

## Data processing related to Communication - Marketing and Public Relations

(INFORMATIVE DOCUMENT pursuant to article 13 of Legislative Decree 196/2003 and articles 13 and 14 of the European Regulation n. 679)

Our philosophy is to approach our interlocutors always presenting them the information considered to be of their interest, avoiding invasive or oppressive actions that would go against our goal of creating a constructive and enjoyable contact and reference.

### 1. Types and Origins of data

The contact details used to activate the first contact and the information for evaluating your interest in our communications (on the basis of the institution of affiliation, activity, etc.) are, depending on the case:

- > retrieved from the persons concerned (following the contacts made with the persons concerned on the occasion of events) or from the persons authorized by them, like for example, the institution of affiliation
- > retrieved from public records, lists, acts or documents available for anyone, paying attention to select addresses that, on the basis of the activity carried out or the institution of affiliation or other published information, may reasonably have interest in the contents of our communications
- > retrieved from the lists purchased from authorized third parties legitimized to inform us of the data for these purposes.

### 2. Purposes and legal grounds of data processing

The purposes of data processing according to the present informative document are as follows:

- a. activation of the first contact in order to present us and to get a confirmation on behalf of recipients regarding their interest in communications in compliance with the obligations imposed by the legislation on the protection of personal data;
- b. communication and marketing. In particular, contact details, e-mail addresses and, where conferred by the person concerned, postal address and phone numbers, can be used for sending courtesy and/or informative materials, in some cases also of a commercial nature, relating to initiatives promoted/organized by the Movimento Life Beyond Tourism Travel To Dialogue srl Società Benefit, its services, also in relation to the organization of events mentioned in the following letter d;
- c. satisfaction of information requests from interested parties;
- d. sending invitations to attend conferences, debates, informative meetings and events promoted and organized by the Movimento Life Beyond Tourism Travel To Dialogue srl Società Benefit or to which it participates.

Personal data may be processed, always in relation to the purposes indicated above:

- > if it is necessary to satisfy any requests of the interested parties;
- > if it is necessary for the pursuit of a legitimate interest of the data holder, consisting in the activation of a contact with subjects potentially interested in its services (in particular for the purposes referred to in letter a) and in sending invitations to attend public or private events, in which it participates taking into account the reasonable interest of the recipient of the invitation;
- > if the data originate from public registers accessible to anyone and/or is made manifestly public by the interested party, in particular for the purposes indicated in the letters a-d;
- > having acquired the consent of the interested party, in particular for receiving communications of commercial nature.

### 3. Methods of data processing and storage

In relation to the aforementioned purposes, the processing of personal data may be carried out using paper, computerized and electronic instruments, always guaranteeing the utmost confidentiality.

The e-mail addresses and other contact details for which the interested party has granted a permission of use also for commercial purposes will be kept for 12 months following the last sending/contact with the subject or the revocation of consent; in this latter case, for those who do not have a contractual relationship with the Data Holder, in order to satisfy the request of the interested party and not to send undesired communications, even incidentally.

### 4. Managers in charge and agents

For the same purposes the data may be processed by the following categories of persons in charge:

- employees in the Communication - Marketing and Public Relations areas and employees responsible for the management of information systems;
- companies that manage our mail delivery services and other external suppliers, involved in the aforementioned activities (Art. 28 Reg. UE 2016/679)

### 5. To whom the data can be communicated

The personal data in question are not normally disclosed to third parties except for the persons specifically indicated by the given subject, or to other subjects who need access to data for the organization of events or surveys to which the interested party agrees to participate.

Obviously, all the communications described above are limited to the data necessary for the recipient to perform their duties and/or to achieve the goals related to the communication itself.

INTERNAL REGULATION FOR THE PROTECTION OF PERSONAL DATA	ATTACHMENT n.11.6 BIS Rev. 3 of 07/01/2022 PAG. 2 OF 2
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## 6. Provision of data and consent

Communication and updating of personal data, as well as consent to their processing, is obviously optional.

In case of the absence of consent, there will be no consequence except that the person concerned will not be involved in the initiatives in which Movimento Life Beyond Tourism Travel To Dialogue srl Società Benefit participates or promotes. It should be noted that any conferred consents also for further activities may be revoked at any time without prejudice to the lawfulness of the data processing carried out before the revocation.

## 7. Reference for data processing

The reference of data processing is to be made to the Movimento Life Beyond Tourism Travel To Dialogue srl Società Benefit, Via del Giglio, 10 - 50123 FLORENCE (FI) Tel.: +39 055 2382762 Fax: +39 055 283260.

## 8. Rights of the interested party

The interested party has the right:

- > to ask the data holder to access personal data and to rectify or cancel them (if they are no longer necessary, incomplete, erroneous or collected in violation of the law) or limit or refuse the processing of personal data,
- > if the processing is carried out by automated means (computerized) and to the extent that it is technically possible, to receive in a structured format or to transmit to him/her or to third parties indicated by him/her the information concerning him/her,
- > to withdraw its consent at any time (without prejudice to the lawfulness of the data processing based on the consent granted before the revocation), obviously in relation to the data processing conducted on the basis of this pre-condition
- > if the response to his/her requests is not satisfactory or if he/she deems it necessary, to formulate a complaint to the Authority for the Protection of Personal Data (<http://www.garanteprivacy.it/>)

To assert your rights, you can contact the Movimento Life Beyond Tourism Travel To Dialogue srl Società Benefit using the above-mentioned contact details or, more easily, sending a message to the following email address [privacy@lifebeyondtourism.org](mailto:privacy@lifebeyondtourism.org), bearing in mind that it will not be possible to respond to requests received by phone if there is no certainty about the identity of the applicant.