

PRIVACY POLICY

PURSUANT TO ARTICLES 13-14 OF REGULATION (EU) 2016/679 (GDPR)

REV. 00 of 01/01/2023

Fondazione Trofeo Mezzalama (the Mezzalama Trophy Foundation) hereby provides information on the processing of your personal data acquired, even verbally, either directly or through third parties, as necessary for the performance of administrative, accounting, management and contractual tasks connected with or deriving from your participation in events organised by our Foundation.

This information is provided in accordance with the provisions of Articles 13-14 of Regulation (EU) 2016/679 (so-called GDPR), as well as of Legislative Decree 196/2003 as amended by Legislative Decree 101/2018.

1. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER.

The Data Controller (hereinafter also "Controller") is Fondazione Trofeo Mezzalama, with registered office in Villa Margherita 11025 Gressoney-Saint-Jean (Aosta) Italy, Tax ID no. 90011840072, VAT no. 00638840074, email info@trofeomezzalama.it, PEC trofeomezzalama@pec.it.

2. PURPOSE OF DATA PROCESSING.

Pursuant to Articles 6 and 7 GDPR, it should be noted that the processing of personal data may be necessary in connection with your participation in events and competitions and the related contractual and pre-contractual procedures, as well as in connection with the performance of administrative, accounting and management tasks inherent in and/or related to registration and participation as per your request and the obligations provided for by national and/or EU laws, regulations and legislation.

The Foundation may process the Data Subject's personal data relating to images, audio and/or video for the creation of souvenir photographs or films of event participants, for the Foundation's internal activities, for the presentation of activities in promotional events, presentation brochures, posters for internal use, news articles in local magazines and daily newspapers relating to events in which the Foundation was an active participant, publications on the website and on the social media profiles of the Foundation.

All images (photos and videos) taken during the Mezzalama Trophy will be considered the property of the Mezzalama Trophy Foundation.

The communication and dissemination of the aforementioned images, audio and/or video is exclusively for the information and promotion of events through the Foundation's website and social media profiles, or through the press, television media and sponsors.

Images, audio and video may not be used in contexts that undermine personal dignity and decorum and in any case for uses and/or purposes other than those indicated.

3. LEGAL BASIS FOR THE PROCESSING.

3.1. With regard to the processing of personal data:

- Given that the processing is necessary for participation in events/competitions and for the connected contractual procedures or for the adoption of pre-contractual measures at the request of the Data Subjects, the legal basis for the processing is that provided for in Article 6, paragraph 1, point B) GDPR, i.e. the performance of the contract;

– With reference to the fulfilment of legal obligations inherent in or arising from participation in events/competitions and related procedures, including Article 36 of the Italian Civil Code, the legal basis is Article 6, paragraph 1, point C) GDPR, i.e. the compliance with legal obligations to which the Controller is subject;

– For the specific purpose of disclosing data to third parties, the legal basis is consent under Article 6, paragraph 1, point A) GDPR.

3.2. With regard to the processing of sensitive (so-called special categories of) personal data that may be collected:

– With reference to special categories of personal data collected on the basis of regulatory provisions, such as medical certificates of physical fitness for sporting activity, the legal basis is Article 9, paragraph 2, letter G) GDPR as the processing of such data is necessary for reasons of substantial public interest, on the basis of Union or Italian law.

3.3. With regard to the processing of images, audio and/or video:

– With reference to the publication and/or dissemination of images, audio and/or video through the channels indicated in point 2 of this Privacy Policy, as well as for the purpose of storing said images, audio and/or video in the Foundation's computer filing system for the time specifically identified to meet the purposes set out in point 2, the legal basis is consent pursuant to Article 6, paragraph 1, point A) GDPR.

4. MODALITIES OF DATA PROCESSING.

Processing will take place in paper form and by electronic, computer or automated means. In particular, in the case of printouts, they will be stored in locked locations, the key to which is held by the Foundation's employees, or electronically on PCs located at the Foundation's premises that are adequately protected against cybercrime risks (access credentials and passwords, firewalls, antivirus, periodic data backup).

Processing is carried out by the Controller and/or the Controller's collaborators as persons in charge of the processing, as well as by the Processors specifically identified in writing, within the scope of their respective functions and as instructed by the Controller, ensuring the use of appropriate measures to protect the security of the data processed and their confidentiality.

According to the Regulation, the processing carried out by the Controller will be based on the principles of lawfulness, fairness, transparency, purpose limitation and storage limitation, data minimisation, accuracy, integrity and confidentiality.

The data will be treated at all times in strict compliance with the principle of confidentiality, even in the event that data are handled by third parties expressly appointed by the Controller.

Your data will not be subject to any automated decision-making process.

The images, voice recordings and films will be properly stored at the Foundation's designated premises. The images used will be relevant to the content of the publication. No information of a personal nature will be attached to the images, audio and video.

The Controller is not responsible for the use that third parties may make of the images after publication.

5. PERSONAL DATA RECIPIENTS.

The personal data you provide may be disclosed to the Controller, the persons in charge and/or the Processors. The list of Processors is available on request.

Possible further categories of recipients to whom your personal data may be disclosed during or after the performance of the contract include:

a) parties that process data in accordance with specific legal obligations;

b) sports bodies/federations with which the Controller is affiliated;

c) banking institutions that provide services conducive to the purposes set out in point 2;

- d) the insurance company with which the Controller takes out insurance cover;
- e) consultants, external professionals and companies providing services conducive to, deriving from or connected with the purposes set out in point 2, identified in writing and to whom specific written instructions have been given with regard to the processing of personal data;
- f) parties that typically manage image dissemination channels (web agencies for online publication or communication agencies for the creation of brochures and flyers);
- g) potential members or those interested in the Foundation's activities;
- h) professional video makers and photographers;
- i) local magazines or daily newspapers relating to events in which the Foundation was an active participant;
- j) in general, all those public and private parties to which disclosure is necessary to fulfil the purposes set out in point 2.

6. DISCLOSURE OF DATA.

Your data may be disclosed to the parties indicated in point 5 for the purposes set out in point 2 and, in general, for the tasks connected with the performance of the Foundation's activities.

7. DISSEMINATION OF DATA.

Unless specifically requested by you in writing or specifically ordered by a Data Protection Authority/the law, your personal data will not be disseminated. In any case, your sensitive (so-called special categories of) personal data may not be disseminated.

8. TRANSFER OF DATA ABROAD.

The data collected will not be transferred to third countries or international organisations.

9. STORAGE PERIOD.

9.1. With regard to the storage period for personal data relating to participants in events/competitions held by our Foundation: the data you provide will be stored throughout the period of participation and thereafter for a period of ten years from the end of that participation, in order to fulfil tax and accounting obligations, as well as for legal protection in the event of disputes arising from your participation in events organised by our Foundation.

The obsolescence of the data being processed in relation to the purposes for which they have been collected and processed will be checked periodically.

With regard to processing based on consent, data will be stored until consent is withdrawn.

Images, audio and video will be stored until consent is withdrawn.

10. RIGHTS OF THE DATA SUBJECT.

The legislation entitles the Data Subject to exercise specific rights listed in Articles 15 to 22 GDPR, including the right to obtain confirmation from the Data Controller of the existence of one's own personal data (i.e. access to them), to have them made available in an intelligible form, and to have them rectified or deleted, or to restrict their processing in whole or in part, or to object to their processing for legitimate reasons, and/or to withdraw consent to their processing at any time (without prejudice to the consequences indicated in the points above), or to request the portability of one's own data with regard to data that require specific consent, or to have them updated.

The Data Subject has the right to be informed of the origin of the data, the purposes and modalities of the processing, the logic applied to the processing, the identification details of the Controller and of the persons to whom the data may be disclosed.

The Data Subject also has the right to request the anonymisation, restriction or blocking of data processed in violation of the law; he/she may also lodge a complaint regarding the unauthorised processing of data with the Italian Data Protection Authority in the manner published on the website of that authority (see <http://www.garanteprivacy.it/>).

Requests relating to the exercise of the aforementioned rights may be addressed to the Controller directly at the above-mentioned addresses, either without any formality or using the form prepared by the Italian Data Protection Authority, available at <http://www.garanteprivacy.it>

The aforementioned rights may be exercised by written notice to be sent via certified email to the Controller's PEC address trofeomezzalama@pec.it or via registered letter with return receipt to the above-mentioned entity.

11. PROVISION OF DATA.

The provision of personal data necessary for participation in events/competitions is not mandatory; however, it is a requirement for registration and for the proper fulfilment of contractual and pre-contractual obligations arising therefrom. The Controller points out that you will only be asked to provide those data that are strictly necessary to execute the contract and fulfil the obligations or legal obligations arising therefrom.

12. REFUSAL TO PROVIDE DATA.

Failure to provide data on the part of the Data Subject will prevent him/her from entering into the contract and/or participating in the event/race, as well as result in the impossibility of taking the necessary pre-contractual measures and correctly fulfilling contractual obligations and any obligations (including legal ones) arising from or in connection with the contract and, more generally, the impossibility of fulfilling the purposes set out in point 2.