

Privacy & Cookies

PRIVACY POLICY

Data Controller

Your Data is processed by OpenCom issc, located in Arezzo, at Piazza Giotto, 13, as the data controller hereinafter referred to as the “Controller”.

Types of Data Collected

Among the Personal Data collected by <https://www.opencom-italy.org/>, independently or through third parties, are: name, surname, phone number, email, Cookies, and Usage Data. Complete details on each data collection type are provided in the dedicated sections of this privacy policy or through specific explanatory texts displayed before the data collection.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically during the use of <https://www.opencom-italy.org/>. If specified, all Data requested by <https://www.opencom-italy.org/> is optional. The refusal to provide such Data may make it impossible for our website to provide the Service. In cases where <https://www.opencom-italy.org/> indicates some Data as optional, Users are free to refrain from communicating such Data without this having any consequences on the availability of the Service or its operation.

Users who doubt which Data are mandatory are encouraged to contact the Controller.

Any use of Cookies or other tracking tools by <https://www.opencom-italy.org/> or by the owners of third-party services used by our website, unless otherwise specified, is intended to provide the Service requested by the User, in addition to the other purposes described in this document and in the Cookie Policy, if available.

The User assumes responsibility for the Personal Data of third parties obtained, published, or shared through <https://www.opencom-italy.org/> and guarantees they have the right to communicate or disseminate them, releasing the Controller from any liability to third parties.

Methods and Place of Processing of the Collected Data

Processing Methods

The Controller adopts appropriate security measures to prevent unauthorized access, disclosure, modification, or destruction of Personal Data. The processing uses computers or IT-enabled tools, with organizational methods and logic strictly related to the purposes indicated. In addition to the Controller, in some cases, the Data may be accessible to certain types of persons in charge involved with the operation of the website (administration, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies, cooperative societies) also appointed, if necessary, as Data Processors by the Controller under Article 28 of Regulation EU 2016/679. An updated list of these Data Processors may be requested from the Controller at any time.

Legal Basis of Processing

The Controller processes Personal Data relating to the User if one of the following conditions exists:

- the User has given consent for one or more specific purposes.
- Note: in some jurisdictions, the Controller may be authorized to process Personal Data without the User's consent, or another legal basis specified below, as long as the User does not object ("opt-out") to such processing. However, this is not applicable if the processing of Personal Data is governed by European data protection legislation.
- the processing is necessary for the performance of a contract with the User and/or any pre-contractual obligations thereof.
- the processing is necessary for compliance with a legal obligation to which the Controller is subject.
- the processing is necessary for the performance of a task carried out in the public interest or the exercise of official authority vested in the Controller.
- the processing is necessary for the legitimate interests pursued by the Controller or by a third party.

In any case, it is always possible to ask the Controller to clarify the specific legal basis of each processing and to specify whether the processing is based on the law, provided for by a contract, or necessary to conclude a contract.

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Place

The Data is processed at the Controller's operating offices and other places where the parties are located. For further information, please get in touch with the Controller. The User's Personal Data may be transferred to a country other than the one in which the User is located. To obtain further

information on the processing location, the User can refer to the section concerning the processing of Personal Data.

The User has the right to obtain information regarding the legal basis for transferring Data outside the European Union or to an international organization of public international law or established by two or more countries, such as the UN, as well as regarding the security measures adopted by the Controller to protect the Data.

If one of the transfers takes place, the User can refer to the respective sections of this document or request information from the Controller by contacting him/her at the contact details provided in the opening section.

Retention Period

The Data is processed and stored for the time required by the purposes for which it was collected.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Controller and the User will be retained until such contract has been fully performed.
- Personal Data collected for purposes related to the Controller's legitimate interests will be retained until such interests have been fulfilled. The User may obtain further information regarding the legitimate interests pursued by the Controller in the relevant sections of this document or by contacting the Controller. At the end of the retention period, Personal Data will be deleted. Therefore, upon this period's expiration, the right to access, erasure, rectification, and data portability cannot be exercised anymore. The User's Data is collected to allow the Controller to provide its Services and for the following purposes: Contacting the User and Analytics.

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

Details on the Processing of Personal Data

To obtain further detailed information on the purposes of the processing and the Personal Data that is specifically relevant for each purpose, the User may refer to the respective sections of this document.

Purpose of the Data Processing

When the processing is based on the User's consent, the Controller may keep the Personal Data longer until such consent is revoked. Moreover, the Controller may be obliged to keep the Personal Data for a longer period in compliance with a legal obligation or an order from an authority.

Online Services

The User can use all the online services available on the Controller's website, which always guarantees the confidentiality of the personal information provided and its use only for the purposes declared by the Controller. According to Art. 9 of EU Regulation 2016/679 (sensitive and judicial), the collected data is personal but not of particular categories.

Analytics

The services contained in this section allow the Controller to monitor and analyze traffic data and are used to track the User's behaviour.

Google Analytics is a web analysis service provided by Google Inc. ("Google").

Google uses the Personal Data collected to track and examine our website's use, prepare reports, and share them with other services developed by Google. Google may use Personal Data to contextualize and personalize the ads of its advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out. Subject to Privacy Shield.

User's rights

Users can exercise certain rights regarding the Data processed by the Data Controller.

In particular, the User has the right to:

- **Withdraw consent at any time.** The User can withdraw consent to processing their Personal Data previously expressed.
- **Object to processing of their Data.** The User can object to processing their Data when it occurs on a legal basis other than consent. Further details on the right of objection are indicated in the section below.
- **Access their Data.** The User has the right to obtain information on the Data processed by the Controller, on certain aspects of the processing, and to receive a copy of the processed Data.
- **Verify and request rectification.** The User can verify their data's correctness and request their update or correction.
- **Obtain the limitation of processing.** When certain conditions occur, the User may request the limitation of their data processing. In this case, the Controller will not process the Data for any other purpose than their storage.
- **Obtain the erasure or removal of their Data.** When certain conditions occur, the User may request the erasure of their Data by the Controller.
- **Receive their Data or have them transferred to another controller.** The User has the right to receive their Data in a structured, commonly used, and machine-readable format and, where technically feasible, to transmit them without hindrance to another controller. This provision is applicable when the Data is processed by automated means, and the processing is based on User consent, on a contract to which the User is a party or on contractual measures connected to it.
- **Complain.** The User can complain to the competent data protection supervisory authority or act in court.

Details on the right to object

When Personal Data is processed in the public interest, in the exercise of public powers vested in the Data Controller, or to pursue a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons related to their situation.

Users are reminded that if their Data is processed for direct marketing purposes, they can object to the processing without providing any justification. To find out if the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

How to exercise rights

To exercise their rights, Users may request the contact details of the Data Controller indicated in this document. Requests are made free of charge and processed by the Data Controller as soon as possible, in any case within one month.

Further information on data processing

Legal defense

The User's Personal Data may be used by the Owner in court or in the stages leading to possible legal action arising from its improper use or that of related services by the User. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Specific information notices

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

System logs and maintenance

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

Information not contained in this policy

More information on processing Personal Data may be requested from the Owner at any time using the contact information provided.

Do Not Track requests

This website does not support "Do Not Track" requests. To determine whether any third-party services it uses to support them, the User is advised to consult their respective privacy policies.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to Users on this page, and possibly within this website and/or – as far as technically and

legally feasible – sending a notice to Users via any contact information available to the Owner. Therefore, please check this page regularly, referring to the last modification date listed at the bottom.

If the changes affect processing activities whose legal basis is consent, the Owner shall collect new consent from the User, if necessary.

Definitions and legal references

Personal Data (or Data): Any information that, directly or indirectly, even in connection with any other information, including a personal identification number, makes a natural person identified or identifiable.

Usage Data: Information collected automatically through our website (including from third-party applications integrated into it), including IP addresses or domain names of the computers used by the user, URI addresses (Uniform Resource Identifier), time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), the country of origin, the characteristics of the browser and operating system used by the visitor, the various time details of the visit (e.g., the time spent on each page) and the details of the itinerary followed within the Application, with particular reference to the sequence of pages visited, the parameters relating to the operating system and the User's IT environment.

User: The individual who uses our website, 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 which processes Personal Data on behalf of the Controller, as described in this Privacy Policy.

Data Controller (or Controller): The natural or legal person, public authority, service, 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 our website.

<https://www.opencom-italy.org/> (or this Application): The hardware or software tool by which Users' Personal Data is collected and processed.

Service: The service provided by <https://www.opencom-italy.org/> as described in the relevant terms (if available) on this website/application.

European Union (or EU): Unless otherwise specified, any reference to the European Union contained in this document shall be deemed to include all current member states of the European Union and the European Economic Area.

Legal references: This Privacy Policy is based on multiple legislative systems, including Articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this Privacy Policy relates exclusively to <https://www.opencom-italy.org/>.

Data Controller:

OpenCom issc, Piazza Giotto n. 13 – 52100 Arezzo (AR) – info@opencom-italy.org

Cookies comprise portions of code installed in the browser that assist the Controller in providing the service according to the purposes described. Some purposes for which Cookies are installed may also require the User's consent.

COOKIES POLICY

Technical and aggregated statistical cookies; the cookies used are divided into:

Activities strictly necessary for the functioning (technical):

This website uses cookies to save the User's session and to perform other activities strictly necessary for its functioning, for example, concerning traffic distribution.

Preference-saving, optimisation and statistics activities

This website uses cookies to save navigation preferences and optimize the user's browsing experience. These cookies include, for example, those to know the number and origin of visitors, set language and currency or statistics management by the website owner.

Other types of cookies or third-party tools may use them

Some services listed below collect statistics in aggregate form and may not require the user's consent or may be managed directly by the Owner – depending on how described – without the help of third parties. If third-party tools are listed below, they may – in addition to what is specified and without the Owner's knowledge – perform User tracking activities. For more detailed information, it is recommended to consult the privacy policies of the listed services.

Interactions with social networks and external platforms

These services allow interactions with social networks or other external platforms directly from the pages of the Application. The interactions and information acquired by this Application are, in any case subject to the User's privacy settings for each social network. If an interaction service with social networks is installed, it is possible that, even if Users do not use the service, it may collect traffic data relating to the pages on which it is installed.

Twitter Tweet button and social widgets (Twitter)

The Twitter Tweet button and social widgets are services for interacting with the Twitter social network, provided by Twitter Inc. Personal data collected: Cookies and Usage Data. Place of processing: USA – Privacy Policy.

- **Facebook Like button and social widgets (Facebook, Inc.) The Facebook Like button and social widgets are services for interacting with the Facebook social network, provided by Facebook, Inc. Personal data collected: Cookies and Usage Data. Place of processing: USA – Privacy Policy.**
- **Google+ +1 button and social widgets (Google) The Google+ +1 button and social widgets are services for interacting with the Google+ social network, provided by Google Inc. Personal data collected: Cookies and Usage Data. Place of processing: USA – Privacy Policy.**

Infrastructure monitoring

These services allow this site to monitor the usage and behaviour of its components, improve performance and functionality, perform maintenance, or troubleshoot issues. The Personal Data processed depends on the characteristics and mode of implementation of these services, which by their nature, filter the activity of this Application.

Statistics

The services in this section allow the data controller to monitor and analyze traffic data and track user behaviour.

Google Analytics is a web analytics service provided by Google Inc. (“Google”). Google uses personal data collected to track and examine the use of this application, compile reports, and share them with other Google services. Google may use personal data to contextualize and personalize advertisements within its advertising network. Personal data collected: Cookies and Usage Data. Processing location: USA – Privacy Policy – Opt Out

Displaying content from external platforms

These services allow the display of content hosted on external platforms directly from the pages of this application and interact with them. If a service of this kind is installed, it may collect traffic data related to the pages where it is installed, even if users do not use the service.

YouTube Video Widget (Google) YouTube is a video content display service managed by Google Inc. that allows this application to integrate such content into its own pages. Personal data collected: Cookies and Usage Data. Processing location: USA – Privacy Policy.

How can I control the installation of Cookies?

In addition to what is provided in this document, the User can manage preferences for Cookies directly from within their browser and prevent third parties from installing them. It is also possible to delete previously installed Cookies, including the Cookie that may have saved the User’s consent to the installation of Cookies from this site. It is important to note that disabling all Cookies may compromise the functionality of this site. The User can find information on how to manage Cookies in their browser at the following addresses: Google Chrome, Mozilla Firefox, Apple Safari, and Microsoft Windows Explorer.

For services provided by third parties, the User can also exercise their right to object to tracking by informing themselves through the third party’s privacy policy, using the opt-out link if provided, or by directly contacting the third party.

Notwithstanding the above, the Owner informs that the User can use Your Online Choices. Through this service, it is possible to manage tracking preferences for most advertising tools. Therefore, the Owner recommends that Users use this resource in addition to the information provided in this document.

Consent

By using the website and/or accepting the brief cookie notice, the user accepts the use of cookies on the website. (example extended cookie notice)

Data Controller's Extended Cookie Notice

The data controller is OpenCom issc – Piazza Giotto 13 – 52100 AREZZO AR (ict@opencom-italy.org). The data will be used, as described, only for technical purposes of the website and will never be sold to third parties. If consent to the use of cookies is not given, the website will still function correctly. In accordance with the provisions of Art. 13 of Legislative Decree 196/2003, the user is entitled, to the extent applicable, to the rights provided for in Art. 7 of the same decree.

Since the installation of cookies and other tracking systems operated by third parties through the services used within this website cannot be technically controlled by the Data Controller, any specific reference to cookies and tracking systems installed by third parties should be considered indicative. For complete information, please refer to the privacy policy of any third-party services listed in this document.

Given the objective complexity associated with identifying technologies based on cookies and their close integration with the operation of the web, the user is invited to contact the Data Controller if they wish to receive any further information regarding the use of cookies and any related uses thereof, such as by third parties, made through this website.

Definitions and legal references for extended cookie policy:

Personal Data (or Data)

Any information relating to a natural person, identified or identifiable, directly or indirectly, by reference to any other information, including a personal identification number. (cookie: example of extended cookie policy)

Usage Data

Information collected automatically through this Application (or third-party services employed by this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized 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 answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the visitor, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application, who must coincide with or be authorized by the Data Subject, and whose Personal Data is being processed. (cookie: example of extended cookie policy)

Data Subject

The natural or legal person to whom the Personal Data refers. (extended cookie policy)

Data Processor (or Processor)

The natural or legal person, public authority, agency or any other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

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 profile, in relation to the operation and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application.

Cookie

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

Email

Provides access to the User's primary email address. (extended cookie policy)

Legal references

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations under Art. 10 of EC Directive n. 95/46/CE, and under the provisions of Directive 2002/58/CE, as revised by Directive 2009/136/CE, on the subject of Cookies.