

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

(art. 13 and 14 Reg. UE 2016/679 and Legislative Decree 196/2003 and subsequent amendments)

Dear,

Below we provide you with some information that you need to bring to your attention, not only to comply with legal obligations, but also because transparency and fairness towards interested parties are a fundamental part of our activity.

**Who is the data controller?**

The Data Controller of your personal data, responsible towards you for the legitimate and correct use of your personal data, is **PALLADIO GROUP**, in the person of the parent company Palladio Group S.p.A. (identified according to the definition of "entrepreneurial group" set out in art. 4.19 of EU Regulation 679/2016), which you can contact for any information or request at the following **addresses**:

Head office	Via Cresole n. 8, 36031 Dueville (VI), IT
Telephone	+39 0444 947111
E-mail	info@palladiogroup.com
Web site	www.palladiogroup.com

**Who is the Data Protection Officer?**

The data controller has appointed a Data Protection Officer (DPO) who can be contacted at the following address:

E-mail	dpo@palladiogroup.com
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**Where are the data collected?**

Your data is communicated by you and/or by third parties and/or collected from publicly accessible sources.

**Is there an obligation to provide data?**

Except for purposes based on consent, the provision of your data is a necessary requirement: failure to provide the data indicated as mandatory could lead to legal and contractual consequences while failure to provide the data indicated as optional could make it impossible to carry out the processing or lead to a partial processing thereof. Therefore, in case of failure to provide them, you may not obtain the expected result or obtain it only partially.

**For what purposes are the data collected and processed?**

The Data Controller collects and processes your personal data with automated, semi-automated and non-automated methods for purposes related to the organization and management of courses and events, which is lawful on the basis of the execution of the contract, a legal obligation, the legitimate interest of the data controller or of third parties or of your consent. The table below shows the data processing analytically with details on the purpose, legal basis, type of data, specific recipients and cancellation terms.

**To whom are the data communicated?**

As part of the processing activities, your data may be communicated to:

- authorized subjects, as identified in the specific register kept by the Data controller, therefore employees and other internal subjects,
- external parties who process the data on behalf of the Data Controller, duly instructed and bound through contracts of appointment as data processor (as identified in the specific register kept by the data controller),
- other organizations belonging to the entrepreneurial group,
- public authorities at their request or due to communication obligations incumbent on the data controller,
- other subjects for whom the communication of data is necessary for carrying out the declared purposes of the data controller, as per the specifications for each processing in the table below.

### How is the data stored?

Your personal data is stored securely in compliance with the cancellation terms identified and reported below. However, consider that the data may be retained for the time necessary for the statute of limitations to accrue in relation to mutual rights and the retention time of backups.

### Are the data subject to transfer?

The processing of personal data (e.g. storage, archiving and conservation of data on its own servers or in the cloud) is limited to the areas of circulation and processing of personal data in countries belonging to the European Union, with an express prohibition on transferring them to countries non-EU which 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, consensus of interested parties, etc.). You can request more information by contacting the data controller.

### What rights can be exercised?

You have the right to ask the data controller for access to your personal data and for the rectification, cancellation and portability of the same or the limitation of the processing that concerns you or to oppose their processing.

If you have provided consent for one or more specific purposes, you have the right to revoke this consent at any time, without prejudice to the lawfulness of the processing based on the consent given before the revocation.

You also have the right to lodge a complaint with the following Supervisory Authority: Guarantor for the protection of personal data, with headquarters in Piazza Venezia 11, 00187 – Rome – [protocollo@pec.gdpd.it](mailto:protocollo@pec.gdpd.it).

To exercise your rights or to request additional information, you can contact the data controller via the contact information above.

### Can the information in this policy change?

The Data Controller may update this information on personal data in accordance with applicable laws. Any changes will be communicated appropriately and the update date will always be visible in the information. It is suggested that you regularly check the information and, if necessary, request an updated copy from the Data Controller.

### Tab. A

#### What specific data processing is carried out?

Processing	Courses and events
<b>Purpose</b>	Organization and delivery of courses and events Management of special dietary needs
<b>Legal Basis</b>	Article 6, par. 1, letter. b): Execution of the contract or pre-contractual measures Article 9, par. 2, letter. a): Consent of the interested party
<b>Data processed</b>	Common data (in particular: Personal data Contact data Data relating to work activity (role held in the company, CV, performance, professional quality certificates, ...) Special dietary needs
<b>Specific recipients</b>	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller, including exhibitions and events organizers
<b>Storage</b>	10 years from the year of the course

<b>Processing</b>	<b>Audio-video photographic recordings and subsequent publication</b>
<b>Purpose</b>	Recording by means of audio-video-photographic or photographic recordings of participants in courses or events organized by the Data Controller
<b>Legal Basis</b>	Article 6, par. 1, letter a): Consent of the interested party
<b>Data processed</b>	Common data (in particular: Photographs, video recordings and other multimedia content)
<b>Specific recipients</b>	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller. Your data is intended for dissemination, for example it may be published on the internet, on the institutional website of PALLADIO GROUP, on social networks attributable to PALLADIO GROUP or video platforms (e.g. YouTube).
<b>Storage</b>	Except for the data subject to dissemination, the data will be kept for 10 years from the year in which consent was revoked

<b>Processing</b>	<b>Marketing</b>
<b>Purpose</b>	Market analysis and research; Sending information and/or advertising material also by telephone or internet; Sending personalized communications based on the user's interest
<b>Legal Basis</b>	Article 6, par. 1, letter a): Consent of the interested party
<b>Data processed</b>	Common data (in particular: Personal data Data relating to identification codes Contact details Address data Data relating to purchases or use of services Data relating to work activity (role held in the company, CV, performance, professional quality certificates, ...)
<b>Specific recipients</b>	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller
<b>Storage</b>	Until consent is revoked. The data will be stored for 10 years from the year in which consent was revoked.

<b>Processing</b>	<b>Reception</b>
<b>Purpose</b>	Monitoring of people entering the company; Filtering of phone calls; Documentation sorting
<b>Legal Basis</b>	Article 6, par. 1, letter. f): Pursuit of the Data Controller's legitimate interest in the protection of company assets/worker safety/for organizational and production needs
<b>Data processed</b>	Common data (in particular: Personal data Data relating to identification codes Contact data Address data Data relating to work activity (role held in the company, CV, performance, professional quality certificates, ...)

<b>Specific recipients</b>	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller
<b>Storage</b>	1 year from the year of obtaining data

<b>Processing</b>	<b>Customers Management</b>
<b>Purpose</b>	Customer management Follow up on customer or potential customer requests and manage pre-contractual or contractual obligations
<b>Legal Basis</b>	Article 6, par. 1, letter b): Execution of the contract or pre-contractual measures
<b>Data processed</b>	Common data (in particular: Personal data Data relating to identification codes Contact details Address data Payment details Data relating to purchases or use of services Data relating to work activity (role held in the company, CV, performance, professional quality certificates, ...)
<b>Specific recipients</b>	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller, including banks and credit institutions
<b>Storage</b>	10 years from the year in which the effects of the last contract ceased

<b>Processing</b>	<b>Accounting</b>
<b>Purpose</b>	Accounting record keeping; Tax obligations
<b>Legal Basis</b>	Article 6, par. 1, letter c): Fulfillment of a legal obligation
<b>Data processed</b>	Common data (in particular: Personal data Data relating to identification codes Contact details Address data Payment details Salary data economic, commercial, financial and insurance activities
<b>Specific recipients</b>	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller, including banks and credit institutions
<b>Storage</b>	10 years from the year of competence

<b>Processing</b>	<b>IT systems management and maintenance</b>
<b>Purpose</b>	Management and maintenance of the network and IT systems
<b>Legal Basis</b>	Art. 6, par. 1, letter f): Pursuit of legitimate interest of the Data Controller Article 6, par. 1, letter c): Fulfillment of a legal obligation limited to the provisions of the legislation regarding system administrators

<b>Data processed</b>	Common data (in particular: Personal data Contact details Data relating to the provision of an electronic communications service (traffic data, data relating to internet browsing, other...) Access and identification data (username, password, customer ID, other...)
<b>Specific recipients</b>	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller
<b>Storage</b>	10 years from the year of termination of the contractual relationship for accounts, passwords and user names; 18 months with regards to obligations regarding system administrators;

<b>Processing</b>	<b>Defense of the interests and rights of the Data Controller</b>
<b>Purpose</b>	Prevent and/or detect any abuse and defend the rights and interests of the Data Controller
<b>Legal Basis</b>	Art. 6, par. 1, lett. f): Pursuit of legitimate interest of the Data Controller to protect its rights and interests in court or in the preparatory phases for its possible establishment Art. 9, par. 1, letter f): ascertainment, exercise or defense of a right in court
<b>Data processed</b>	Common data, special categories of data and judicial data (in particular: Data useful for the defense of the interests and rights of the Data Controller)
<b>Specific recipients</b>	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller, including legal ones
<b>Storage</b>	The data will be stored as long as the Data Controller has an interest in exercising his own right or interest

<b>Processing</b>	<b>Management of obligations regarding personal data protection</b>
<b>Purpose</b>	Obligations regarding the protection of personal data
<b>Legal Basis</b>	Article 6, par. 1, letter c): Fulfillment of a legal obligation
<b>Data processed</b>	Common data and special categories of personal data
<b>Specific recipients</b>	Authorized as identified in the register of authorized parties Data processors as identified in the register of data processors Other subjects for whom the communication of data is necessary for the purposes of carrying out the declared purposes of the Data Controller, including public authorities
<b>Storage</b>	10 years from the year of cessation of the effects of the contract or from the last request

Last update: 16/09/2024

**PROVISION OF CONSENT**

I, the undersigned

Name and Surname \_\_\_\_\_

Place of birth \_\_\_\_\_

Date of birth \_\_\_\_\_

Have received, read and understood the information relating to the use of personal data in relation to the management of courses and events, having taken note of my right to withdraw consent at any time, in relation to the processing of my personal data for the following purposes of processing personal data:

Marketing (market analysis and research):  
Sending informative and/or advertising  
material also via telephone or internet

I ACCEPT

I DO NOT ACCEPT

Sending personalized communication based  
on the user's interests

I ACCEPT

I DO NOT ACCEPT

Place and date \_\_\_\_\_ Signature \_\_\_\_\_