitation** - Article 18 GDPR: right to obtain treatment limitation, when:

- a) interested party disputes the accuracy of personal data;
- b) processing is illegal and the interested party opposes the cancellation of personal data and requests instead that its use is limited;
- c) personal data are necessary for the interested party to ascertain, exercise or defend a right in court;
- d) interested party opposed the treatment, as indicated above, pending verification of the possible prevalence of the legitimate reasons of the data controller with respect to those of the interested party.

- **right to data portability** - Article 20 GDPR: right to receive, in a structured format, commonly used and readable by an automatic device, the personal data concerning you provided to Fondazione Ergo and the right to transmit them to another holder without impediments, if the treatment is based on consent and is



**Fondazione Ergo-MTM Italia**

Via Albuzzi n.43 - 21100 Varese

Tel.+39 0332 239979 - C.F. 95074630120 - P.IVA 03286280122

fondazione@fondazioneergo.it - [fondazioneergo.it](http://fondazioneergo.it)

done by automated means. Furthermore, the right to obtain that your personal data is transmitted directly by the Data Controller to another data controller if this is technically feasible.

- **right of opposition** - Article 21 GDPR: right to object, at any time, to the processing of personal data concerning you on the legitimacy of legitimate interest, including profiling, unless there are legitimate reasons for the Data Controller to continue the processing that prevails over the interests, rights and freedoms of the data subject or for the assessment, exercise or defense of a right in court.

- **right to revoke the consent given;**

- to **lodge a complaint** with the Authority for the protection of personal data, Piazza di Montecitorio n. 121, 00186, Rome (RM).

The above rights may be exercised against Fondazione Ergo, by contacting references indicated in the previous point 1. The Holder will take care of your request and provide you with a reply without undue delay and, however, at the latest within one month of receiving it.

The exercise of your rights as an interested party is free under Article 12 of the GDPR. However, in the case of manifestly unfounded or excessive requests, also due to their repetitiveness, Fondazione Ergo may charge a reasonable fee for the costs, as the administrative costs incurred to manage your request, or to deny its satisfaction. Finally, we inform you that Data Controller may request further information necessary to confirm your identity.



**Fondazione Ergo-MTM Italia**

Via Albuzzi n.43 - 21100 Varese

Tel.+39 0332 239979 - C.F. 95074630120 - P.IVA 03286280122

fondazione@fondazionergo.it - **fondazionergo.it**