

Project "MOM - Maternity Opportunities and Mainstreaming"

PRIVACY POLICY

pursuant to Article 13 of Regulation (EU) No. 679/2016

1. Who is the data controller?

The joint controllers of the data processing are the parties identified below and the lead partner of Project MOM **Associazione Piano C**, with registered office in Milan (MI), Via D'Orsenigo n. 18, Postcode 20135, Tax Code 97641830159 and VAT No. 09029700961, in the person of the *current* legal representative Ms Sofia Borri. Associazione Piano C acts as the owner of the personal data of the customer/user (hereinafter referred to as the "**data subject**") referred to in paragraph 2 below, and can be contacted at the e-mail address dillo@pianoc.it (hereinafter also "**Piano C**" or "**the Data Controller**"). By means of this document, the Data Controller informs the Data Subject that his/her personal data and special categories of personal data will be processed by Piano C jointly with the following legal persons, in a manner and for purposes decided jointly with them, pursuant to the joint controller agreement entered into between all the joint controllers on 13/12/2019 pursuant to and for the purposes of Art. 26 of Regulation EU/679/2016 (hereinafter, along with the Data Controller, also "**the "Partners"**" or "**the Joint Controllers**") and available upon explicit request by the Data Subject at the e-mail address indicated above:

- a) Ayuntamiento de Alzira, with registered office in calle Sant Roc n. 6 - 46600 - Alzira (Spain), in the person of its current legal representative Mr. Diego Gomez Garcia;
- b) EUROMASC - European Masters of Skilled Crafts, with registered office at PB 79, Nordstrand - 1112 - Oslo (Norway), in the person of its current legal representative Mr Rolf Aslaksrud Kristiansen;
- c) FPM - Fondazione Politecnico di Milano, with headquarters in Piazza Leonardo Da Vinci n. 32 - 20133 - Milan (MI), in the person of its current representative Mr Eugenio Gatti;
- d) Inova Consultancy Ltd., with registered office at 64 Ringstead Crescent S10 5SH, Sheffield United Kingdom, in the person of its current legal representative Ms Marina Larios; ➔
- e) International Platform for Citizen Participation with registered office at Trakia 96-E, fl.7, ap.34; 4023 Plovdiv, Bulgaria, in the person of its current legal representative Mrs. Stoyka Beleva;
- f) Life Based Value s.r.l. - with registered office in via Cadore n. 26 - 20135 - Milan (MI), in the person of its chairman and current representative Ms Riccarda Zezza;
- g) University of Thessaly- Special Account Funds for Research, with registered office at Argonafton & Filellinon - 38221 – Volos (Greece), Tax Code: 090071277, in the person of its current legal representative Ms Ioanna Laliotou;

2. What data are processed?

The Data Controller and the Joint Controllers, for the purpose of the proper performance of the activities and services offered through the project "*MOM - Maternity Opportunities and Mainstreaming*" (hereinafter also "**MOM Project**") process the personal data provided by the Data Subject during registration and participation, including name, surname, e-mail, password, nationality, number of children, level of education, work experience, duration of any period of unemployment, personal skills and difficulties, and qualification as "trainer or mum" (hereinafter jointly referred to as "**Data**"). The Data Controller and the Joint Data Controllers do not need to process the special categories of personal data of the Data Subject pursuant to and for the purposes of Articles 9 and 10 of Regulation EU/679/2016 and, therefore, such data shall not be disclosed: nevertheless, if, in the course of carrying out the activities and services offered through the MOM Project, the Data Subject communicates data belonging to the special categories provided for by Regulation EU/679/2016, such data shall be processed with the prior consent of the Data Subject and in compliance with the Terms and Conditions relating to the MOM Project (available on the website www.eu-mom.eu) and with the EU and national legislation in force; in any case, by disclosing such data and/or publishing contents containing such data on the MOM platform, the Data Subject gives its consent to the processing of such data and to their dissemination to all other users of the platform. The consent given may be revoked at any time by means of a specific request sent by the data subject to the e-mail address dillo@pianoc.it, without prejudice to the legitimacy of the processing carried out until the revocation of such consent.

3. For what purposes are the Data processed?

The data processing will be carried out for the following purposes:

- a) offer and correctly perform the services and activities related to the MOM Project, with particular regard to the purpose of "empowerment" of the professional skills of the data subject for a better employment placement, and for research and development;
- b) fulfil the pre-contractual, contractual and fiscal obligations arising from the relationship with the Data Subject;
- c) comply with the obligations laid down by the law, regulations, Community legislation or an order of the Authority (such as for combating money laundering);
- d) exercise the rights of the data controller and the joint data controllers, such as, for example, the right of defence in court.

The purposes referred to in points (a) to (d) are jointly referred to as the "**Contractual Purposes**".

- e) for the performance of activities related to any securitizations, assignments of credit and issuing of securities, transfers of business and branch of business, acquisitions, mergers, demergers or other transformations, and for the performance of such transactions;
- f) to carry out checks to prevent any fraud.

The purposes referred to in points (e) and (f) are jointly defined as the "**Legitimate Interest Purposes**".

- g) for the internal profiling of the data subject in order to improve the process of "dissemination" and promotion of the MOM Project in other realities and market sectors, as well as among public institutions. Profiling will be carried out exclusively internally by the Data Controller and the Joint Controllers, via procedures aimed at the pseudonymisation and anonymisation of the involved Data of the Data Subject.

The purposes referred to in point (g) are defined as the "**Marketing Purposes**".

4. On what basis are the Data processed?

The processing of data:

- is mandatory for the Contractual Purposes in so far as it is necessary for the performance of the MOM Project, in the cases referred to in points (a) to (c) of paragraph 3 above, and for fulfilling the legal obligations in the case referred to in point (d) of paragraph 3 above. The provision of data is mandatory in order to manage the relationship with the data subject and comply with legal obligations: if the data subject does not provide such data, the data controller and the joint controllers will not be able to activate his participation in the MOM Project and provide the related services and activities on offer;
- the processing for the Legitimate Interest Purposes referred to in paragraph 3, letters (e) and (f), is carried out for the pursuit of a legitimate interest of the Data Controller, or of the Joint Controllers, or of any counterparties participating in the economic transactions indicated in letter (e), within the limits provided for in Article 6(1)(f) of Regulation EU/2016/679. Processing for the Legitimate Interest Purposes is not mandatory and the Data Subject may object to such processing in the manner set out in paragraph 8 below, but if the Data Subject opposes such processing, his/her Data may not be used for the Legitimate Interest Purposes, unless the Data Controller and/or the Joint Controllers demonstrate the presence of overriding legitimate reasons, or reasons for the exercise or defence of a right pursuant to Article 21 of Regulation EU/679/2016;
- Finally, only by means of pseudonymisation and anonymisation procedures, and only within the facilities of the Data Controller and/or the Joint Controllers, the Data provided by the Data Subject may be used for the Marketing Purposes better specified in letter (g) of paragraph 3 above. If the Data Controller and/or the Joint Controllers do not use pseudonymisation and/or anonymisation procedures, the Data of the Data Subject for the aforementioned Marketing Purposes may only be processed with the prior consent of the Data Subject, which may be revoked at any time. If a data subject refuses to give his/her consent, he/she will not participate in the research aimed solely at the "dissemination" of the MOM Project. Failure to provide consent to the provision of data for Marketing Purposes does not affect in any way the contractual relationships established with the Data Controller and/or the Joint Controllers, nor the provision of services and activities offered by them. The Data Subject may revoke at any time any his consent given according to the procedures set out in paragraph 8 of this information notice.

5. How are the Data processed?

The processing of the Data Subject's Data is carried out by means of the operations indicated in Art. 4(2) of Regulation EU/679/2016, and more precisely: collection, recording, organisation, storage, consultation, processing, modification, extraction, use, disclosure in any form available, erasure and destruction of the data. The Data may be processed with manual or computerised tools, suitable to ensure their security, confidentiality and to prevent unauthorised accesses and breaches of the Data processed.

6. To whom are the Data disclosed?

The Data may be disclosed for the purposes of the Contract to persons who perform services connected and functional to the management of the contractual relationship in place or to be entered into and, in particular, to the following categories of persons located within the European Union and, within the limits set out in paragraph 7 below of this notice, outside the European Union:

- providers of assistance, tax and legal advice services, including debt collection companies;
- providers of IT or storing services, such as, among others, the company that issues and manages the digital signature certificate in the event that a digital signature is used by the data subject for signing the agreement.

The Data may be disclosed for the Legitimate Interest Purposes referred to in paragraph 3, letters (e) and (f), to suppliers of assistance services, technical, tax and legal advice, assignees of receivables in the context of securitization of receivables or assignment of receivables for purposes strictly related and instrumental to the management of the relationship with the transferred assignee, as well as the issuing of securities, persons who are transferees of a business or branch of business, potential purchasers of the Data Controller and/or the Data Controllers and companies resulting from any mergers, demergers, or other transformations of the Data Controller and/or the Joint Controllers, also within the scope of the activities functional to such operations, and to competent authorities.

Finally, the Data may be communicated for Marketing Purposes to service providers such as external data processors.

The aforementioned subjects may act, as the case may be, as external data processors or autonomous data controllers. The updated list of companies to which the Data Subject's Data will be disclosed may be requested at any time from the Data Controller and/or the Joint Controllers, by means of a specific request to be sent to the address referred to in paragraph 8 of this information notice. The Data will not be subject to dissemination except to the extent that they are published by the user on the MOM platform in such a way as to make them accessible to all other users.

7. Are the Data transferred abroad?

The Data may be freely transferred outside the national territory to countries located in the European Union. The data subject will have the right to obtain a copy of the data held abroad and to obtain information about the place where such data are stored, by expressly requesting it from the Data Controller and/or the Joint Controllers at the address in paragraph 8 of this information notice.

8. What are the rights of the data subject?

The data subject, in addition to the right to lodge a complaint before a supervisory authority, also has the rights listed below:

- Article 15 of Regulation (EU) No 679/2016 - **Right of access**: "The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data" and the information concerning the processing (paragraph 1); in addition, "Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer"(paragraph 2);
- Article 16 of Regulation (EU) No 679/2016 - **Right of rectification**: "The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement";
- Article 17 of Regulation (EU) No 679/2016 - **Right to erasure (right to be forgotten)**: under the terms laid down in Article 17, "the data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay";
- Article 18 of Regulation (EU) No 679/2016 - **Right to restriction of processing**: "The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
 - a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.;
- Article 20 of Regulation (EU) No 679/2016 - **Right to data portability**: "The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:
 - (a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
 - (b) the processing is carried out by automated means".

"In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible";
- Article 21 of Regulation (EU) No 679/2016 - **Right to object**: "The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions";
- Article 22 of Regulation (EU) No 679/2016 - **Right not to be subject to automated decision-making, including profiling**: "The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her".

The exercise of the above rights may be made by express request of the data subject, to be sent to the e-mail address dillo@pianoc.it or by other means communicated from time to time by the Data Controller and/or the Joint Controllers.

9. Who are the external data processors?

The complete list of processors is available by sending a written request to the address referred to in paragraph 8 of this notice.

10. How long will the processed data be stored for?

Data processed under the MOM Project:

- for the Contractual Purposes referred to in letters (a) to (d) and for the Legitimate Interest Purposes referred to in paragraph 3, letter (e), data will be stored for a period equal to the duration of the MOM Project and/or service and activities offered (including any renewals) and for the 10 years following its end, termination or withdrawal, except where storing them for a subsequent period is required for any disputes, requests by competent authorities, or under applicable law;
- for the Legitimate Interest Purposes referred to in paragraph 3, letter (f), data will be stored for the period strictly necessary to ensure the reliability of the checks indicated therein;
- for the Marketing Purposes referred to in paragraph 3, letter (g) of this information notice, data will be stored for a period equal to the duration of the Project and/or the service and activities offered (including any renewals) and for the 12 months following its end for any reason.

11. Changes and Updates.

This information is valid from the date indicated at the bottom of the page. The Data Controller and/or the Joint Controllers may also make changes and/or additions to this information, also as a consequence of any subsequent changes and/or additions to the current legislation on the subject matter. If substantial, the changes will be notified in advance and the data subject can view the text of the information notice constantly updated at the website www.eu-mom.eu or make an explicit request to the e-mail address indicated in paragraph 8 above.

Milan, 13.12.2019