



GENERAL PRIVACY POLICY OF PANATHLON INTERNATIONAL

PRIVACY POLICY IN COMPLIANCE WITH ARTICLES 13 AND 14 OF EU REGULATION 2016/679

Articles 13 and 14 of EU Regulation 2016/679 lay down that the data subject must be informed of the basic features of the processing of his/her personal data. This Association complies fully with this obligation by informing you of the following:

CONTROLLER

The controller is PANATHLON INTERNATIONAL, VIA AURELIA PONENTE 1, 16035, RAPALLO (Italy)

PURPOSES OF THE PROCESSING

Data and photographs are collected for the following purposes:

- process your application for membership, also when filed electronically by forwarding an on-line application, in accordance with the Statute and the memorandum of association;
- fulfil all legal, regulatory or EU obligations;
- manage the members (administration of members, administration of contracts, orders, shipments and invoices, checking of reliability and solvency, management of action undertaken by the association etc.);
- manage any disputes (warning notices, settlements, debt collection, arbitration, judicial litigation etc.);
- carry out statistical surveys, send communication and promotional material about the activity of the association (mailing of the magazine, invitation to and participation in public events in traditional and computerized forms etc.);
- send newsletters to the users who have supplied their personal data;
- pursue the legitimate interest of the controller and of third parties;
- ensure data retention for historical and statistical purposes (in anonymous and aggregate form).

THE LEGAL BASIS FOR PERSONAL DATA PROCESSING is article 6, paragraph 1, letter (a, b, c) of the above-mentioned Regulation.

TYPES OF PERSONAL DATA PROCESSING

With regard to the above purposes, personal data processing is performed through paper-based, computerized, electronic or other telecommunication systems so as to guarantee the security and confidentiality of your personal data, as well as full compliance with the law. This policy applies to the data collected directly and indirectly from the data subject (articles 13 - 14) and drawn from directories, deeds or documents that are available to the general public, with the limitations and in the manners set forth in the regulations about their disclosure.

As for the special categories of personal data under article 9 (e.g., data that may reveal the data subject's trade union membership or his/her being member of associations or organisation similar to trade unions) which may become prejudicial for the rights and freedoms of the data subject, the personal data shall be processed within the limits set forth in the Regulation.

NATURE OF DATA PROVISION AND CONSEQUENCES OF YOUR REFUSAL TO ANSWER

The provision of personal data may be:

- mandatory in compliance with legal, regulatory or EU provisions; in such cases, your refusal to answer will prevent us from fulfilling our obligations as an association;

- affecting the possibility to fulfil effectively the obligations undertaken within the association; in such cases, your refusal will affect the quality and effectiveness of the task to be performed;
- optional for the purposes of carrying out statistical surveys, mailing communication and promotional material about the activity of the association, receiving the newsletter, magazine and institutional notices; in such cases, your refusal will prevent us from performing the above tasks.

COMMUNICATION AND DISCLOSURE

The above data:

- may only be disclosed to the following categories of data subjects:
 - Territorial structures (International, District – Area – Club) to pursue specific and legitimate purposes as laid down in the memorandum of association and in the statute;
 - e-mail marketing platform Mailup SPA (the platform controller's address is at Viale F. Restelli 1, 20124 Milan, Italy)
 - platform of the website ISAXIS srl (the platform controller's address is at Via Flaminia Prima 58, 60027 Osimo, Ancona, Italy)
- may only be disclosed to the employees and contractors who have been entrusted by us with such data processing, as well as to the entities that, serving as "processors", carry out technical and servicing tasks on our behalf.

DATA RETENTION

The period for which the personal data contained in the databases and regarding the following will be stored:

- **prospective members/members** (data of natural persons, some data regarding partnerships, data of legal persons concerning their employees and contractors or third parties related to them) in accordance with the statutory and marketing purposes of the association: retention period of 5 years;
- precontractual/contractual processing of personal data of prospective members/members, on the data subject's request, for the purpose of drafting a contract or a business offer: retention period of 5 years;
- legal requirements: retention period of 10 years;
- archiving in the public interest (scientific or historical research, statistical purposes): unlimited retention period.

RIGHTS OF THE DATA SUBJECT

PANATHLON INTERNATIONAL will make sure that you enjoy the rights laid down in the Regulation and summarized below.

You are entitled to:

- request from the controller access to, rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- withdraw your consent at any time, which withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal;
- lodge a complaint with a supervisory authority.

Date: 24 May 2018

The controller: PANATHLON INTERNATIONAL