

# Privacy Policy of www.enac.org

This Application collects some Personal Data from its Users.

#### **Data Controller**

ENAC Ente Nazionale Canossiano, Via Rosmini 10, 37123 Verona, Italy

Email address of the Data Controller: enac@enac.org

## Types of Data Collected

Among the Personal Data collected by this Application, either independently or through third parties, are: email address; first name; last name; Cookies; Usage Data. Full details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific informational texts displayed before the data is collected.

Personal Data may be freely provided by the User, or, in the case of Usage Data, collected automatically during the use of this Application. Unless otherwise specified, all Data requested by this Application is mandatory. Failure to provide such Data may make it impossible for this Application to provide its Services.

Where this Application specifically states that certain Data is optional, Users are free to refrain from communicating such Data without any consequences on the availability or operation of the Service.

Users who have doubts about which Data is mandatory are encouraged to contact the Controller.

The possible use of Cookies—or other tracking tools—by this Application or by the owners of third-party services used by this Application, unless otherwise stated, is aimed at providing the Service requested by the User, as well as the additional purposes described in this document and, if available, in the Cookie Policy.

The User assumes responsibility for the Personal Data of third parties obtained, published, or shared through this Application and guarantees that they have the right to communicate or disseminate it, thus releasing the Controller from any liability towards third parties.

# Method and Place of Processing the Collected Data

### **Method of Processing**

The Controller takes appropriate security measures to prevent unauthorized access, disclosure, alteration, or destruction of Personal Data.

Data processing is carried out using computers and/or IT-enabled tools, following organizational procedures and modes strictly related to the stated purposes. In addition to the Controller, in some cases, Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies,



communication agencies) appointed, if necessary, as Data Processors by the Controller. The updated list of these parties may be requested from the Controller at any time.

# **Legal Basis for Processing**

The Controller may process Personal Data relating to Users if one of the following applies:

- The User has given consent for one or more specific purposes; Note: In some
  jurisdictions, the Controller may be allowed to process Personal Data without
  the User's consent or any of the other legal bases specified below, as long as
  the User does not object ("opt-out") to such processing. This is not applicable
  whenever the processing of Personal Data is subject to European data
  protection law;
- Processing is necessary for the performance of a contract with the User and/or for any pre-contractual obligations;
- Processing is necessary for compliance with a legal obligation to which the Controller is subject;
- Processing is related to a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.

In any case, the Controller will gladly help to clarify the specific legal basis that applies to the processing, and whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### **Place**

The Data is processed at the Controller's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own.

To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users also have the right to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law (such as the UN) and about the security measures taken by the Controller to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquiring with the Controller using the contact information provided at the beginning.

# **Retention Period**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.



### Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Controller and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the legitimate interests of the Controller shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Controller within the relevant sections of this document or by contacting the Controller.

The Controller may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Controller may be obliged to retain Personal Data for a longer period whenever required to do so for compliance with a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

# **Purpose of Processing the Collected Data**

The User's Data is collected to allow the Controller to provide its Services, as well as for the following purposes: contacting the User, managing contacts and sending messages, heat mapping, and session recording.

For more detailed information on the purposes of processing and on the Personal Data specifically relevant to each purpose, the User may refer to the relevant sections of this document.

## **Details on the Processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

# **Contacting the User**

Mailing list or newsletter (this Application)

By registering to the mailing list or newsletter, the User's email address is automatically added to a list of contacts who may receive email messages containing information, including commercial and promotional information, related to this Application. The User's email address may also be added to this list as a result of registering for this Application or after making a purchase. **Personal Data collected:** last name; email; first name.



# Contact form (this Application)

By filling out the contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes, or any other kind of request as indicated by the form's header.

Personal Data collected: last name; email; first name; curriculum vitae.

# **Managing Contacts and Sending Messages**

This type of service allows the management of a database of email contacts, phone contacts, or other contact information to communicate with the User. These services may also collect data concerning the date and time when the User views the messages, as well as the User's interaction with them, such as information about clicks on links included in the messages.

# Mailchimp (The Rocket Science Group LLC)

Mailchimp is an address management and email message sending service provided by The Rocket Science Group LLC.

Personal Data collected: last name; email; first name.

**Place of processing:** United States – <u>Privacy Policy</u>. Participant in the Privacy Shield Framework.

## **Heat Mapping and Session Recording**

Heat mapping services are used to identify which areas of a page are subject to cursor or mouse clicks, in order to detect which areas attract the most interest. These services make it possible to monitor and analyze web traffic and track User behavior. Some of these services may record sessions and make them available for later viewing.

# **Hotjar Heat Maps & Recordings (Hotjar Ltd.)**

Hotjar is a heat mapping and session recording service provided by Hotjar Ltd. Hotjar honors generic "Do Not Track" headers. This means that the browser can tell the script not to collect any User data. This is a setting available in all major browsers. More information about Hotjar's opt-out option is available <a href="here">here</a>.

**Personal Data collected:** Cookies; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – Privacy Policy – Opt Out.

### **Interaction with Social Networks and External Platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.

The interactions and information acquired through this Application are always subject to the User's privacy settings for each social network.

This type of service may still collect traffic data for the pages where the service is



installed, even if Users do not actively use it.

It is recommended to log out from the respective services to ensure that the processed data on this Application is not linked back to the User's profile.

# AddToAny (AddToAny LLC)

AddToAny is a service provided by AddToAny LLC that displays a widget allowing interaction with social networks and external platforms, and sharing content from this Application.

Depending on the configuration, this service may display widgets belonging to third parties (e.g., social network providers). In this case, even the third parties providing the widget will be aware of the interactions performed and the Usage Data relating to the pages where the service is installed.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

### **SPAM Protection**

This type of service analyzes the traffic of this Application, potentially containing Users' Personal Data, in order to filter parts of traffic, messages, and content recognized as SPAM.

# **Akismet (Automattic Inc.)**

Akismet is a SPAM protection service provided by Automattic Inc.

**Personal Data collected:** Various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

### **Statistics**

The services in this section allow the Controller to monitor and analyze web traffic and to keep track of User behavior.

## Google Analytics with anonymized IP

Google Analytics is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on the location this Application is used from ("Google"). Google uses the collected Personal Data to track and examine the use of this Application, to prepare reports on its activities, and to share them with other Google services.

Google may use the collected Personal Data to contextualize and personalize the ads of its advertising network.

This integration of Google Analytics anonymizes your IP address. Anonymization works by shortening Users' IP addresses within the member states of the European Union or in other countries that are parties to the agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server and shortened within the United States.



Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out; Ireland – Privacy

Policy - Opt Out.

Participant in the Privacy Shield Framework.

# **Content and Functionality Performance Testing (A/B Testing)**

The services contained in this section allow the Data Controller to track and analyze the User's response, in terms of traffic or behavior, regarding changes to the structure, text, or any other component of this Application.

## **Google Website Optimizer**

Google Website Optimizer is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on the location this Application is used from ("Google").

Google may use the collected Personal Data to contextualize and personalize ads within its advertising network.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Participant in the Privacy Shield Framework.

# **Displaying Content from External Platforms**

This type of service allows Users to view content hosted on external platforms directly from the pages of this Application and to interact with it.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not actively use it.

# **Google Fonts**

Google Fonts is a font display service provided by Google LLC or by Google Ireland Limited, depending on the location where this Application is used, allowing this Application to incorporate such content within its pages.

**Personal Data collected:** Usage Data; various types of Data as specified in the service's privacy policy.

**Place of processing:** United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>. Participant in the Privacy Shield Framework.

## **Google Site Search**

Google Site Search is a search engine embedding service provided by Google LLC or by Google Ireland Limited, depending on the location where this Application is used, allowing this Application to incorporate such content within its pages.

Personal Data collected: Cookies: Usage Data.

**Place of processing:** United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>. Participant in the Privacy Shield Framework.

### Vimeo (Vimeo, LLC)

Vimeo is a video content viewing service provided by Vimeo, LLC, allowing this



Application to incorporate video content within its pages.

Personal Data collected: Cookies; Usage Data.

**Place of processing:** United States – <u>Privacy Policy</u>. Participant in the Privacy

Shield Framework.

# **Additional Services Displaying External Content**

This type of service allows Users to view calendar or map content hosted on external platforms directly from the pages of this Application and to interact with it. Even if Users do not actively use the service, these platforms might collect web traffic data.

# **Google Calendar Widget**

Google Calendar Widget is a calendar content visualization service managed by Google LLC or by Google Ireland Limited, depending on the location where this Application is used, allowing this Application to incorporate such content within its pages.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Participant in the Privacy Shield Framework.

## **Google Maps Widget**

Google Maps is a map visualization service managed by Google LLC or by Google Ireland Limited, depending on the location where this Application is used, allowing this Application to incorporate such content within its pages.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Participant in the Privacy Shield Framework.

# **User Rights**

Users may exercise certain rights regarding their Data processed by the Controller. In particular, the User has the right to:

### Withdraw consent at any time.

The User can withdraw previously given consent to the processing of their Personal Data.

## Object to the processing of their Data.

The User can object to the processing of their Data when it is carried out on a legal basis other than consent. Further details are provided in the section below.

## Access their Data.

The User has the right to obtain information about the Data processed by the Controller, about certain aspects of the processing, and to receive a copy of the Data being processed.



# Verify and request rectification.

The User can verify the accuracy of their Data and request its update or correction.

# Restrict the processing of their Data.

When certain conditions apply, the User may request the restriction of the processing of their Data. In that case, the Controller will not process the Data for any purpose other than storing it.

# • Obtain the erasure or removal of their Personal Data.

When certain conditions apply, the User can request the erasure of their Data by the Controller.

## Receive their Data and have it transferred to another controller.

The User has the right to receive their Data in a structured, commonly used, and machine-readable format and, if technically feasible, to have it transmitted to another controller without hindrance. This provision applies when the Data is processed by automated means and the processing is based on the User's consent, a contract to which the User is party, or pre-contractual obligations thereof.

# Lodge a complaint.

The User may lodge a complaint with the competent data protection authority or take legal action.

# **Details about the Right to Object**

Where Personal Data is processed for a public interest, in the exercise of official authority vested in the Controller, or for the purposes of the legitimate interests pursued by the Controller, Users may object to such processing for reasons related to their particular situation.

Users should know that if their Personal Data is processed for direct marketing purposes, they can object to that processing at any time without providing any justification.

To determine whether the Controller is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

# **How to Exercise These Rights**

To exercise their rights, Users can send a request to the Controller using the contact details provided in this document.

Requests are made free of charge and will be addressed by the Controller as early as possible, and always within one month.

## **Additional Information about Data Processing**

#### **Defense in Court**

The User's Personal Data may be used by the Controller for legal purposes in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.



The User declares to be aware that the Controller may be required to reveal Personal Data upon request of public authorities.

# **Specific Information**

Upon request, in addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data.

# **System Logs and Maintenance**

For operation and maintenance purposes, this Application and any third-party services may collect system logs, i.e., files that record interactions and may contain Personal Data, such as the User's IP address.

## **Information Not Contained in This Policy**

More details concerning the collection or processing of Personal Data may be requested from the Controller at any time using the contact information provided.

# Response to "Do Not Track" Requests

This Application does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honor the "Do Not Track" requests, Users are advised to consult their respective privacy policies.

# **Changes to This Privacy Policy**

The Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Application and/or — as far as technically and legally feasible — sending a notice to Users via any contact information available. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities based on the User's consent, the Controller shall collect new consent from the User, where required.

# **Definitions and Legal References**

## **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data**

Information collected automatically through this Application (or third-party services employed in this Application), including: the IP addresses or domain names of the computers used by the Users who use this Application, URI addresses (Uniform Resource Identifier), the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's response (success, error, etc.), the country of origin, the features of the browser and the operating system used by the User, the various time



details per visit (e.g., the time spent on each page), and the details about the path followed within the Application with special reference to the sequence of pages visited.

#### User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

# **Data Subject**

The natural person to whom the Personal Data refers.

## **Data Processor (or Processor)**

The natural or legal person, public authority, agency, or other body that processes Personal Data on behalf of the Controller.

# **Data Controller (or Controller)**

The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application.

The Data Controller, unless otherwise specified, is the owner of this Application.

# **This Application**

The hardware or software tool by which the Personal Data of the User is collected and processed.

### Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

## **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

#### Cookies

Small sets of data stored in the User's device.

### Legal References

This privacy policy is drafted based on provisions of multiple legislations, including Art. 13 and 14 of Regulation (EU) 2016/679 (General Data Protection Regulation — GDPR).

Unless otherwise specified, this privacy policy exclusively relates to this Application.