



**INFORMATION PURSUANT TO ARTICLES 13-14 GDPR
REGARDING THE PROCESSING OF PERSONAL DATA**

Website

December 2024 version

1. INTRODUCTION

For Ente Cambiano S.c.p.A, with registered office in Piazza Giovanni XXIII n. 6, 50051 Castelfiorentino (FI), P. IVA 00657440483, (following “Service’s owner” or just “Owner”), the privacy and safety of your personal data is of particular importance. For this reason they are collected and treated with the utmost care and attention, adopting specific organizational and technical measures to ensure their full safety.

We inform you that, in accordance with the clauses 13 and 14 of the General Data Protection Regulation (GDPR) n. 679/2016, the use of personal data from the Web Site www.cambiocentriculturale.it will be carried out according to what is described below, and that informations contained there do not concern other Web Sites, pages or online services reachable through links published on the Web Site but referring to external resources.

For this purpose, we specify as of now that for the tickets’ online purchase you will be directed to the page of a specific Company which will process your personal data as the independent Owner of the service and to whose privacy information please refer in full.

This notice is provided in accordance to the clause 14 GDPR, since it might be possible that some personal data will be found from different sources (see “Contacts” on the current notice). It’s your responsibility to inform the subjects whose personal data you may communicate to us and to request their consent to the processing, where necessary.

2. PERSONAL DATA PROCESSING’S OWNER AND DPO CONTACT’S INFORMATION

The processing’s owner is Ente Cambiano S.c.p.A, with registered office in Piazza Giovanni XXIII n. 6, 50051Castelfiorentino (FI), P. IVA 00657440483.

Contacts are: a) e-mail: info.ente@entecambiano.it; b) PEC: pec@pec.entecambiano.it; c) telephone: 05711657080.



The Data Protection Officer (*DPO*) can be contacted by those interested in all issues related to the processing of their personal data and to the exercise of their rights deriving from GDPR at the following contact: privacy@bancacambiano.it

3. TYPE OF PERSONAL DATA

Personal data that will be processed can include:

- 1.** Identifying data, such as personal data like name, surname, e-mail address, phone number
"Identifying data, such as personal data like name, surname, e-mail address, phone number (as a non-exhaustive example)"
- 2.** Web surfing data: personal information implicitly transmitted during the use of Internet communication registry (IP address, country of location, domain names in the computer, Uniform Resource Identifier (*URI*) addresses for the resources requested on web sites, time of requests, method used to send the requests to the server, size of the file obtained as a response to a request, numeric code indicating the response condition – fine, error, etc..). These are information collected by the web site and that help its functioning. We inform you that these personal data are used by the Owner with the sole purpose of acquiring anonymous statistical information, as well as controlling the right functioning and to identify potential malfunctioning and/or abuses. These personal data last for a maximum of seven days, unless it's necessary to identify those responsible of hypothetical cyber crimes against the Owner or third party.
- 3.** Cookies: small text files that web sites send to the device (personal computer, smartphone, tablet, etc..) where the information are memorized and transmitted to the same sites for the next visit. The web site uses exclusively technical cookies, strictly necessary for the site's functioning and not used for additional purpose. As required by the Injunction n. 231 of the 10th of June 2021 from the Italian Personal Data Protection Authority, the Owner of the data processing is committed to provide a specific notice, eventually included in the general one, defining the use of cookies in a codified hypothesis of exemption from the obligation to obtain the consent of the interested party. Below you can find the table with the technical cookies used.

Further personal data communicated by you through the section "contacts" on the Web Site could be processed. In that case, we suggest you to provide the personal data strictly necessary for that purpose. If these data belong to third parties, we remind you that it is your responsibility to inform them of the processing described in this notice, even by delivering/displaying it, and ask them consent for the processing of the data, if necessary.

4. AIMS AND LEGAL GROUNDS FOR PROCESSING, NATURE OF DATA PROVISIONING AND RELATIVE STORAGE PERIOD

This paragraph will describe the aims and relative legal grounds for personal data processing, the nature of provisioning, and the storage period.

1. Web Site browsing. Purposes: to allow Web Site browsing and consultation. Legal grounds: Owner's legitimate interest in accordance with art. 6 par. 1 lett. f) GDPR.

Nature of provisioning: necessary in order to carry out Web Site browsing. Failure to provide entails the inability to browse. Storage period: for the entire duration of the browsing session and for a maximum period of up to seven days, notwithstanding an additional period if it is necessary to the investigation of potential cyber crimes.

2. Contacts. Purposes: to contact the Owner via the dedicated section on the Web Site. Once clicked on the dedicated section, you will be able to contact the Owner via e-mail. For what concerns personal data processing relative to the use of your chosen e-mail service provider, please refer to said subject's specific privacy policy. Legal grounds: to respond to your request in accordance with art. 6 par. 1 lett. b) GDPR (implementation of pre-contractual or contractual measures taken upon request by the interested party). Nature of provisioning: necessary in order to contact the Owner. Failure to provide personal data or only partially providing them may prevent the Owner from being able to respond adequately. Storage period: for the duration necessary to respond to your requests and for a maximum period of up to two years once the Owner has responded. When providing a third party's personal data, please refer back to what has been stated above about the obligation to provide information and the eventual consent.

3. Newsletter. Purposes: to send you commercial communications related to the Owner's activity, via subscription to the newsletter. Legal grounds: your consent in accordance with art. 6 par. 1 lett. a) GDPR. Nature of provisioning: optional, and failure to comply does not compromise the other aims of the processing. Storage period: twenty-four months starting from the expression of consent or its renewal. In any case, you will be able to withdraw consent at any given moment, according to what is stated in paragraph "Rights of the interested subject" in this policy.

4. Communication of personal data to Commercial Partners of the Owner. The list of said subjects can be requested to the Owner by contacting them using the contact information provided in this policy. Purposes: to communicate your personal data to the Owner's Commercial Partners in order for them to be able to contact you and send you commercial communications related to their activity. Legal grounds: your consent in accordance with art. 6 par. 1 lett. a) GDPR. With reference to the withdrawal of consent, please refer to paragraph "Rights of the Interested Party" in this policy. Nature of provisioning: optional, and failure to comply does not compromise the other aims of the processing. Storage period: once you have expressed your consent, the data will be transferred to the Commercial Partners which will treat them autonomously as Owners of the processing,

establishing the related timing of conservation in full autonomy. You can communicate withdrawal of consent to Ente Cambiano S.c.p.A, which will forward it to each of the Commercial Partners.

5. Legal obligations. Purposes: Personal Data gathered for other purposes are also treated to comply with legal obligations to which the Owner is subjected. Legal grounds: art. 6 par. 1 lett. c) GDPR, since the processing is necessary to comply with legal obligations to which the Owner is subjected. Nature of provisioning: once provided, the data gathered for other purposes will also be treated to comply with said legal obligations. Storage period: according to the obligations imposed by law and, in any case, for a maximum period of up to ten years starting from the last contact with the Owner. In case of consent withdrawal, treatments with said legal grounds will be interrupted, but your personal data will still be stored for the subsequent period as required by the Legislation, with the purpose of proving the lawfulness of treatments based on the consent that the Owner has established in ten years from the withdrawal;

6. Technical cookies. Purposes: The Web Site exclusively employs the technical cookies listed in the table below. Said cookies are strictly necessary to the functioning of the Web Site and are not used for any ulterior purpose. Legal grounds: Owner's legitimate interest in accordance with art. 6 par. 1 lett. f) GDPR. Nature of provisioning: necessary to carry out Web Site navigation. Storage period: see what stated below.

The table summarizing the cookies used by this Web Site is provided below.

Name	Function	Duration
_icl_visitor_lang_js	It memorizes the user's preferred language to display the contents in the correct language at the following access.	24 hours
wpml_browser_redirect_test	It verifies if the browser supports automatic redirecting based on the browser's language.	Browser's session (is deleted when closing the broser)
_icl_current_language	It memorizes the language currently selected by the user.	24 hours
icl_current_admin_language{hash}	It memorizes the language selected in the administrative area of WordPress for the user.	24 hours

By modifying the settings of their own internet browser, the User can edit the cookies settings and choose not to install any kind of cookie. However, this choice might affect your experience of the Site and of the service we can offer. The browser settings relative to the cookies are accessible and editable by the User (either manually or by using specific tools) in "settings", "tools" or "preferences" belonging to the specific browser's internet menu. It is possible to consult the item "help" in the browser menu. In any case, each browser's configuration is different and is described in its "Guide" menu. For further details on how to handle cookies settings, please refer to the links below:



- Google Chrome
- Mozilla Firefox
- Microsoft Edge
- Opera
- Safari

With regard to online purchase of tickets, please refer to the privacy policy of the Society on whose Web Site the purchase will be carried out. We inform you that in specific cases showing the ticket might be requested in order to be allowed to the event. In that case, a specific policy will be provided at the event's venue.

Personal data, whether necessary and only after providing them for the purposes stated above, might be treated to ascertain, exercise or defend a right of the Owner, on the basis of the Owner's legitimate interest in accordance with art. 6 par. 1 leL. f) GDPR. In that case, the personal data will be stored until the end of the eventual procedure, that is, until the judicial ruling is made executive and, anyway, until it has produced its legal effects.

5. METHODS OF PROCESSING AND TECHNICAL AND ORGANIZATIONAL SECURITY MEASURES

Processing of personal data will be carried out in compliance with the principles of lawfulness, fairness, transparency, finality, quality, pertinence and minimization determined by art. 5 GDPR, using logics strictly related to the purposes stated, and methods that guarantee their security and confidentiality, via the adoption of adequate measures to prevent alteration, deletion, destruction, unauthorized access or data processing that is non permitted or non-compliant to the purposes of the gathering, in compliance with art. 32 GDPR. The Owner adopts adequate and preventive security measures designed to preserve the confidentiality, integrity, completeness and availability of the interested party's personal data. Technical, logistical and organizational measures are put in place in order to prevent damages, losses (even accidental), alterations, improper and unauthorized uses of the personal data that are processed.

6. RECIPIENTS OF PERSONAL DATA

Within the Owner's organizational structure, those who have been expressly named Appointed to the processing of data in accordance with art. 2 quaterdecies D. Lgs. 196/2003 can have access to personal data, that is, people Authorized to the processing of data by art. 29 GDPR. Such subjects operate on the basis of specific instructions by the Owner of the processing. To provide the services aforementioned, the Owner of the processing can entrust your Personal Data to various service providers, with whom they have signed a specific deed of appointment as Manager of the processing (art. 28 GDPR), aimed at respecting the legislation and safeguarding your personal data. With this deed, the Owner has provided specific instructions relative to the processing of personal data. To these subjects the Owner has entrusted, by way of example and non-exhaustive, the following

services: a) creation, management and maintenance of the Web Site; b) management of the users database; c) newslettering service; etc. The Owner might need to communicate your personal data to other third parties; by way of example and non-exhaustive: consultants in specific subject matters (company compliance), lawyers for legal actions, etc. Such subjects may treat your personal data, as appropriate, on the basis of a specific deed of appointment as Manager of the processing in accordance with art. 28 GDPR (see above), that is, as autonomous Owners of the processing. The Owner might also communicate your personal data to Institutions, Authorities, and, in general, to Subjects to whom communication is requested by norms, legal provisions and/or orders from Authorities. Such subjects will act as autonomous owners of the processing. Subject to your consent, as described in the present policy, your personal data may be communicated to commercial Partners. Such subjects will operate as autonomous Owners of the processing and will provide you with a specific Policy according to the Legislation. A full listing of the Managers of the processing and the Commercial Partners is available upon request to the Owner at the contact information given in this Policy.

7. TRANSFERRING DATA OUTSIDE OF THE EU

The Owner does not transfer your data to non-EU Countries. On the off chance that some of the third party subjects might be located in or use Clouds based in non-EU Countries, we inform you that it has been verified that these Countries offer an adequate level of data protection, as per the dedicated European Commission decisions.

The transfer of personal data to third party subjects resident or based in non-EU Countries that do not guarantee adequate levels of protection will only be carried out prior consent by the interested party or prior signing of specific agreements between the Society and said subjects. These agreements must contain safeguarding clauses and appropriate warranties for the protection of personal data – so-called “standard contractual clauses” – also approved by the European Commission, that is, in case the transfer is necessary to the conclusion and execution of the contract between the Society and the interested party or to the handling of their requests.

8. RIGHTS OF THE INTERESTED PARTY

We inform you that you are entitled to exercise the following rights, with regard to the treatments of personal data described in this policy, as provided for and guaranteed by the GDPR:

- a) **Right to access and rectify** (artt. 15 e 16 GDPR): you have the right to access your personal data and ask for them to be corrected, modified or integrated. If you wish, we will provide you with a copy of your data in our possession.

- b) **Right to delete data** (art. 17 GDPR): in the cases stated by current law, you can ask for your personal data to be deleted. Once your request has been received and analyzed, we will take care of terminating the processing and delete your personal data, if deemed legitimate.
- c) **Right to limitation of processing** (art. 18 GDPR): you have the right to request limitation of processing of your personal data, in the case of illicit treatments or contestation of the accuracy of the personal data.
- d) **Right to data portability** (Art. 20 GDPR): you have the right to request your personal data from the Owner of the processing in order to transmit them to another Owner, in the cases laid down in the aforementioned article.
- e) **Right to object** (Art. 21 GDPR): you have the right to object at any moment to the processing of your personal data carried out on the basis of our legitimate interest, by explaining the reasons that justify your request; before granting it, the Owner will have to assess the reasons of your Request.
- f) **Right to lodge a complaint** (Art. 77 GDPR): you have the right to lodge a complaint to the competent protection authorities for the protection of your personal data if you think that a violation of your right concerning your personal data has occurred or is occurring.
- g) **Right to withdraw the consent given** (Art. 7 GDPR): for the processing of personal data that lay their legal grounds exclusively on your consent, you have the right to withdraw the consent given at any time, by contacting the Owner of the processing using the contact information stated above. With respect to the newsletter, you can also withdraw your consent by clicking on the dedicated unsubscribing button that is in the promotional communication. Withdrawal of consent does not affect the lawfulness of the processing before the withdrawal.

You can exercise your rights at any time, by contacting the Owner of the Treatment using the contact information stated in this policy.

9. CHANGES TO THIS POLICY

This policy may undergo changes and integrations over time, if deemed necessary by reason of new regulatory measures in terms of personal data protection, that is, the evolution/modification of the Owner's operability.