

INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA AND REMOTE COMMUNICATION TECHNIQUES

Information regarding privacy and remote communication techniques

The current legislation, defined in relation to EU Regulation 2016/679 dated 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) guarantees that the personal processing of data takes place in compliance with rights, fundamental freedoms as well as the dignity of the physical persons, with particular reference to confidentiality, personal identity and the right to personal data protection, ensuring that the data are processed in a lawful and fair manner.

In compliance with this legislative framework, we request you to provide your data to permit registration with the platform www.Volontaria-Mente.it, designed by the Allianz UMANA MENTE foundation with the purpose of putting people looking to volunteer and non-profit organisations into contact. By registering you can also manage your own page, view volunteering offers, contact organisations/individuals and use blog content.

For this purpose, our Foundation must acquire some data about the data subjects are specified in this document.

1. Data controller and contact information

The data controller is the Allianz UMANA MENTE Foundation, headquartered in Piazza Tre Torri, 3 – 20145 Milan, Tel.: 02.7216.2669, which defines the methods and purposes for processing your personal data.

This privacy policy therefore concerns the activities and data processing performed by the parties indicated in this document. This list is continuously updated and can be easily obtained free of charge by contacting: Allianz UMANA MENTE Foundation, headquartered in Milan in Piazza Tre Torri, 3 – telephone 02.7216.2669, where also the list of current data processors is available, as well as more detailed information about the parties who can become aware of the data as parties authorised to process personal data.

2. Categories of data collected

Our Foundation must acquire (or already has) some data about the data subjects. This data can also belong to special categories (such as data regarding health or membership in unions) only if necessary for carrying out and normally managing the project for which the data were collected.

We can process the following data categories:

- Personal data,
- Images collected by video registration or photography,
- Digital contacts, such as e-mail, mobile number, social network (Facebook, Twitter, etc.) and messaging/VoIP services (Skype, WhatsApp, Viber, Messenger, etc.)

If you load your own profile to the “VolontariaMente” website, also the following data may be processed:

- education;
- work experience;
- sensitive data (for example, data concerning your health) **which requires EXPLICIT CONSENT**, etc.;
- data regarding the organisation;
- residency.

3. Purpose of the processing

The data provided by the data subjects or other parties who perform operations that concern it or that, to satisfy their requirements, provide the Foundation with business, financial, professional information, etc., are used by our Foundation, by companies of the Allianz S.p.A. and Allianz SE Group and by third parties, to whom the data will be communicated to allow the Foundation – also on behalf of other companies in the Allianz S.p.A. and Allianz SE Group – to:

- put people looking for volunteering opportunities into contact with the non-profit organisations so they can start a dialogue and generative help can be provided;
- collect your personal data and your image by means of a photograph for the sole purpose of documenting and promoting the project and the activities of the Foundation. The data and images can be used for publication on the websites of the companies of the Allianz Group or other Group media also as content for interviews, videos and brochures for local and national press and television networks and on the communication channels of the Project partners, for example all social networks, internet sites, etc...

Hereby it remains understood that you will not be compensated in any manner in relation to the subject of any consent you sign and that herewith you permanently waive any and all claims for any reason towards the Allianz UMANA MENTE Foundation and any other party, natural or legal person, mentioned in the following document.

3.a Legal basis of the processing

The legal basis of data processing is that the processing is necessary to carry out the precontractual measures in view of creating, or following the creation of, an insurance relationship established upon request of the data subject.

Furthermore, for the sensitive data, the legal basis of the indicated processing is represented by the fact that the data subject expressed consent for the processing of their personal data.

3.b Optional and mandatory consent, right to refusal and consequences

The Allianz UMANA MENTE Foundation therefore requests you to express your consent – contained in the registration proposal – for the processing of your personal data as strictly necessary for the identification, design, definition and support of the service project.

Considering that the **consent** to processing your personal data is **optional**, please note that **if you refuse**, the Allianz UMANA MENTE Foundation will not be able to consider your participation in the initiative.

Whereas if you refuse consent for video registration/photographs this will not have any consequences and we will not collect any images that concern you.

4. Methods of using the data

Personal data are processed only using the methods and procedures strictly necessary for the described purposes, also through the use of paper mail, operator calls, fax, phone, mobile phone, e-mail, SMS, tablet, smartphone or other remote communication technologies, telematic, automated and IT instruments and social networks. We use the same methods also when we communicate some of these data for these purposes to other companies in our same sector, in Italy and abroad, and to other companies in our same Group, in Italy and abroad.

Data subjects have the right to know at any moment what personal data have been collected and how they are used.

5. Recipients of your personal data. Who can access your data

Without prejudice to what is indicated in section 1 of this privacy policy, please note that for some services we use trusted parties who perform technical and organisational tasks on our behalf and therefore their processing of the data is necessary for the achievement of the described purposes.

Also some of these parties operate outside of Italy.

These parties are our direct collaborators and perform the function of the “data processor” or are authorised to process the data, or work in complete autonomy as separate “data controllers”.

They concern, in particular, parties part of the Allianz S.p.A. and Allianz SE Group; IT and telematic service companies or data storage companies; postal service companies indicated on the postal envelope; consulting companies; other organisations operating in the social welfare sector.

In consideration of the complexity of the organisation and the close interrelationship between the various company functions, please note that, as data processors or parties responsible for processing, also our employees or collaborators concerned or involved with the respective duties in accordance with the instructions received may also become aware of the data.

In particular, in order to carry out the project, your data will also be communicated to:

ARVEA srl, Via Vitruvio, 42 – 20124 tax code 06964260969, as the data processor.

Data will also be communicated to third sector organisations who can collect the applications for volunteering as autonomous data controllers. The updated list can be found at the following link: www.volontaria-mente.it.

Please note that the personal data of the data subjects will not be disclosed further.

Data subjects have the right to know at any moment what data have been collected and how they are used.

6. Transfer of your data to a foreign country

Personal data of data subjects can be transferred to a European/non-European third country exclusively for the purposes specified in chapter 3 (Purpose of the processing), according to the methods indicated by the Binding Corporate Rules (BCRs) approved by the Allianz SE Group which can be viewed on the Corporate website. If these BCR are not applicable, we will implement all the security measures provided by the supervisory authority for the protection of personal data (standard clause for transfer of data to third countries) to ensure suitable protection for the transfer of personal data.

If you want to obtain a copy of the transferred data or for more information about the storage location, please contact: Fondazione Allianz UMANA MENTE, Piazza Tre Torri, 3 – Milan, Tel.: 02.7216.2669.

In any case, if your personal data are processed outside of the European Union or outside the European Economic Area, the Allianz UMANA MENTE Foundation guarantees that the recipient of the personal data ensures a suitable level of protection, in particular, through the adoption of certain standard contractual clauses that regulate the transfer of personal data and that have been approved by the European Commission.

UMANA MENTE Foundation will in no case transfer your personal data to subjects who are not authorised to process your personal data.

7. Your specific rights

Please note that every data subject has the right to write to the Data Controller to request access to their personal data and the right to rectification and erasure of the data or the limitation of their treatment or object to their processing and to exercise the right to data portability (for data processing performed after 25 May 2018). Furthermore, every data subject always has the right to lodge a complaint with the supervisory authority for the protection of personal data in the forms, methods and within the limits provided by current legislation. The data subject also has the right to revoke their explicit consent at any moment, if provided, without prejudice to the legitimacy of the processing based on the consent carried out prior to revocation. The specific list of your rights concerning the processing of your data is provided below.

The data subject may:

1. access their data, know the source, purposes and period of storage, the contact details of the data controller(s) and the persons to whom the data were communicated;
2. withdraw their consent at any moment;
3. update or correct their personal data at any moment;
4. request the erasure of their data from our systems (including the right to be forgotten, if the prerequisites apply) if the purpose of their processing is no longer necessary;
5. for processing carried out after 25 May 2018, reduce the scope of data processing (limitation) in certain circumstances: e.g. if the correctness of the processed data is disputed;
6. know of the existence of an automated decision-making process, including profiling, and meaningful information about the logic involved, as well as the importance and the envisaged consequences of such processing for the data subject;
7. obtain a copy of the personal data in electronic format and, for processing performed after 25 May 2018, request their portability;
8. know if the data have been transferred to a third country, information about the existence of suitable guarantees pursuant to the regulation of reference;
9. contact the DPO or the supervisory authority.

7.a) Right to erasure and to be forgotten, rectification and portability of data

Data subjects can request at any time to exercise their right to have their data updated, supplemented, rectified or erased or request their blocking and object to their processing as well as request their portability to another party.

The possible request of erasure will not affect the lawfulness of the processing of data that took place in the period during which consent was given.

To exercise your rights, contact:

Fondazione Allianz UMANA MENTE, Piazza Tre Torri, 3 – Milan, Tel.: 02.7216.2669.

8. Data storage period

Data will be stored for the period necessary for their use, that is as long as the purposes for which they are processed exist, according to the criteria resulting from compliance with current regulations and the correctness and balancing between the legitimate interest of the Data Controller and the rights and freedom of the data subject. As a result, if there are no specific regulations that envision different storage periods, the Data Controller will have the right to use the data for the above-stated purposes for a reasonable period of time with respect to the interest shown by the person to whom the data refer. The data will therefore be stored for the minimum period necessary in compliance with the information contained in the industry regulations and accounting for the need to access them to exercise a right and/or for the defence of legal claims. A suitable check is performed periodically to verify if the data subject to whom the data refers is still interested in having the data processed for the above specified purposes.

9. Right to lodge a complaint with a supervisory authority

The data party also has the right to lodge a complaint with the supervisory authority according to the methods indicated at www.garanteprivacy.it.