



G.D.P.R.
Privacy Policy
Skychildren ETS Foundation
pursuant to European Regulation 2016/679



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1. PRIVACY POLICY AND LEGAL BASIS

Dear Madam, Dear Sir, in thanking you for your interest in the activity of Skychildren ETS Foundation, we inform you that the processing of personal data concerning you is governed by the European Regulation 2016/679 on Data Protection (hereinafter G.D.P.R.) and pursuant to the Council of 27 April 2016 for the protection of natural persons and the free movement of personal data.

The legal basis of reference for the collection of data and the drafting of the Register of Processing is composed of the tax legislation of non-commercial entities, the rules of the Civil Code and the provisions of the Third Sector Code.

In accordance with the G.D.P.R., we provide you with the following information:

- **personal data means any information relating to an identified or identifiable natural person;**
- **"processing" means any operation, or set of operations, carried out on personal data with or without the aid of electronic tools.**

2. DATA CONTROLLER

Pursuant to the GDPR and Art. 28 of Legislative Decree no. 196 of 30 June 2003, the Board of Directors of the Association recognizes that the Data Controller is Skychildren ETS Foundation, hereinafter the Foundation, with registered office in Monza, via Tommaso Grossi n. 6 - 20900 Monza (MB) - C.F.94621150153, since it decides in what way and for what reasons, communicated in the specific information, collect and use the personal data you provide to us, and collect and use the personal data provided by the user, as well as with what tools to process them and what security procedures to activate to ensure their integrity, confidentiality and availability.

The Data Controller shall put in place appropriate technical and organizational measures to ensure that the processing is carried out in accordance with the Regulation.



Domiciliation for the office: the company books are kept at the registered office of the Association, in via Tommaso Grossi 6 - 20900 Monza (MB).

Contact details: info@skychildren.org.

The Foundation ensures that relations with third parties provide sufficient guarantees, with the implementation of appropriate technical and organizational measures and that the processing meets the requirements of the Regulation and guarantees the protection of the rights of the Data Subject.

3. PURPOSE OF THE PROCESSING

All the activities of collection and subsequent processing of your data are aimed at pursuing the institutional purposes of the Foundation through:

- o contact activities (sending newsletters, contacts via email or telephone, etc.);**
- o donation management;**
- o processing of volunteers' data **for their insurance coverage****

in addition to the related administrative, civil and tax obligations and the legal obligations that the Data Controller must comply with. The data you are asked to provide are those necessary for the performance of these activities.

4. PROVISION AND PROCESSING OF DATA

For the above-mentioned purposes, the data concerning you are the personal data necessary for contact and donation collection activities (name, surname, postal and email address, bank details received on the occasion of donations, tax code, etc.) and can be provided by you directly or by supporters and volunteers of the Foundation; Such personal data may be:

- o or processed by specially appointed internal staff. The knowledge of each of the above-mentioned subjects will be limited to the data necessary for the performance of their respective tasks;**
- o or communicated to third parties who are recipients by law or regulation; communicated, in case of request, to the police or to the judicial authority.**

The provision of data is optional, however they are essential for the performance of the activities illustrated in point 3; therefore, failure to provide the data will make it impossible to carry out these activities.

The Association, in compliance with Article 5. of the G.D.P.R., will acquire and



process the data collected according to the following criteria and principles:

- **Awareness**
- **Transparency**
- **Lawfulness and Fairness**
- **Minimisation, relevance and proportionality**
- **Limitation of Retention**
- **Security & Integrity**

In the event that personal data is forwarded to Skychildren ETS Foundation that is not required or not necessary for the fulfilment of the purposes indicated in point no. 3, the said Foundation cannot be considered the owner of these data and will delete them as soon as possible and in the manner deemed most appropriate. The Foundation does not adopt any automated decision-making process, including profiling, as per art. 22, paragraphs 1 and 4, of EU Regulation no. 679/2016.

5. DATA RETENTION

Your data will be stored on computer and paper media with logics related to the purposes for which they were collected and in compliance with current security regulations. The Foundation will not use the data provided for purposes other than those related to the service to which the user has subscribed, they will not be communicated for other purposes nor, even less, disseminated.

The retention period of personal data is:

- **to send newsletters, until you express your wish to no longer wish to receive them;**
- **for donations, until the end of the relationship established and for the time required by applicable regulations, with particular reference to administrative, civil and tax regulations.**

The Foundation will keep among its data the address book already acquired for its institutional purposes and acquired in compliance with Legislative Decree 196/2003. Although it does not carry out the provisions of art. 130 of the Privacy Code, in accordance with the e-privacy Directive 2002/58, the Association will attach an information notice to the names already on file with an OPT-OUT option; in any other case of initiatives in accordance with the provisions of art. 130 Privacy Code in accordance with the e-privacy Directive 2002/58, the Association will use the OPT-IN procedure.



6. RIGHTS OF THE DATA SUBJECT

The interested party may at any time exercise the rights provided for by the above-mentioned Regulation: access to personal data (Art. 15), rectification (Art. 16) or cancellation of the same (Art. 17), limitation (Art. 18) or opposition to processing (Art. 21).

- The data subject has the right to withdraw consent at any time, without affecting the lawfulness of the processing carried out up to that point.
- The interested party has the right to lodge a complaint with the Guarantor for the protection of personal data (Art. 77) in the event that he/she becomes aware of unlawful processing of his/her data.
- The user also has the right, at any time, to request removal from the list of registered users in order to no longer receive any services or information. To obtain cancellation, the user can direct a request to info@skychildren.org or, upon receipt of communications, can select the "Unsubscribe" option. The Association undertakes to delete the user from the aforementioned list within 48 hours of receipt of the request.

7. SECURITY OF PERSONAL DATA

The Foundation adopts appropriate and preventive security measures to safeguard the confidentiality, integrity, completeness and availability of personal data, both in paper and electronic form. As established by the regulatory provisions governing the security of personal data.

Technical, logistical and organizational measures have been developed with the aim of preventing damage, loss, including accidental loss, alteration, improper and unauthorized use of data concerning you, including back-ups of computer data, as better specified in the Data Processing Register.

The Foundation provides users with a link to server and data security information from the provider MAILCHIMP (newsletter provider):
<https://mailchimp.com/legal/privacy/>

This Privacy Policy is made available at each point of collection of personal data (website, newsletter subscription form).

