

#### INFORMATION LETTER ON THE PROCESSING OF PERSONAL DATA

(Ex art. 13 – 14 EU reg. 2016/679 and Legislative Decree 196/2003 in the light of Legislative Decree 101/2018)

Dear Interested,

below we provide you with some information that you need to bring to your knowledge, not only to comply with the obligations set out by law, but also because transparency and fairness towards our customers are a fundamental part of our business.

The Data Controller of your personal data is **PALLADIO GROUP** identified according to the definition of "entrepreneurial group" established by art. 4.19 EU Reg. 679/2016 and responsible towards you for the legitimate and correct use of your personal data and who you can contact for any information or request at the following contact details:

# Data Controller: PALLADIO GROUP IN THE PERSON OF THE PARENT COMPANY PALLADIO GROUP SPA

Headquarters: Via Cresole n. 8, 36031 Dueville (VI), IT

Contacts and contact details:

Telephone	0444 947111
E-mail	info@palladiogroup.com
Website	www.palladiogroup.com

Data Protection Officer (DPO):

#### dpo@palladiogroup.com

**Data source:** data collected from the interested party and/or from third parties and/or from sources accessible to the public

Your personal data are collected and processed for the purposes set out below together with the legal basis of reference:

#### **PROCESSING: Courses and events**

Purpose	Data Processed	Legal basis	Duration
Organization and execution of courses and events	name, address or other elements of personal identification; email address; phone number and other contact details, occupation, role held in the company, resume, education.	Contract	10 years from the year of the course



**Categories of recipients:** Consultants and freelancers individually or in partnership; Banks and credit institutions, companies and societies instrumentally related to the indicated purpose.

### **PROCESSING: Accounting**

Purpose	Data Processed	Legal basis	Duration
Keeping of accounting records	Fiscal code and other personal identification numbers; Name, address or other elements of personal identification; economic, commercial, financial, insurance activities; Contact details (telephone number, email, etc.);	Legal obligation	10 years from the relevant year
Tax compliance	Fiscal code and other personal identification numbers; Name, address or other elements of personal identification; economic, commercial, financial, insurance activities; Contact details (telephone number, email, etc.);	Legal obligation	10 years from the relevant year

**Categories of recipients:** Consultants and freelancers individually or in partnership; Banks and credit institutions, companies and societies instrumentally related to the indicated purpose.

#### **Processing: Customer Management**

Purpose	Data Processed	Legal basis	Duration
Management of Customers	Fiscal code and other personal identification numbers; Name, address or other personally identifiable elements; Contact details (telephone number,	Contract	10 years from the year of termination of the last contract



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email, etc.)	

**Categories of recipients:** Consultants and freelancers individually or in partnership; Banks and credit institutions, companies and societies instrumentally related to the indicated purpose.

### **Processing: Marketing**

Purpose	Data Processed	Legal basis	Duration
Marketing (analysis and market surveys)	Fiscal code and other personal identification numbers; Name, address or other elements of personal identification; Economic, commercial, financial, insurance activities; Contact details (telephone number, email, etc.)	Consent	Until withdrawal of consent. The data will be kept for 10 years from the year in which the consent was revoked
Sending of informative and/or advertising material also by telephone or internet	Fiscal code and other personal identification numbers; Name, address or other elements of personal identification; Economic, commercial, financial, insurance activities; Contact details (telephone number, email, etc.)	Consent	Until withdrawal of consent. The data will be kept for 10 years from the year in which the consent was revoked

**Categories of recipients:** Consultants and freelancers individually or in partnership; firms and companies instrumentally related to the indicated purpose.

Consequences of lack of consent: personal data will not be processed for the specific purposes

## Processing: Audio-video photographic recordings and subsequent publication

Purpose Data Processed	Legal basis	Duration
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Recording by means of audio-video-photographic or photographic footage of the participants in the courses or events organized by the Data Controller	Photographs, video recordings and other multimedia content	Consent	Until withdrawal of consent. The data will be kept for 10 years from the year in which the consent was revoked
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**Categories of recipients:** Your data is intended for dissemination, by way of example it may be published on the internet, on the institutional site of the PALLADIO GROUP, on social networks attributable to the PALLADIO GROUP or video platforms (e.g.youtube).

Consequences of lack of consent: personal data will not be processed for the specific purposes

\* **Duration**: In addition to the time necessary for the accrual of the prescription terms in relation to reciprocal rights and the backup retention time.

#### \*

#### **CHANGES TO THIS PRIVACY POLICY**

The Data Controller reserves the right to make changes to this privacy policy at any time, notifying the interested parties. In case of non-acceptance of the changes made to this privacy policy, the interested party may request the Data Controller to remove their Personal Data. Unless otherwise specified.

#### \*

#### **DATA TRANSFER OUTSIDE EU**

The processing of personal data (e.g. storage, archiving and conservation of data on its own servers or in the cloud) will be limited to the areas of circulation and processing of personal data in countries belonging to the European Union, with the express prohibition of transferring them to countries outside the EU that do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protection instruments provided for by EU Regulation 2016/679 (third country deemed adequate by the European Commission, group BCR, model contractual clauses, consent of interested parties, etc.).

\*

In addition to this information, to ensure that your data is processed as correctly and transparently as possible, you must be aware of the fact that:

 Except for the purposes based on consent, the provision of your data is a necessary requirement, otherwise it will not be possible to supply the goods or provide the requested service;



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- you have the right to ask the data controller to access your personal data and to rectify or cancel them or limit their processing or to oppose their processing;
- if you have given consent for one or more specific purposes, you have the right to revoke this consent at any time;
- you have the right to lodge a complaint with the following Supervisory Authority: Guarantor for the protection of personal data;
- the data will be processed using automated, semi-automated and non-automated methods.

Where required by this information letter, you have a legal obligation to provide your data otherwise you are subject to sanctions as required by law.

Dueville, 26/04/2022

Signature of the Data Controller

**PALLADIO GROUP** 

#### **DISCLAIMER FOR ADULTS**

(Granting rights to use multimedia content)

(PLACE)	( DATE)
The Undersigned(NAME AND SURNAME OF THE PHOTOG	
Street City City	Region
Born in on	

pursuant to art. 10 code civ., of the articles 96 and 97 law No.633/1941 on copyright and articles 13 and 23 of the EU Reg 2016/679 on the protection of personal data, with this

#### **AUTHORIZES**

The use, reproduction, publication and dissemination by any technical means of audio/video recordings and images (hereinafter multimedia material) by and on behalf of:

#### PALLADIO GROUP IN THE PERSON OF THE PARENT COMPANY PALLADIO GROUP SPA

The installation and use of the multimedia material are granted completely free of



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#### charge.

The multimedia material may be used throughout the world and in all fields (exhibitions, competitions, screenings, internet, advertising, editions, press) in full or partial form.

It also prohibits its use in all cases that jeopardize the honour, reputation and decorum of one's person, pursuant to art. 97 law No. 633/41 and art. 10 of the Civil Code.

Pursuant to art. 98 law No. 633/41 and in compliance with the sentence of the Court of Cassation No. 4094 dated 6/28/1980, the multimedia contents (source digital files and/or film negatives) are understood to be the property of

#### PALLADIO GROUP IN THE PERSON OF THE PARENT COMPANY PALLADIO GROUP SPA

This disclaimer has unlimited validity and is drawn up and signed in full in two copies, guaranteeing that you have read this document and understood its content. One copy is retained by the filmed subject and the other is delivered to

#### PALLADIO GROUP IN THE PERSON OF THE PARENT COMPANY PALLADIO GROUP SPA

INTERESSTED PARTY (legible signature)	
PALLADIO GROUP SPA	
	DECLARATION OF CONSENT
The undersigned	
Name and Surname	
Fiscal Code	<del></del>
Place of birth and Date of b	rth

I have received, read and understood the information relating to the use of my personal data (pursuant to Article 13 of the 2016/679 European Regulation), by the Data Controller of my personal data (**PALLADIO GROUP** in the person of the parent company **PALLADIO GROUP SPA** identified according to the definition of "entrepreneurial group" established by article 4.19 of EU Regulation 679/2016) according to the purposes set out below:

Fulfillment of tax and accounting obligations; Customer management; direct marketing;



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Marketing (analysis and market surveys)

Having acknowledged that the processing of my personal data is necessary:

- for the execution of a contract of which I am a part or the execution of pre-contractual measures adopted at my request
- to fulfill a legal obligation to which the data controller is subject

in relation to the purposes listed below, for which my consent is not required: Customer management; Fulfillment of tax and accounting obligations
Having acknowledged my right to revoke my consent at any time, I consent to the processing of my personal data by the Data Controller, for the purposes set out below (Article 7 of Regulation 2016/679).

In relation to the processing of my personal data, for the following purpose:

Direct Marketing

I ACCEPT

Date and Place

Signature

I am aware that in the absence of consent the consequences are as follows:
In case of lack of consent, the interested party will not be sent advertising material

In relation to the processing of my personal data, for the following purpose:

Marketing (market analysis and surveys)

In relation to the processing of my personal data, for the following purpose:



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# Audio-video-photographic recordings

I ACCEPT	I DON'T ACCEPT
Date and Place	Signature