

Fondazione ISMU

# **PROTOCOL FOR THE PROTECTION OF DATA**





# PROTOCOL FOR THE PROTECTION OF PERSONAL DATA

PREAMBLE:

This Protocol for the Protection of Personal Data (henceforth the “Protocol”) applies to ISMU Foundation, which operates from its registered offices at 1 Via N. Copernico, Milan.

Within this Protocol, the personal information collected is referred to as “personal data”.

The term “processing of personal data” will be used to refer to the collection, management, protection and storage of this data.

This Protocol also contains information on sharing personal data within the Foundation and with third parties (such as service providers).

ISMU adopts this Protocol, in line with its strict confidentiality and security policy, in order to protect the privacy of its internal/external users and process personal data fairly and transparently.

**Categories of personal data collected**

The personal data collected or obtained by the Foundation is either supplied directly (e.g. through a form on the website), or through communication with third parties (e.g. other associations or foundations to which ISMU turns in order to meet requirements associated with its own activities), or publicly available and accessible.

The Foundation may also gather or obtain personal data from other persons (e.g. partners, data processing co-managers or suppliers, who may be collecting data in the name of and on behalf of ISMU Foundation).

The personal data collected may include: name, surname, email address and, in some circumstances, other specific categories of personal data gathered either with the prior express consent of the individuals concerned, on a contractual basis, or in compliance with legal obligations.

**Nature and application of the data processed**

ISMU Foundation can use this personal data to provide information on news/meetings/events/updates and anything regarding the Foundation itself.

Any user who does not wish to receive information can click on the relevant function on the message, or send an email to [privacy@ismu.org](mailto:privacy@ismu.org). The user’s data will then be deleted immediately.

**Recipients of the personal data**

In connection with one or more of the abovementioned applications, ISMU can share data with

partners and/or \_\_\_\_\_.

ISMU may be obliged to divulge collected personal data when required to do so by law, by an administrative authority, or for the purposes of judicial proceedings.

### **Protection of personal data**

ISMU Foundation takes all the necessary precautions, including administrative, technical, organisational and physical measures, to protect the personal data of its internal and external users, in line with the Privacy Regulations of ISMU Foundation, referred to here in their entirety, in order to guard against the risk of the loss, theft, or fraudulent acquisition of said data, as well as any unauthorised accessing, sharing, alteration, or destruction of the same.

Despite applying all the security measures considered reasonably necessary once personal data has been collected, the transmission of this data over the Internet (including by email) is never entirely secure. For this reason, ISMU undertakes to protect the personal data in its possession.

### **Principles applicable to the processing of personal data**

ISMU Foundation is committed to making sure that the personal data in its possession are:

- Collected for specific, explicit and legitimate purposes, and that any further processing at a later stage is in line therewith;
- Processed in a way that is lawful, correct and transparent to the individual concerned;
- Appropriate, relevant and limited to the minimum information required by the purposes of the data (data minimisation);
- Accurate and, where necessary, updated;
- Stored in a form that prevents the individuals concerned from being identified beyond the timeframe required by the purposes for which the information is being processed;
- Processed in a way that ensures adequate security;
- Only transferred from one country to another in the presence of (i) a decision of adequacy adopted by the European Commission or (ii) appropriate protective measures.

### **Protecting the privacy of minors**

ISMU Foundation understands the importance of protecting the privacy of minors, particularly in a digital context.

It is the policy of ISMU never to knowingly collect or store information on any person below the age

of 16, except to perform essential services or conduct research and/or projects for which said information is expressly required.

### **Storage period**

ISMU systems store personal data for: (i) the time required by the related activities or operations; (ii) the storage term imposed by law; (iii) the applicable limitation period in the event of disputes or proceedings arising in the context of the activities, unless a deletion request is sent beforehand to [privacy@ismu.org](mailto:privacy@ismu.org). At the end of the period, the personal data will be destroyed in line with relevant legislation.

### **The rights of the individual**

In line with national and European legislation, all individuals have the right to expect the following from ISMU with regard to any personal data it may hold on them:

- To be made aware that their data is being processed, and informed of the purposes of said activity;
- To access their own personal data and request it be corrected or deleted, or that its processing be limited;
- Object to the processing of their personal data and call for its portability;
- Revoke any consent previously granted to ISMU Foundation at any time;

To exercise these rights, please contact the Foundation using this email address: [privacy@ismu.org](mailto:privacy@ismu.org).

This address may also be used for any privacy-related complaints.

### **The right to make a complaint**

Users who are unsatisfied with the way in which their personal data has been managed, or who have received an unsatisfactory response to an inquiry or request, have the right to make a complaint to the relevant Personal Data Protection Authority.

In this regard, users may contact ISMU to be redirected to the relevant Authority body, concerning any issues related to privacy or the processing of personal data, via this email address: [privacy@ismu.org](mailto:privacy@ismu.org).

### **Modifications to this Protocol for the Protection of Data**

This Protocol may be updated or changed (e.g. in response to new legislation or regulations).

The date on this page will be updated every time new versions of the Protocol for the Protection of Data are published and become applicable. Therefore, users are invited to refer to this document on a regular basis, so as to remain updated on the means by which their personal data is being protected.

Milan, 1.12.2018 (last updated)