

Benvenuto Club of Milano Privacy Notice about collecting personal data on line

Dear customer/visitor

The BENVENUTO CLUB OF MILAN is committed to protecting your privacy.

This notice provides you a short description of how we collect and use your personal data and also describes the rights you have in relation to it under the R.E. 2016/679 GDPR (General Data Protection Regulation), Italian “Privacy Code” (D.Lgs. 101/2018) and EDPB recommendations (May 4th 2020) on collecting personal data on line and cookies consent.

For further information please refer to our Privacy Policy or to our Privacy Statement (Italian and English version) .

1. Data Controller

Your Data Controller is the Benvenuto Club of Milan, based at Circolo Volta, Via Giusti 20122, Milano, available at benvenutomilan@gmail.com or PEC benvenutoclubofmilan@pec.it

As for their peculiar situation, the Data Controller is not obliged and does not recur to a Data Protection Officer (DPO) or Manager.

2. Personal Data Collected by BCM

Data controller, as mentioned above, may collect the following data:

- 1) **Contact information** : name, surname, nationality, date of birth, work position, company, telephone (including mobile phone number), e-mail and postal address;
- 2) **Technical information** : when you access this website as IP address, browser plug-in types and version, operating systems, device type, mobile network information;
- 3) **On line data** : when you access this website as information about your visit (URL clickstream to, through and from our website, date and time, pages viewed or searched for, length of visits and interaction such as scrolling.

We do not collect personal data about your on-line activities across third party websites. Personal data as described under point 1) are provided to us by you if you use our contact form.

3. Purposes and legal basis for personal data treatment

We use your personal data for the following purposes:

- 1) Service provision: providing information you requested us by filling the form (Q&A)
- 2) Members relationship: managing our relationship with you including keeping records and contacts, to develop our/members' relationship
- 3) Communication: sending e-mails, letters or invitation to keep you informed of our services provided to you/or of your interest

Data will be processed under “minimization principle” (art. 5 GDPR) and legal basis such as given consent or legitimate interest.

4. How we treat Personal data, how we manage your data , where and for how long we keep them

We will hold your information securely in line with physical, technical and administrative security measures in order to avoid illegal or unauthorized access, disclosure, modification or destruction. Transmission of information made by the Internet however is not completely secure: that's why we cannot guarantee the complete security of your information and any transmission is at your own risk even if we will take reasonable measures to protect your information.

Benvenuto Club of Milan will protect your information in line with national applicable data protection requirements: we process data in compliance with the principles of correctness, lawfulness and transparency, using secure IT tools, with methods and logics strictly related to the purposes indicated in point 3.

We generally keep your information as needed to provide our services or advices. Depending on a number of different factors (new member, active member, past/former member) our typical retention periods may vary from 3 to 15 years from your last interaction with us. After that period your data will be anonymized or deleted.

Your personal data may be shared with members of Benvenuto Club of Milan, staff and contractors in order to provide requested services. Your information may also be shared with suppliers (IT and communication, marketing and advertising agencies, back up and archive suppliers, etc) being appointed as External Data Processors. Complete list of EDP may be asked to Data Controller.

Your information will never be object to dissemination or any other fully automated decision-making process, including profiling.

5. Your rights

You, as subject whose Personal Data are processed, have certain rights in compliance with art. 15 to 21 of GDPR which you can use in relation to your information. They are set out below in more details.

- 1) **Access:** art. 15 enables you to have our confirmation about the existence of personal data regarding you, held by us concerning data origin, purposes and processing methods, data controller and/or data processor identification and more information as reported in previous points (1-4) . This enables you to receive a copy of your data and other details.

Other fundamental rights under art. 16 to 20 of GDPR are:

- 2) **Correction:** you are entitled to request that any incomplete or inaccurate personal data that we hold about you is corrected;
- 3) **Erasure:** you are entitled to ask us to delete or remove personal data in certain circumstances. We may refuse a request of erasure only if your request will contrast compliance with other law or in connections with claims;
- 4) **Restriction:** you are entitled to ask us to suspend the processing of certain of personal data about you for example if you want to establish its accuracy or the reason of processing;
- 5) **Objection:** you have the right to object where we may process your data for marketing purpose or other purposes even if they are relevant for that process;

- 6) **Automated decisions:** you may contest any automated decision made about you and ask for it to be reconsidered;
- 7) **Consent:** where we are processing personal data with consent, you can withdraw your consent;
- 8) **Data Portability:** you have the right to receive from us your personal data in a portable ,commonly used and easily readable format, and the right to ask us to transmit it to another data controller.

If you want to exercise any of those rights please contact one of the following contact in Benvenuto Club of Milan writing at the relevant e-mail address.

benvenutomilan@gmail.com

Presidentbenvenuto@gmail.com

You also have a right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it)