

ORSOLINA28 GROUP

MOP

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PRIVACY POLICY WEBSITE AND DIGITAL SERVICES

(JOINT OWNERSHIP PURSUANT TO ART 26 OF THE GDPR)

This information is provided pursuant to articles 12,13 and 14 of Regulation (EU) 27 April 2016 n. 679 hereinafter «GDPR» for all processing of personal data carried out by web services connected to the domains owned by the Orsolina28 Group [Orsolina28 Art Foundation](#) - [Bio28](#)

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1 WHO IS THE DOCUMENT ADDRESSED TO

The following information is aimed at all people who consult or use the services provided through the Orsolina28 Group websites. In particular:

- General users of our institutional websites
- Customers and participants in events, shows and courses
- Users who wish to use hospitality services
- Users interacting with social media
- Performing artists
- Users who use the platforms included in the websites

2 JOINT CONTROLLERS OF THE TREATMENT

For the purposes declared in this information, the following companies (hereinafter collectively «Orsolina28 Group») operate on your personal data as joint data controllers pursuant to art. 26 of the GDPR:

Owner 1

ORSOLINA 28
ART FOUNDATION

ORSOLINA28 ART FOUNDATION ETS
Via Caminata, 28 - 14036 Moncalvo (AT)
C.F. 12269250010
PEC: orsolinaartfoundation@legalmail.it
Tel. +39 0141.917277

Responsible
Data Protection
privacy@bio28.it

Owner 2

Village28
(Bio28)

VILLAGE28 s.r.l.
Via Caminata, 28 - 14036 Moncalvo (AT)
C.F. / P.IVA 01646420057
PEC: orsolina@legalmail.it
Tel. +39 0141.917277

Responsible Data
protection privacy@bio28.it

Owner 3

Scuola28 SSDRL
(Bio28)

SCUOLA28 s.s.d.r.l.
Via Caminata, 28 - 14036 Moncalvo (AT)
C.F. / P.IVA 01610380055
PEC: orsolina28ssdrl@pec.it
Tel. +39 0141.917277

Responsible
Data Protection
privacy@bio28.it

Owner 4

Orsolina Società
Agricola Semplice
(Bio28)

ORSOLINA SOCIETA' AGRICOLA SEMPLICE
Via Caminata, 28 - 14036 Moncalvo (AT)
C.F. / P.IVA 01444100059
PEC cascinaorsolina@pec.coldiretti.it
Tel. +39 0141.917277

Not Named

2.1 DATA PROTECTION OFFICER - DPO

The companies of the Orsolina28 Group, as well as all the companies with which we stipulate joint ownership agreements (art.26 GDPR) or responsibility (art.28 *GDPR*) on the services offered, have always been very attentive to the security of the information processed, with particular regard to information that may contain personal data or particular categories of personal data.

For this reason, in order to always guarantee maximum compliance with current legislation, the Orsolina28 Group has designated a Data Protection Officer (RPD) or Data Protection Officer (DPO) pursuant to art. 37 of the GDPR.

You can contact the Data Protection Officer directly via the following email address: privacy@bio28.it.

2.2 JOINT CONTROLLERS OF THE TREATMENT

The companies of the Orsolina28 Group offer services and products through their spaces and websites. Specific agreements are stipulated between the companies of the group regarding the purposes of collection and methods of processing of personal data. The Orsolina28 Group companies are limited to these agreements and will operate on your personal data as Joint Data Controllers pursuant to art. 26 of the GDPR. In particular, joint ownership of the processing concerns the personal data you voluntarily provide in order to purchase the services offered or products listed in this document.

2.3 FURTHER INFORMATION ABOUT THE JOINT OWNERS

Regarding the processing of your personal data, the companies Orsolina28 Art Foundation ETS and Bio28 are mainly responsible towards users in relation to the products and/or services offered on their website on behalf of the Orsolina28 Group companies.

However, we inform you that in accordance with current laws, you can exercise your rights under the GDPR towards and against each data controller (ORSOLINA28 GROUP company).

Without prejudice to the possibility of contacting the Data Controllers or Data Protection Officers (DPO) directly, in case you, as a user and "interested" subject, need any clarification regarding the processing of your personal data or how to exercise your rights, you can contact our DPO at the following address: e-mail: privacy@bio28.it.

We inform you that you can find the essential contents of the joint ownership agreements in the annexes of this document.

3 WHAT WE USE YOUR PERSONAL DATA FOR (PURPOSE)

3.1 F1 - PROVIDE THE DIGITAL SERVICES YOU REQUEST

Depending on your requests, this includes our commitment to use your personal data to:

- allow you to browse our websites freely;
- allow you to access the contents of our institutional or service sites;
- allow you access to platforms to book and purchase shows;
- allow you access to platforms to book and purchase intensive courses, masterclasses and workshops;
- allow you access to the platforms to book your stay at our residences;
- allow you access to restaurant booking platforms;
- allow you to participate in our courses;
- allow you access to the platforms to propose a “Call for Creation” project;
- allow you to complete the online purchase of our products and services;
- guarantee you access to reserved areas or applications;
- allow you to make payments to use the provided services;
- allow you to make donations.

Furthermore, as part of the provision of the services requested by you, we may have to process your data personal for:

- create and manage your User Account and related authorization profile on our systems;
- manage the relationship with you regarding your Account regarding the services to which you have obtained access.

Why we may process your personal data for these purposes

The processing of your personal data is necessary in order to allow us to fulfill our contractual or pre-contractual obligations linked to the provision of the services requested by you. This processing is permitted and carried out pursuant to the **art. 6.1 letter b) of the GDPR**.

Learn more

If as a User you do not wish to provide the personal data we need for the execution of the service contract or for the fulfillment of an obligation established by law in relation to the service offered, this will make it impossible for us to satisfy your request. For example, if you do not provide us with your details or contact information, we will not be able to process your order and allow you to use the products or services you request.

For more information regarding your rights, please consult the **paragraph 10 (User Rights)**.

Note

When the provision of the services requested by you involves the products and/or services of the Orsolina28 Group companies the data will be processed jointly with the latter.

3.2 F2 - IMPROVING THE USER EXPERIENCE AND ENSURE THE SECURITY OF THE SERVICES

We use personal data to provide you with increasingly better services and products in order to best satisfy your User experience. This includes, for example:

- do everything necessary to provide our products and services to you as a user;
- ensure that your account is adequately protected;
- ensure that our website, network and ICT infrastructure are secure and used appropriately;
- better understand how our products, services and website are used and make improvements;
- research and analyze desired products and services;
- adapt our content so that it is more relevant to you;
- ensure the safety of our business and our partners;
- develop and maintain relationships with suppliers, partners, other companies and the people who work for them;
- manage sites and services during routine maintenance operations, including troubleshooting and to understand any errors encountered during their use;
- maintain an adequate level of security and to manage and administer our IT systems in order to correctly configure network protocols, allow the display of screens, contents and protect the services from viruses, malware, harmful software and unauthorized access;
- investigate any complaints and provide customer assistance;
- investigate any complaints brought by you or third parties and to provide you with a more efficient support service;
- ensure the quality and effectiveness of our handling of complaints or user support requests;
- defend or enforce our rights or those of a third party.

Because we may process your personal data for these purposes

We process your personal data for these purposes because we believe that it is our legitimate interest to do so pursuant to and for the purposes of **art. 6.1 letter f) of the GDPR**.

Learn more

Pursuant to art. 21 of the GDPR, as an interested party you can object to the processing of your personal data for these purposes. However, the Orsolina28 Group companies will refrain from further processing your personal data only if they are unable to demonstrate the prevalence of their legitimate interest over yours.

We process your personal data for these purposes because we believe that it is our legitimate interest to do so pursuant to and for the purposes of **art. 6.1 letter f) of the GDPR**.

3.3 F3 – COMPLY WITH LEGAL OBLIGATIONS AND MAKE MANDATORY COMMUNICATIONS

We may need to process your data in order to comply with specific legal obligations or to carry out the necessary communications in response to requests that we are legally required to satisfy, such as, for example, meeting tax obligations, communicating your data upon request of a competent governmental or jurisdictional authority (e.g. revenue agency, MIUR, law enforcement or judicial authority).

Why we may process your personal data for these purposes

The processing of your personal data is necessary to comply with a legal obligation to which we are subject and is authorized pursuant to the **art. 6.1 letter c) of the GDPR**

3.4 F4 - PROMOTE ACTIVITIES, PRODUCTS AND SERVICES OF THE Orsolina28 Group (NEWSLETTER)

If when you fill out our registration forms for the services offered you give us your consent or sign up to our "newsletter" we may use the data you provide for marketing purposes in order to send updates or other communications that we believe may be useful for your interest. In particular, depending on the consent you wish to provide us, we may promote activities, products and services in the following ways:

Direct Marketing: we will use your data to communicate with you and to keep you updated on the Orsolina28 Group's activities and provide you with suggestions and recommendations about events, activities, projects, products or services that may be of interest to you. We will provide you this information through the contact details voluntarily provided by you and authorized by you (e.g. via e-mail).

We may also use your personal contact details, preferences, suggestions and any other relevant information you may provide to us to provide you with more relevant information. Such data may also be used in aggregate and/or anonymous form to conduct satisfaction surveys.

How we use your personal data in the NEWSLETTER service

The data will be managed through registration on our CRM portal and will be sent via the Mail Chimp newsletter service (<https://www.mailchimp.com/>).

Subscription can be canceled at any time via the link at the bottom of any communication we send.

Why we may process your personal data for these purposes

The processing is authorized by your free consent pursuant to the **art. 6.1 letter a) of the GDPR**.

For example, in addition to the newsletter service, we may ask for your consent when we use technologies such as cookies or use images of you in our publications.

Learn more

You have the right to withdraw consent at any time without prejudice to the lawfulness of the processing carried out before the revocation. For more information regarding your rights, please consult the **paragraph 10 (User Rights)**.

3.5 F5 - SOFT-SPAM

If you have not already rejected this possibility, when the conditions set out in the art. 130 paragraph 4 of the Legislative Decree. 30 June 2003, n. 196, we may send you commercial communications to offer you services or products similar to those you have already used or purchased. This activity (so-called "Soft Spam") bases its lawfulness on our legitimate interest (art. 6.1 letter f of the GDPR) to directly promote products and services to our customers, as they are already users of products or services similar to those we intend to promote. Soft-Spam can be carried out even if you have not given your consent, using the information you have given us to purchase a product or use a service. It is your right to oppose this treatment.

With regard to the previous points, we inform you that you can object at any time to the receipt of information of a commercial nature, including Soft-Spam, by contacting us through the contact information we have provided you or simply by selecting the option to refuse to receive further communications commercial information always present at the bottom of our communications (e.g. e-mail).

3.6 F6 - COOKIES AND OTHER SIMILAR TECHNOLOGIES

As previously stated, we automatically collect data through the use of "cookies".

Some of our website pages use cookies to offer you a better service during subsequent uses of the website. You can set your browser to receive a notification before receiving a cookie, so that you can decide whether to accept it or not. You can also set your browser to disable cookies; however, if you do this, some of our websites may not work properly and forget your settings (e.g. selected language).

In order to guarantee compliance with the consent and information requirements established by current legislation, we use some technologies for tracking, monitoring and real-time control of cookies and your consent to their use. Updated and detailed information on the components in action on our sites is available in the respective cookie policies linked in the footers of our websites.

We also use technologies to track the reading of our emails to monitor the users subscribed to the newsletter service and verify the contents preferred by each User, in order to send personalized information. Furthermore, this system helps us understand if your email address is still active and if our emails are read.

3.7 F7 – E-COMMERCE

If you purchase products or services through our websites (e.g. <https://www.orsolina28.it/>; <https://www.bio28.it/>) your personal data, also to finalize the supply contract (see purpose **F1**), will be used to manage payments and fulfill related tax obligations.

For more information on these treatments you can consult the CUSTOMER INFORMATION (**INF- MOP.02**) of the Orsolina28 Group company from whom you purchased the product or service. These treatments are carried out by the individual companies of the Orsolina28 Group as independent data controllers pursuant to art. 4.7 of the GDPR. Customer information from Orsolina28 Group companies are available at the following url: <https://www.bio28.it/it/privacy> .

3.8 F8 - SOCIAL NETWORK

The companies of the Orsolina28 Group also promote their business through social media in order to develop the brand and make their products and/or services known. The personal data that you wish to provide us voluntarily through our profiles on social channels will be used by the Orsolina28 Group companies exclusively for the purposes set out in this paragraph and in compliance with the Social Media service regulations.

In this regard, the Group companies may carry out promotional communications to you, using the contact details of your social profile, regarding products or services advertised on a page or in a post of which you have become a "fan" or if you have registered with a "group" of followers of one of our companies or one of our products or services, thus deciding to "follow" the related events, news or comments. In fact, it is believed that in this way you also wanted to express your desire to give your consent to receiving promotional messages from us regarding the services and products in which you have expressed interest.

4 CATEGORIES OF PERSONAL DATA PROCESSED

4.1 COMMON DATA VOLUNTARILY PROVIDED

This data is processed for the following purposes:

	F1	F2	F3	F4	F5	F6	F7	F8
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As a User, you can voluntarily provide us with your personal data, including those that allow your identification, when consulting our institutional sites or using the web services associated with them. In particular, this happens when you contact us to obtain information, when you register for our services or when you fill out our forms (Forms) on the relevant pages.

As a User you may choose to provide us with additional information when you contact us or otherwise interact with us. We collect your personal data when you communicate with us in person, using the contact information we have provided to you through our websites or by any other means.

If you are a regular User of our website or would like to access specific services, you may have to create a User Account ("Account"). The information provided during the setup of the Account depends on the service and may include the name, surname, e-mail address, reference contact, contact details and other data useful for configuring the service according to your reasonable expectations and to direct our products or services towards your interests. If you register to create an Account, you will be able to create a unique password that will allow you to access your Account in order to use our services and manage your personal information independently (so-called User profile).

If you sign up for our newsletter or other forms of direct communication from us, it may be necessary to provide us with your name, email address or other specific data declared from time to time.

4.2 DATA COLLECTED AUTOMATICALLY BY OUR SYSTEMS

In addition to the common data that you wish to provide us directly and intentionally as a User, the computer systems and software procedures used to operate our websites and services acquire, during their normal operation, some data whose transmission is implicit in the use of Internet communication protocols. When you visit our website, we may automatically collect so-called "navigation data". By way of example but not limited to: IP address, login data, browser type and version, browser plug-in types and versions, operating system and platform, data relating to your visit, including the Clickstream URL through and from our website, products viewed or searched for, downloads made, times and duration of visits to certain pages and page interaction, session or system errors.

In some cases, we also collect navigation data through "cookies" or similar technologies. In these cases, if the legal conditions are met, you will always be informed in advance via a specific banner, through which you can express your consent to the use of Cookies. For more information on this matter, consult the cookie policy found at the bottom of each of our websites.

We also collect navigation data through our security systems (for example Antivirus and Firewall) during your browsing on our web pages or the your use of our cloud applications.

This data is processed for the following purposes:

	F1	F2	F3	F4	F5	F6	F7	F8
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4.3 DATA RECEIVED FROM OUR PARTNERS OR OTHER SOURCES

We may receive data relating to you from other sources. This happens if you use any external service, offered by one of our partners or third parties, to which we are registered. In particular:

we may receive your data from event promotion and management platforms following your registration for an event organized by us or one of our partners;

we may receive your personal information from ticketing, e-commerce or online payment management platforms;

we may receive your contact details from our "Artists/Partner" and contact you on their behalf in order to promote their initiatives.

We inform you that we also work closely with third parties (including, for example, technological, commercial partners, technical, payment, delivery services or analysis service providers) and, if the contractual conditions are met, we may receive data from them relating to your person (including data that is publicly available).

This data is processed for the following purposes:

	F1	F2	F3	F4	F5	F6	F7	F8
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4.4 SPECIAL CATEGORIES OF DATA:

The companies of the Orsolina28 Group do not deliberately collect particular categories of personal data (ex art. 9 of the GDPR) through their websites or web services.

This data is processed for the following purposes:

	F1	F2	F3	F4	F5	F6	F7	F8
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5 FURTHER INFORMATION ON LINKS TO OTHER WEBSITES

Where we provide links to other websites, not belonging to Orsolina28 Group, we do this solely and exclusively for informational purposes. These websites are outside our scope of control and this Policy does not apply. If you access other websites using the links we have provided, the operators of these sites will act as independent Data Controllers and may collect your data and use it in accordance with their Privacy Policy, which may differ from this Policy.

The companies of the Group have no control and do not provide any representation, nor assume any responsibility regarding the accuracy or any other aspect of the information available on such sites. The connection (link) to a third party site cannot be understood as validation by the Orsolina28 Group companies, the contents and services of these subjects. The Group companies make no representations or guarantees regarding the use or storage of the User's data on third-party sites. We invite you to carefully examine the privacy policy (generally located in the Footer of the websites) which regulates the third-party sites linked to our websites to have a complete vision of the possible use of your personal data.

6 DATA RETENTION

Your data will be retained for the period necessary to achieve the collection purposes. In particular:

PURPOSE	DESCRIPTION	TIME
F1	The personal data processed to provide you with a service, a product or a response to your requests will be kept for the entire duration of the contract or for the time necessary for the feedback.	//
	The personal data necessary to allow access to digital content or necessary to allow you to use our courses or products will be retained for the time established in the specific conditions of service (life cycle). Without prejudice to what is established by the legislation regarding contracts for the supply of digital contents, the retention times will take into account the type of contents and the purpose of their use.	//
	The data of the so-called prospects (potential customers) will be retained for a maximum of	24 months
F2	The personal data acquired by us or provided by you while browsing our sites (browsing LOG) will be retained for a period not exceeding	12 months
F3	The data is stored for the F1 purpose	//
F4	Your voluntary subscription to a newsletter service will allow us to process your data until you unsubscribe from the service via the appropriate link in each email. However, data collected for marketing purposes will be retained for an online period with your legitimate expectations in consideration of the interest shown by you in receiving // updates regarding products and services offered by the Orsolina28 Group. Tracking your interest in receiving communications from us may also be made through automation of the newsletter service that allows you to verify, for example your receipt of the communication and the opening (viewing) of the same.	//
F6	The data collected through cookies will be stored for a limited period of time, in order to allow us to analyze and evaluate your preferences, always in compliance with any applicable law and the consent you have previously provided. In any case, the storage times are indicated from time to time in the cookie policy of every website.	
F7 and F8	The data is stored until consent is revoked.	//
F1, F2, F3, F4, F5, F6,	Without prejudice to the retention times listed above, all personal data processed may be retained subsequently, if appropriate, for the foreseen limitation period by the legislation for the protection of related rights, without prejudice in any case to periods of greater conservation required by specific legal obligations or sector regulations. To example, for civil purposes, we may retain data for a period of 10 YEARS from	10 years

F7, F8	end of the contractual relationship.	
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7 SECURITY OF DATA AND PROCESSING

The companies of the Orsolina28 Group have adopted a specific shared organizational model, defined as the Privacy Organizational Model (MOP). Taking into account the organizational context of the respective companies, the needs of the supply chain (artistic promotion and courses) and the expectations of the interested parties involved, the MOP establishes Leadership and commitment of the individual Data Controllers, through the definition of organizational roles, internal and external responsibilities and authorities of the subjects involved.

Within the MOP, the safety objectives are identified and the actions necessary for their realization are planned. The resources and skills necessary for the constant and continuous improvement of the System over time are also guaranteed, periodically verifying its field of application and alignment with company objectives.

Furthermore, the Group companies have shared and implemented adequate technical and organizational security measures, so as to minimize the risks of destruction or loss, even accidental, of the data processed, unauthorized access or unauthorized or unauthorized processing. compliant with the collection purposes indicated in this information.

User responsibilities

If you have a password that allows you to access our services or websites, it is your responsibility to keep it secure and confidential to protect your information.

We encourage you to periodically check the security of the devices you use to access our content or services. It's appropriate to equip yourself with modern protection software from malicious codes or viruses. The security of the information you transmit to us also depends on the integrity and proper functioning of your IT devices.

8 TO WHOM DO WE COMMUNICATE YOUR DATA

Your personal data is known and processed by employees and collaborators of the Orsolina28 Group companies listed in paragraph 2.3. These subjects will operate as authorized persons for processing and have been instructed in this sense by the respective Data Controllers.

Your data may be communicated to third parties (e.g. companies/professional firms) that provide assistance and/or consultancy to Orsolina28 Group companies when:

- it is necessary to engage a third party service provider in order to facilitate or extend our services;
- when explicitly requested by you;
- when required by a provision of the judicial authority or by any legal or regulatory obligation;
- in connection with the sale, transfer or reorganization of a business;
- in order to enforce our contracts.

On this point it is specified that third parties are entities that provide us with a service or act as our representatives, such as, by way of example and not limited to, subcontractors (including their representatives), professional consultants, IT suppliers, database suppliers, specialists backup and disaster recovery providers, email providers and other service providers necessary to operate or improve our products and services. Our suppliers and service providers will be required to comply with our data processing and security standards. The data we communicate, including your personal data, will be provided only in relation to and to the extent strictly necessary to carry out their function. They will not be permitted to use your personal data for purposes other than those indicated in this policy.

Your personal data may be known and processed by police forces or judicial authorities, in accordance with the law and upon formal request by such subjects, or in the event that (1) there are well-founded reasons to believe that the

communication of such data is reasonably necessary for the investigation;

(2) prevent or take action regarding suspected illicit activities or assist state control and supervisory authorities; (3) in the event of a legal claim, if required, data may be transferred to defend us against such claim, (4) to ensure the safety of our users, customers and third parties, and (5) to protect our rights and property and the rights and property of our customers and third parties.

9 TRANSFERS OUTSIDE THE EU

The Web services offered by Orsolina28 Group companies 28 are based on systems in local servers, private and public clouds with datacenter normally located within the European Economic Area.

However, due to the characteristics of cloud services, your personal data could be transferred to countries located outside the economic area of the European Union (EEA). In such cases, we will make sure to guarantee you appropriate safeguards in accordance with the provisions of GDPR (articles 44-50). However, since the Internet is itself a public domain, its use involves the transmission of data in contexts beyond the control and responsibilities of the Orsolina28 Group companies. These transfers, carried out mainly for technical reasons linked to the use of specific protocols or services, can also take place internationally to third countries outside the European economic area. In particular, this may depend on the technologies you use to access our services.

For more information on the security measures implemented in the case of data transfers outside the EEA, you can contact us using the information we have provided to you at **paragraph 2 (Data Controllers)**.

10 USER RIGHTS

As a data subject, in accordance with applicable law and in relation to your personal data then exercise the following rights towards and against each data controller of the Orsolina28 Group:

- (a) **Right of access to personal data.** You have the right to obtain confirmation as to whether or not we are processing personal data concerning you and, if so, to obtain access to the personal data processed. You have the right to obtain a copy of the data being processed. This right is applicable only if it does not lead to infringement of the rights and freedoms of others. On this point it is specified that in the event of your request for further copies, we may charge you an expense contribution based on our administrative costs.
- (b) **Right to rectify, delete or limit the processing of personal data.** If you wish to rectify, delete or restrict the processing of your personal data, please contact us using the information we have provided in section 1. It is your responsibility to ensure that you provide true, accurate, complete data and keep it up to date.
- (c) **Right to withdraw consent.** If you have given us consent to process your data, you can revoke it at any time.
- (d) **Right to data portability.** If the processing is based on your consent or contract and is carried out by electronic means, you have the right to receive the personal data concerning you provided to us in a structured, commonly used and machine-readable format and you have the right to transmit such data to another data controller without impediments on our part.
- (e) **Right of opposition.** As a User you have the right to object to the processing of your data in certain circumstances. For example, you may benefit from this right if the processing is based on our legitimate interests (or those of third parties). You may contest whether our legitimate interests are based, however, we may have the right to continue to process such personal data on the basis of our legitimate interests or where this is relevant in relation to legal proceedings, or the data is necessary for the investigation, the exercise or defense of a right in court. You also have the right to object to the processing of your personal data for direct marketing purposes.

- (f) **Right not to be subjected to an automated decision-making process.** You have the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. The right does not apply if the processing is necessary for the conclusion or performance of a contract between you and a Orsolina28 Group company or you have given these companies your explicit consent. In these cases you have the right to obtain human intervention by the data controller, to express your opinion and contest the decision.
- (g) **Compensation.** We also remind you that anyone who suffers material or immaterial damage caused by a violation of Regulation (EU) 2016/679 has the right to obtain compensation for the damage from the data controller or data processor.
- (h) **Right to lodge a complaint to the authority of control.** We would like to point out that you have the right to lodge a complaint in front of the competent independent administrative authority in the Member State of the European Union where you habitually reside, where you work, or where an asserted violation of the law on the protection of your personal data has occurred. In Italian territory you can present a complaint to the Supervisory Authority "**Garantor for the protection of personal data**".



GPDP

Guarantor for the Protection of Personal Data

Switchboard +39 06.696771

: E-mail address: garante@gpdp.it

PEC address: protocollo@pec.gpdp.it

Website: <https://www.garanteprivacy.it>

11 HOW TO EXERCISE YOUR RIGHTS

If you have an Account, you can directly access your personal data in order to obtain a copy of it, as well as correct, modify or delete inaccurate data. You also have the option to request termination of your Account at any time by submitting a request to privacy@bio28.it.

If you receive commercial communications or have signed up to one of our information channels through the newsletter service, you can revoke your consent at any time by clicking on the appropriate link at the bottom of each of our communications.

As an interested party, you can exercise your rights through the information indicated in this document sending your request by means of a specific communication via PEC, traditional email, or by registered mail. The communication channel you choose will also be used by us for feedback (positive or negative).

If you are not already identified in the context in which the request occurs (e.g. you are not an authenticated user on one of our WEB services), we will ask you, whatever the method with which the request is presented, to attach or otherwise provide a document that allows your recognition.

In the event that your request is presented through third parties (in various capacities bound to you), it is necessary to accompany it with a specific written proxy or other document certifying any powers of representation.

The communications and feedback actions undertaken pursuant to the articles. from 15 to 21 of the GDPR are free.

However, if following the outcome of the verification requested by you as an interested party, it is not confirmed with the Orsolina28 Group companies the existence, even in the past, of data concerning you, or the request appears to be

manifestly excessive and/or repetitive, it is possible for us request it, only for the requests referred to in the articles. from 15 to 21 of the GDPR, a contribution to costs for the feedback.

We inform you that the burden lies on the Data Controller to demonstrate that your request is manifestly unfounded or excessive. In any case, the contribution requested from you can never exceed the costs actually incurred and documented in the specific case.

11.1 FORM FOR THE EXERCISE OF YOUR RIGHTS

To exercise your rights towards the owner, we recommend using the following form:

<https://www.garantepriacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

Remember that to allow you to exercise your rights, your identification is necessary on our part.

12 CHANGES TO THE POLICY

Document **INF-MOP.04 Rev. 02** has been in force since **10/10/2024**.

The information is updated periodically in order to always keep you informed.

If the information is modified in its fundamental parts (such as the purposes, methods, to whom we communicate the data, where we transfer them, etc.) it will be our responsibility to provide evidence of change.

13 SHORT INFORMATION FOR MINORS

This information is issued in short form to minors aged 14 or over.



Who we are and Why we ask for your data

We will process your personal data exclusively to allow you to create your user profile (account) necessary to allow you to access the course contents and use them safely.

Will you receive advertising from us? NO

Nobody will send you advertising messages. If you receive messages from us, notify your parents immediately. It is important that you do this because the person writing to you could be someone pretending to be us to deceive you.

Will we communicate your data to other parties?

We will not communicate your data to anyone and will protect them from access by unauthorized or malicious parties.

Is it safe to use our services?

We have asked our experts to always protect your data and we will do everything to prevent you from being put at risk. But remember that the internet can be a dangerous place. If you have any doubts about the security of your data or our applications, notify your parents or teacher immediately.

If you have problems, can you ask someone for help?

If you have any difficulty, you can contact us directly using the contact information you will find in the instructions that were provided to you with the product or service. Alternatively, we recommend that you turn to your parents and NEVER accept help from people you don't know. NEVER give your password to no one, not even to friends.

Whoever wants can help you find all the contact information in paragraph 2 of the extended information or in the instructions for use of your product or service.

Remember that, in some cases, you can find further instructions or information directly in the dedicated areas on our websites.

Are you granted any rights?

You have the right to know if we process your data, what data we process and why we process it. You have the right of access, rectification, cancellation. You also have the right to object to certain processing and to withdraw your consent to processing if the processing is based on such consent. You can find more information about your rights and how to exercise them in the extended information.

14 ATTACHED DOCUMENTS

ANNEX A - Essential elements of the co-ownership agreement for the provision of courses.

To provide the courses, the ORSOLINA28 GROUP companies intend to share data relating to the staff registered or intending to enroll or potentially interested in enrolling in the courses, to the teachers who will hold the training course and to the staff of the Orsolina28 GROUP companies and other external subjects involved in the organization and management of the course.

In the context of these processing activities, the companies of the Orsolina28 GROUP decide jointly regarding the determination of the purpose and essential means of the processing, determining the condition of joint ownership. For example, the companies jointly decide on the methods of delivery of the course, the teachers, the staff of the Orsolina28 GROUP companies to be involved, the type of course to be provided, and the methods of promoting the event.

OBJECT OF THE CONTRACT (Art. 1)

List of processing activities carried out jointly:

Agreed purposes	Agreed treatments
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PROVISION OF TRAINING COURSES

- Design and plan the course;
- organize and manage the course;
- manage course registrations;
- manage student attendance;
- manage any collections and payments;
- issue certificates or certificates of participation;
- allow access to physical classrooms;
- create and manage learners' user profiles;
- share the contents of the teaching material;
- select teachers and manage their relationship;
- promote the training course;
- collect information on satisfaction;
- manage follow-up marketing activities;
- guarantee the security of the places and IT tools used and logical accesses;
- fulfill legal obligations (e.g. reporting, invoicing, etc.)

PROCESSING METHODS (Art. 3)

1. The personal data of interested parties (e.g. teachers, students, staff of Orsolina28 GROUP companies involved in the organizational and operational phases), will be processed by the Parties exclusively in the context of the provision of training services and for strictly necessary purposes, in compliance with any law in force on the matter and will not be subjected by the parties to further processing in ways incompatible with the aforementioned purposes.
2. Any further processing of such personal data carried out by Orsolina28 GROUP companies does not fall within the scope of this agreement.
3. The parties agree on the following processing methods:
 - Course objectives;
 - categories of personal data necessary and functional for the provision of the course;
 - categories of interested parties involved in the processing activities (course recipients, instructors/teachers);
 - selection of the teacher and management of contractual and economic relationships;
 - authorizations and instructions to parties authorized to access the data of interested parties;
 - duration of data processing and subsequent storage;
 - software platforms for course registration and enrollment;
 - operational instructions for teachers who work in the events organized by the GROUP Orsolina28 or in the use of the dedicated platform;
 - method of managing the compliance of processing with the GDPR and centralized management of transparency and the exercise of rights (management system **SGDP**).
4. Personal data may be processed on paper or digital media, based on the activities carried out, provided that the tools are appropriately identified, inventoried and equipped with adequate security measures pursuant to art. 32 of the GDPR and their use by any authorized parties is appropriately regulated.
5. The Parties will use their respective IT systems, committing themselves to adopt suitable measures to avoid the loss, cancellation, destruction, even accidental, of personal data and any other risk connected to the processing of personal data in order to always guarantee an adequate protection of the rights and freedoms of interested parties.
6. Each Party undertakes to respect the shared security policies and to operate in accordance with its own code of ethics.
7. The methods of communication of personal data between the Parties are agreed according to specific needs.

TRANSPARENCY (Art. 4)

1. The Parties, taking into account the methods of delivery of the course, undertake to inform interested parties of the existence of any processing necessary for the execution of the training course, and to inform them of what data is collected (directly or from other sources), of the purposes of the processing operations planned or carried out with such data, currently or in the future. To ensure transparency, the Orsolina28 Group companies also individually recognize the interested party's right to access their personal data.
2. **Village28 s.r.l.** is responsible for drafting the information of the Data Controller pursuant to the articles. 13 and 14 of the GDPR for the processing covered by this agreement and to integrate the main terms of this agreement into the same.
3. In preparing the aforementioned information, **Village28 s.r.l.** provides a single point of contact to the interested party through the e-mail address privacy@bio28.it
4. The Orsolina28 Group company who collects personal data is responsible for providing the interested party with the information from the Data Controller pursuant to articles. 13 and 14 of the GDPR.
5. The parties guarantee the interested party to be able to freely exercise his rights, as an interested party, towards each individual party or towards all of them. The parties undertake to notify each other, without unjustified delay and in any case within **five (5)** working days, the possible receipt of a request from an interested party pursuant to any relevant law, including requests for the exercise of the rights referred to in Chapter III of the Regulation, also providing complete details regarding such request.

and registration platforms.

For the management of websites and providing services through a single WEB platform linked to the Orsolina28 Group brand, (e.g. management of course registration, collection of overnight stay data through a single platform called "YEP"), the companies of the Orsolina28 GROUP intend to share the data of the users and in the context of these processing activities, the companies of the Orsolina28 GROUP decide jointly, regarding the determination of the purposes and essential means of the processing, determining the condition of co-ownership. For example, the companies jointly decide on how users register on the platform and on its security.

OBJECT OF THE CONTRACT (Art. 1)

List of processing activities carried out jointly:

Agreed purposes	Agreed treatments
Providing services and contents through a single portal under the common brand "Orsolina28 Group"	<p>Provision of services managed via management software and websites</p> <ul style="list-style-type: none"> ● Allow free navigation of users on institutional sites (e.g. https://orsolina28.it ; https://www.bio28.it) ● allow users to register for services; ● manage course enrollment and data collection for hospitality through a single so-called platform. "YEP"; ● provide privacy information and compliance documentation; ● ensure the integration of the various services offered; ● guarantee the security of the contents and services offered; ● guarantee the security of contents, services and related delivery platforms; ● manage relationships with digital partners and service providers; ● comply with legal obligations.

PROCESSING METHODS (Art. 3)

1. The personal data of the interested parties will be processed by the Orsolina28 GROUP companies exclusively for the purposes of promoting products and services in compliance with any applicable law in force and will not be subjected by the parties to further processing in ways incompatible with this purpose.
2. Any further processing of such personal data carried out by Orsolina28 GROUP companies does not fall within the scope of this agreement.
3. The parties agree on the following processing methods:
 - User registration methods;
 - methods of delivery of the contents and services offered;
 - categories of personal data managed;
 - duration of data retention; Level Agreement on the provision of services;
 - technical and organizational safety measures;
 - protective actions to fight against abuse;
 - categories of interested parties involved in processing activities;
 - authorizations and operational instructions to the parties authorized to access the data of the interested parties;
 - duration of data processing and subsequent storage;
 - contractual clauses for Data Processing Agreements pursuant to art. 28 of the GDPR;
 - method of managing the compliance of processing with the GDPR and centralized management of transparency and the exercise of rights (management system **SGDP**).
4. The Orsolina28 GROUP companies stipulate this joint ownership agreement pursuant to art. 26 of the GDPR for the regulation of the provision of contents and services offered.
5. Personal data may be processed on paper or digital media, based on the activities carried out, provided that the tools are appropriately identified, inventoried and equipped with adequate security measures pursuant to art. 32 of the GDPR and their use by any authorized parties is appropriately regulated.
6. The Orsolina28 GROUP companies use their respective IT systems, committing themselves to adopt suitable measures to avoid the loss, deletion, even accidental destruction of personal data and any other risk connected to the processing of personal data in order to always guarantee an adequate one protection of the rights and freedoms of interested parties;
7. Each party undertakes to respect the shared security policies and to operate in accordance with its own code of ethics.
8. The parties undertake to note the processing in their respective registers pursuant to art. 30 of the GDPR and indicating the existence of this joint ownership agreement and the related references.
9. The methods of communication of personal data between the Parties are agreed according to specific needs.

TRANSPARENCY (Art. 4)

1. The Orsolina28 GROUP companies undertake to inform interested parties of the existence of any Promotion processing, and to inform them of what data is collected (directly or from other sources), of the purposes of the processing operations planned or carried out with such data, currently or in the future. To ensure transparency, the Orsolina28 GROUP companies they also individually guarantee the interested party the right to access their personal data.
2. The company **Village28 s.r.l.** is responsible for drafting the information pursuant to the articles. 13 and 14 of the GDPR for the processing covered by this agreement and to integrate the main terms of this agreement into the same.
3. In preparing the aforementioned information, **Village28 s.r.l.** provides a single point of contact to the interested party through the e-mail address privacy@bio28.it
4. The Orsolina28 GROUP company who collects personal data is responsible for providing the interested party with the information from the Data Controller pursuant to articles. 13 and 14 of the GDPR.
5. The parties guarantee the interested party to be able to freely exercise his rights, as an interested party, towards each individual party or towards all of them.
6. The parties undertake to notify each other, without unjustified delay and in any case no later than **five (5)** working days, the possible receipt of a request from an interested party pursuant to any relevant law, including requests for the exercise of the rights referred to in Chapter III of the Regulation, also providing complete details regarding such request.

ANNEX C - Essential elements of the co-ownership agreement for the provision of the services offered

To promote their products and services, the companies of the Orsolina28 GROUP intend to share their respective data of existing and potential customers and jointly collect new subjects towards whom or through whom they can promote products and services and who in the context of such processing activities, the companies of the Orsolina28 GROUP decide jointly regarding the determination of the purpose and essential means of the processing, determining the condition of joint ownership. For example, the companies jointly decide on the list of subjects towards whom promotional activities will be carried out, the type of product to be promoted, the type of promotion to be carried out (e.g. campaign or event) and how the promotion will be carried out (i.e. organization of the campaign or event).

OBJECT OF THE CONTRACT (Art. 1)

List of processing activities carried out jointly:

Agreed purposes	Agreed treatments
Promote products and services under a single common brand (Brand) " Orsolina28 Group "	<p>Management of promotional activities</p> <ul style="list-style-type: none"> - Plan the promotion and communication of the Brand; - organize and manage promotional campaigns; - manage the sending of commercial communications; - carry out soft spam activities - Send commercial communications pursuant to art. 130 paragraph 4 of D.Lgs. 196/2003; - send invitations to the event; - communicate the Brand, products, services, details, distinctive features and characterizations of the products and services offered; - management of direct and indirect marketing activities. <p>Event Management</p> <ul style="list-style-type: none"> - Design and plan the event; - promote the event (sending invitations); - organize and manage the event; - manage the relationship with the subjects involved in the organization; - manage event registrations; - collect information on satisfaction and manage feedback from event participants. <p>Follow-up management</p> <ul style="list-style-type: none"> - Plan and manage the follow-up of marketing operations and satisfaction surveys.

PROCESSING METHODS (Art. 3)

1. The personal data of the interested parties will be processed by the Orsolina28 GROUP companies exclusively for the purposes of promoting products and services in compliance with any applicable law in force and will not be subjected by the parties to further processing in ways incompatible with this purpose.
2. Any further processing of such personal data carried out by Orsolina28 GROUP companies does not fall within the scope of this agreement.
3. The parties agree on the following processing methods:
 - Products and services to promote;
 - subjects towards whom promotional campaigns will be carried out;
 - methods for carrying out promotional activities;
 - categories of personal data necessary and functional for promotional activities;
 - categories of interested parties involved in processing activities;
 - authorizations and instructions to parties authorized to access the data of interested parties;
 - duration of data processing and subsequent storage;
 - software platforms for carrying out promotion;
 - contractual clauses for Data Processing Agreements pursuant to art. 28 of the GDPR;
 - method of managing the compliance of processing with the GDPR and centralized management of transparency and the exercise of rights.
4. Personal data may be processed on paper or digital media, based on the activities carried out, provided that the tools are appropriately identified, inventoried and equipped with adequate security measures pursuant to art. 32 of the GDPR and their use by any authorized parties is appropriately regulated.
5. The Orsolina28 GROUP companies use their respective IT systems, committing themselves to adopt suitable measures to avoid the loss, deletion, even accidental destruction of personal data and any other risk connected to the processing of personal data in order to always guarantee an adequate one protection of the rights and freedoms of interested parties;
6. Each Party undertakes to respect the shared security policies and to operate in accordance with its own code of ethics;
7. The parties undertake to note the processing in their respective registers pursuant to art. 30 of the GDPR and indicating the existence of this joint ownership agreement and the related references.
8. The methods of communication of personal data between the Parties are agreed according to specific needs.

TRANSPARENCY (Art. 4)

1. The Orsolina28 GROUP companies undertake to inform interested parties of the existence of any Promotion processing, and to inform them of what data is collected (directly or from other sources), of the purposes of the processing operations planned or carried out with such data, currently or in the future. To ensure transparency, the Orsolina28 GROUP companies also individually guarantee the interested party the right to access their personal data.
2. The company **Village28 s.r.l.** is responsible for drafting the information pursuant to the articles. 13 and 14 of the GDPR for the processing covered by this agreement and to integrate the main terms of this agreement into the same.
3. In preparing the aforementioned information, **Village28 s.r.l.** provides a single point of contact to the interested party through the e-mail address privacy@bio28.it.
4. The Orsolina28 GROUP company who collects personal data is responsible for providing the interested party with the information from the Data Controller pursuant to articles. 13 and 14 of the GDPR.
5. The parties guarantee the interested party to be able to freely exercise his rights, as an interested party, towards each individual party or towards all of them.

The parties undertake to notify each other, without unjustified delay and in any case within five (5) working days, of any receipt of a request from an interested party pursuant to any relevant law, including requests for the exercise of rights , also providing complete details regarding such request.