

PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA FOR COLLABORATORS / EXTERNAL EXPERTS







In accordance with EU Regulation No. 679/2016 (General Data Protection Regulation - GDPR), ENAC (Ente Nazionale Canossiano) ensures the protection of individuals concerning the processing of their personal data. ENAC processes personal data lawfully, fairly, and transparently, safeguarding your privacy and rights.

Data Controller: ENAC Ente Nazionale Canossiano

Registered Office: Via Rosmini, 10 – 37123 Verona (VR)

For more information, you can send a message to the following email address: enac@enac.org

Summary of Our Privacy Policy ENAC Ente Nazionale Canossiano

 <p>Personal data refers to information relating to an identified or identifiable natural person ("data subject").</p> <p>ENAC Ente Nazionale Canossiano processes the data subject's personal data for the purpose of establishing and managing the collaboration relationship with the data subject, specifically:</p> <ul style="list-style-type: none"> • for the performance of the contract, in order to fulfill the obligations connected to it; • for the fulfillment of legal obligations (including regulatory requirements related to the service in the case of a funded project); • with prior consent, for the promotion and dissemination of the results of the activity. 	 <p>ENAC Ente Nazionale Canossiano is the "Data Controller" and has implemented appropriate technical and organizational measures to protect the personal data provided.</p>	 <p>"Processing" consists of operations carried out using electronic, digital, or paper-based tools to collect, organize, store, and communicate personal data.</p>
 <p>In the processing of personal data, ENAC Ente Nazionale Canossiano is supported by "authorized internal personnel," who receive dedicated training to ensure privacy and confidentiality.</p>	 <p>Personal data are not subject to dissemination and are not transferred to third parties for profiling or marketing purposes.</p> <p>Personal data collected for the execution of the contract may be communicated to third parties in Italy and within the European Union in compliance with legal and contractual obligations: INPS, INAIL, Ministerial Offices, Tax Offices, the activity's Funding Body, project partners, professionals and service companies for business administration and management, auditing firms, financial institutions, and relevant public administrations.</p> <p>Images may be disseminated and communicated to third parties, subject to specific consent.</p>	 <p>For more information on the processing of personal data by ENAC Ente Nazionale Canossiano, please refer to the full privacy notice, available:</p> <ul style="list-style-type: none"> • on our website at http://enac.org/privacy/ • in paper format at our office • by requesting a copy via email at enac@enac.org

To be returned signed

CONSENT ACQUISITION

I, the undersigned (surname and first name) _____
born in _____ on _____, declares to
have received complete information pursuant to the GDPR (EU Regulation 679/2016) and gives consent
to the processing, publication, and dissemination of images such as photographs and/or videos, as well
as links to their social media profiles, aimed at promoting the activities of the Organization, as specified in
the privacy notice:

☐ I give my consent

☐ I do not give my consent

Signature _____

Date _____

OUR PRIVACY POLICY IN DETAIL

1. WHAT IS THE GENERAL LIFE CYCLE OF PERSONAL DATA? PERSONAL DATA SUBJECT TO PROCESSING, PURPOSES, AND CONDITIONS OF LAWFULNESS OF PROCESSING

The life cycle of personal data describes the point at which ENAC Ente Nazionale Canossiano begins processing personal data, the purposes and methods of processing, and the retention period.

Which personal data do we process?	Why do we process them (purpose and legal basis)?	What happens if we are unable to process the data?	How long do we process them for?
Personal identification data Contact information Educational qualifications Curriculum Vitae (CV) Employment status Job position	The processing is necessary for the establishment and management of the collaboration relationship in execution of the contract and to fulfill legal obligations.	Any refusal to provide information at the time of data collection, or any refusal to allow the processing of data, results in the Data Controller's objective inability to fulfill contractual or legal obligations, as well as to properly manage mutual relations and to establish and manage the collaboration relationship.	The data will be processed for 10 years from the date of the last payment made within the framework of the funded project for purposes of evidence and documentation for tax/accounting reasons, as well as for reporting and verification by the entities that fund or recognize the funded project.
Health/ social data	Processing is necessary in the case of coordinated and continuous collaborations to fulfill legal obligations.	Refusal results in the inability to fulfill mandatory legal communication requirements.	The data will be processed for 10 years (or longer if necessary) from the date of the last payment made within the framework of the project to which the collaboration agreement relates.
Data relating to criminal convictions, offenses, or related security measures	The processing of data relating to the criminal record certificate from the criminal records registry is carried out in accordance with the law, only when the subject matter of the service under the contract involves direct and regular contact with minors.	Any refusal to allow the processing of data results in the Data Controller's objective inability to fulfill contractual obligations.	
Photographs and recordings	Processing, subject to specific consent, is aimed at promoting the organization, its training activities, or the activity subject to the service, through the use of the website or social media profiles, and the publication/dissemination of brochures, booklets, informational and/or promotional materials of the organization itself and/or of project partners.	Refusal to consent to the publication of such data on the organization's web pages does not prevent the establishment of the employment relationship.	If the data are not published, they will be processed for 5 years after the end of the project to which the collaboration agreement relates.

2. HOW ARE PERSONAL DATA PROCESSED?

The processing of your data may be carried out using both electronic and manual means, in compliance with all technical and organizational measures implemented by the Data Controller to ensure the security and confidentiality of the information. In cases where social media platforms and cloud services are used, data may also be transferred to third countries. Any such transfer will always occur in compliance with appropriate and adequate safeguards, as required by applicable law.

3. WHO PROCESSES PERSONAL DATA?

Your data are processed by:

- **Authorized Internal Personnel**, specifically trained, who are bound by professional secrecy and maximum confidentiality (Board of Directors and internal staff of the organization).

4. WHO CAN ACCESS PERSONAL DATA?

Your personal data are not subject to dissemination and are not transferred to third parties. However, within the execution of the contract, your data may be communicated to:

- **External Data Processors**, specifically appointed based on their roles and expertise, in accordance with regulatory requirements. The Data Controller has appointed as Processors:
 - Board of Auditors, Supervisory Body;
 - Professionals and service companies handling business administration and management on behalf of the organization (e.g., accountants, labor consultants, providers/managers/maintainers of IT networks, software, websites, and social media);
 - Operational and business partners involved in the project activities related to the collaboration;
- **Public Administrations and Social Security/Insurance Bodies** (e.g., INPS, INAIL, Tax Offices, Pension Funds, Ministerial Offices, Provincial Labor Directorate, Employment Centers, etc.), for the fulfillment of all social security, tax, welfare, and insurance obligations;
- **Regione Veneto and/or other Regions and/or the Project Funding Body** (including inspectors appointed by the funding body) for project management and reporting obligations related to the professional collaboration;
- **Audit firms** in charge of financial reporting inspections possibly appointed by ENAC Ente Nazionale Canossiano, Regione Veneto, and/or the Project Funding Body;
- **Financial institutions** for managing payments;
- **Public administrations** of affiliation for public employees engaged outside of their regular working hours, in compliance with Article 53 of Legislative Decree 165/2001 ("Register of Services").

All parties belonging to the categories to whom data may be communicated will use the data as independent **Data Controllers** under the law, operating autonomously, or as **Data Processors**.

The list of Data Processors is constantly updated and available upon request by contacting the organization's headquarters. Only the data strictly necessary for the performance of the specific tasks assigned will be communicated to the aforementioned parties.

Your data, limited to images, videos, or links to social media profiles depicting your likeness, may, subject to your specific consent, be published and disseminated through:

- the organization's website and social media pages and/or those of project partners;
- brochures, informational leaflets, or promotional materials of the organization and/or project partners.

5. WHAT ARE MY PRIVACY RIGHTS AND WHOM SHOULD I CONTACT?

In relation to the above processing activities, the data subject may exercise all rights provided under Articles 12–22 of the European Regulation No. 679/2016 (GDPR).

The data subject may contact ENAC Ente Nazionale Canossiano via:

- Registered letter with return receipt sent to the legal headquarters at Via Rosmini, 10 – 37123 Verona (VR), Italy;
- Email to enac@enac.org.

The EU Privacy Regulation grants you the exercise of specific rights, including the right to request from the Data Controller:

- confirmation as to whether or not personal data concerning you are being processed, and access to such data (**right of access**);
- the rectification of inaccurate personal data or the completion of incomplete personal data (**right of rectification**);
- the erasure of personal data where one of the grounds provided for by the Regulation applies (**right to erasure / right to be forgotten**);
- the restriction of processing where one of the conditions set out in the Regulation applies (**right to restriction of processing**);
- to receive the personal data you provided to the Data Controller in a structured, commonly used, and machine-readable format, and to transmit those data to another Data Controller (**right to data portability**).

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a Supervisory Authority if you believe that the processing of your personal data violates the EU Privacy Regulation.

For more information on the right to lodge a complaint, you can visit the following webpage: <https://goo.gl/GLbTN9>.