# Privacy Policy pursuant to the General Data Protection Regulation (GDPR) - "Regulation"

ASC Srl (hereinafter "ASC" or "the Controller"), as data controller, informs you of the following regarding the processing of your personal data pursuant to art. 13 of European Regulation 2016/679.

#### Purpose of the processing and consequences of refusal to provide your personal data

ASC processes your personal data (hereinafter "the **Data")** that you provide when registering for our courses or events, for the purposes described below.

#### a) Purposes necessary for managing your participation in our courses or events

1) ASC processes the Data to the extent necessary to properly manage your registration and participation in our events and courses. In this case, the Data will be processed to fulfill your request and therefore to provide you with the services you requested and all related activities (e.g., invoicing, etc.), including all processing required by law in relation to such services.

We therefore process the Data for the conclusion and execution of the relevant contract, including the fulfillment of the resulting services and obligations.

# b) Marketing purposes and communication to third parties

- 2) The Data may also be used, with your consent, for direct marketing purposes, namely to conduct promotional and marketing activities related to ASC's brands, products, and initiatives. For this purpose, your data will be used to invite you, including by email and/or telephone, to events or courses organized by ASC and to manage the formalities of your attendance and participation in such events, or to conduct market research.
- 3) With your consent, which is optional, your Data may also be disclosed to previously indicated third parties, who will process them, as independent data controllers, for direct marketing purposes or to promote their brands, products, and initiatives, as well as to conduct market research.

Providing your data for the purpose referred to in point 1 is essential to allow you to participate in events and/or courses, as requested. It is obviously optional, but without it, you will not be able to conclude the relevant contract and allow the performance of such services.

For marketing purposes and communication to third parties for marketing purposes as indicated above (points 2 and 3) is optional and your refusal will have no consequences.

## Methods and legal bases of processing

ASC processes your personal data with and without the aid of electronic tools, based on logic and procedures consistent with the purposes indicated below and in compliance with the Regulation, including confidentiality and security aspects.

Your personal data is processed for the purposes referred to in point 1 to execute a contract and to fulfill your requests and for points 2 and 3, only with your consent.

#### Disclosure of your personal data to third parties

Personal data is accessible to our duly authorized personnel on a need-to-know basis and is disclosed to third parties in the following cases:

- (i) when communication is required by applicable laws and regulations with respect to legitimate third party recipients of communications, such as authorities and public bodies for their respective institutional purposes;
- (ii) when the communication has been expressly consented to by you, after indicating the third party recipients, as indicated in point 3.

Your Data may be disclosed to insurance companies, the police, or other public authorities in connection with any request, dispute, sanction, or measure connected to our relationships.

Your data is also shared with our service providers, e.g., for technical and organizational services that are functional to the purposes indicated above, such as independent contractors, including associates—e.g., for sending emails, managing payments, companies specializing in market research and data processing, advertising companies, etc. We provide these parties only with the data necessary to perform the agreed-upon services, and they act as data processors based on the instructions received from ASC.

## Retention of personal data

The data processed for the purposes of managing your participation in our courses and events will be deleted 10 years after the end of the event or course to which they refer.

For marketing purposes, the data is retained for a period of 24 months, unless you renew or confirm your consent. You may also, at any time, request the deletion of your data for these purposes and object to the processing of your data for marketing purposes.

This does not apply to cases where, in order to comply with a legal obligation or to exercise or defend its rights in court, ASC is authorized to retain the Data for a different period.

#### Data controller

The Data Controller is ASC Srl, with registered office in Via Gianni Mazzocchi n 1/3, 20089 Rozzano (Milan), Italy.

#### Your rights

The Data Controller informs you that in the context of the processing of your personal data, you enjoy all the rights provided for by the Regulation, in particular:

of the right of access pursuant to art. 15 of the Regulation

of the right of rectification pursuant to art. 16 of the Regulation

of the right to erasure (right to be forgotten) pursuant to art. 17 of the Regulation

of the right to restriction of processing pursuant to art. 18 of the Regulation

of the right to data portability pursuant to art. 20 of the Regulation and

of the right to object to processing pursuant to art. 21 of the Regulation.

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the Regulation.

## **Data Protection Officer (DPO)**

ASC has appointed its Data Protection Officer (DPO) pursuant to Article 37 of EU Regulation 2016/679.

We remind you that, at any time, for all matters relating to the processing of your data, as well as to exercise your rights, you can freely contact the DPO by writing to

ASC Data Protection Officer, at ASC Srl, via G. Mazzocchi n. 1/3 - 20089 Rozzano (MI) or by sending an email to: dpo@edidomus.it.

Where you have consented to the disclosure of your data to third parties for the marketing purposes referred to in point 3, you may, at any time and for all matters relating to the processing of your data, contact said third parties directly, who act as independent data controllers, according to the instructions provided in the specific information.