



Fondazione
Internazionale
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Privacy Policy

ex artt. 13 e 14 GDPR

This privacy policy ("Policy") is provided to you pursuant to Regulation (EU) 2016/679 ("GDPR"), Legislative Decree 196/2003 and subsequent amendments ("Privacy Code"), as well as the relevant provisions and guidelines of national and European data protection authorities by LUMEN ETS International Foundation (hereinafter also "Data Controller" or "Foundation").

Identity and contact details of the Data Controller

LUMEN ETS International Foundation – strada provinciale per Polignano 5/13 - 29010 - San Pietro in Cerro (PC), C.F.91130600330, tel. +39 0523 838172. The Data Controller can be contacted by regular mail or by email at: privacy@fondazionelumen.eu

Source and type of personal data processed

Personal data is collected directly from the interested party and consists of: name, surname, and email address, any bank details (e.g., IBAN or credit card number), and other data contained in the forms and/or otherwise communicated during relationships with the Foundation. For example, these data are processed for:

- make a donation to the Foundation,
- become a Foundation volunteer and/or join other Foundation projects
- register in the reserved area of the Foundation's website, and/or

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tel. + 39 0523 838 172
www.fondazionelumen.eu
Entity registered in the RUNTS n. 119372 of
24/05/2024

Strada provinciale per Polignano 5/13
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- ask to receive the Foundation's informational or promotional material

Depending on the case, the following personal data is also collected: address, city, and telephone number. These data are used, for example, to manage volunteers' operations, individual initiatives, or, with express consent, to send informational communications and institutional materials from the Foundation.

This data is necessary to process your requests and follow up on them by carrying out the necessary activities, such as, for example, sending you the documentation needed to report and manage your donation, considering your application as a volunteer and/or for one or more Foundation initiatives and sending you subsequent organizational communications, creating your account on the Foundation's website, and/or sending you Foundation informational materials. Depending on the case, the data will also be processed to send you institutional communications about the activities and initiatives organized by the Foundation.

Finally, with specific reference to donations and where you complete such donation through digital payment solutions (e.g., PayPal, Stripe, etc.), the Data Controller may also receive some of your personal data (e.g., address, city, and telephone number) through the payment solution you use, it being understood that the data will always be collected directly from you.

Purpose of processing and legal bases

The Data Controller processes your personal data for the following purposes and in the presence of the following legal bases:

1. for the correct management of your requests, including donations, volunteer applications and requests to join the Foundation's institutional projects, registrations on

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- the website, and/or requests to receive informational material (including, for example, promotional documentation, newsletters, etc.) from the Foundation (art. 6(1)(b) GDPR);
2. Purpose of promoting and disseminating the Foundation's institutional activities, consisting of sending—via regular mail, email, and, where you have chosen to provide your telephone number, via text message, phone call, or instant messaging (e.g., WhatsApp)—promotional materials and communications containing information regarding the Foundation's projects, initiatives, and institutional activities. For this purpose, your personal data will be processed based on the Data Controller's legitimate interest in maintaining the relationship established through (a) your donation, (b) your application to volunteer, and/or (c) your registration on the Foundation's website, given that, by making such requests, you have expressed your appreciation and acceptance of our principles and our support for medical and scientific research (Article 6, paragraph 1, letter f, GDPR). Furthermore, only where you have given your specific consent, you may also be contacted via instant messaging channels managed directly by the Foundation (Article 6, paragraph 1, letter a, GDPR);
 3. for the fulfillment of the legal obligations to which the Data Controller is subject in relation to the management of your donation (art. 6(1)(c) GDPR);
 4. To protect the rights of the Foundation or a third party in court proceedings for the detection, prevention, and suppression of crimes (Article 6, paragraph 1, letter f) of the GDPR). For this purpose, your data will be processed based on the Data Controller's legitimate interest in protecting its legal position and its rights and interests.

Mandatory or optional nature of providing data and consequences in case of failure to provide it

The data collected for the purposes referred to in point 2) of the previous paragraph will be processed only with your free, specific, informed, and unambiguous consent. Providing your



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personal data for this purpose is optional, but failure to provide consent—or revocation of consent, if initially provided, and/or the exercise of your right to object to processing based on the Foundation's legitimate interest (processing point 2 above)—will prevent you from receiving communications relating to the Foundation's institutional activities. Providing your personal data for the purposes referred to in points 1), 3), and 4) of the previous paragraph is optional, but necessary to allow the Data Controller to effectively manage your request and adequately respond to it (e.g., record and manage your donation). Failure to provide such data will therefore prevent the Data Controller from providing you with the requested service.

Treatment methods

Personal data is processed by the Data Controller primarily using electronic means and is stored within its IT systems. Appropriate security measures are adopted to prevent data loss or alteration—even accidental—, unlawful or incorrect use, and unauthorized access.

Data controllers and independent data controllers

Your personal data may also be disclosed to the following categories of third parties:

- public bodies, institutional bodies, law enforcement agencies, supervisory authorities and the judiciary upon their express request or if required by law or regulation;
- Parties that support the Foundation in pursuing its statutory purposes. For example, these include parties that are directly responsible for sending informational communications or that offer the Data Controller services related to the management, development, and maintenance of IT systems, messaging systems, or newsletter delivery (such as Getresponse).

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Depending on the case, these entities may act as independent data controllers or as data processors, pursuant to specific instructions from the Foundation. A list of these entities can be requested by writing to the Data Controller at the contact details provided in this policy.

If you become a Foundation volunteer, some of your contact information may also be shared with other volunteers assigned to the same activity or participating in the same initiative, so that they can organize and manage the event you choose to participate in.

Data retention period

Depending on the purposes of data processing (paragraph, "*Purpose of processing and legal bases*") the retention period determined is as follows:

1. For the purposes referred to in point 2, your data will be processed until you decide to object to the processing and/or revoke your consent. However, if it is clear that you have lost interest in receiving communications from the Foundation, your data will be deleted or made anonymous.
2. for the purposes referred to in points 1 and 3, the data will be retained for the time strictly necessary to pursue such purposes, in any case not exceeding the applicable limitation period, unless it is necessary to retain them for a longer period in order to comply with a legal obligation, an order from an Authority or to defend a right of the Data Controller (e.g. in the event of ongoing litigation);
3. For the purposes referred to in point 4, the data will be processed for the period necessary to resolve any disputes; after their conclusion, they will be retained with appropriate security measures until the applicable statutory limitation period.



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Place of processing and data transfer to non-EU countries

The processing, including storage, of personal data takes place on servers owned by the Data Controller and/or third-party companies duly appointed as data processors, located within the European Economic Area ("EEA"). However, your personal data may be transferred outside of the EEA. If this occurs to countries not subject to an adequacy decision by the European Commission, appropriate transfer mechanisms will be adopted and, if necessary, additional measures to ensure that personal data enjoys a level of protection essentially equivalent to that guaranteed in the EU, in accordance with Chapter V of the GDPR.

Data subject rights pursuant to Articles 15-22 of the GDPR

By writing to the LUMEN ETS International Foundation at the postal address of Strada Provinciale per Polignano 5/13 - 29010 -- San Pietro in Cerro (PC) or at the email address privacy@fondazionelumen.eu, you may exercise the rights of access, rectification, portability, erasure, restriction of processing, objection to processing for legitimate reasons, and withdrawal of consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. We also remind you that you may withdraw your consent and/or object to processing based on the Foundation's legitimate interests, including by clicking on the links at the bottom of each communication, or by expressing your privacy preferences through the instant messaging channels used by the Data Controller.

Complaint to the Supervisory Authority

The interested party has the right to lodge a complaint with the Supervisory Authority, which in Italy is the Guarantor for the Protection of Personal Data – Piazza Venezia 11, 00187 Rome (RM) – www.garanteprivacy.it, email: protocollo@pec.gpdp.it, using the form available at:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524&zx=e0yn0riezmmw>

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