

# Privacy notice for The Human Safety Net's Global Volunteering Challenge Peer to Peer campaign

## **1. The Human Safety Net Foundation processes your **personal data****

Fondazione Generali – The Human Safety Net ONLUS (hereinafter, also THSN Foundation), with registered office at Piazza Duca degli Abruzzi 2, 34132 in Trieste, Italy, processes your personal data as **Data Controller**.

If you wish to receive more information, you can use the following postal address: Fondazione Generali – The Human Safety Net ONLUS, Piazza Duca degli Abruzzi 2, 34132 Trieste, Italy.

For any questions or if you wish to exercise a right in respect of the processing of your personal data, you can contact the THSN Foundation:

- by email at: [contact@thehumansafetynet.org](mailto:contact@thehumansafetynet.org)
- by traditional mail at: Fondazione Generali – The Human Safety Net ONLUS, Piazza Duca degli Abruzzi, 2, 34132 Trieste Italy.

## **2. How we use your personal data and on the basis of which ground**

We process your personal data in the context of the Peer to Peer donation campaign with the purpose of performing all necessary activities for managing them, such as:

- (i) Creation and management of your account on the platform;
- (ii) Management of your campaigns;
- (iii) Tracking and reporting on your campaigns performance;
- (iv) Providing relevant news about THSN initiative and activities;

The processing of your personal data for the purposes indicated under points (i), (ii), (iii), (iv) is necessary to enable you to manage the Peer to Peer donation campaign and

to allow the THSN Foundation to comply with the contractual obligations as well as the legal requirements.

### **3. Why the provision of your personal data is required**

The registration to the Platform is free and on a voluntary basis. However, if you decide to register, for ensuring your involvement in the activities of THSN initiative and offering you the best user experience in the Platform, communication of your personal data is required.

### **4. Which personal data we use**

We process only the personal data strictly necessary to achieve the purposes above indicated. We mainly process the following data, either directly provided by you or provided by the THSN Foundation administrators:

■ Information requested upon registration:

- Name;
- Surname;
- Email address;

Third party personal data of participants to the Peer to Peer donation campaign are not processed in here.

### **5. How long do we store your personal data**

Your personal data can be retained for the duration of your relationship with us, in accordance with current legislation, unless specific regulations require a longer retention period.

### **6. With whom we share your personal data**

Our staff processes your personal data with modalities and procedures, also in electronic form, appropriate to ensure an adequate level of security.

In the context of the purposes set out above, we may transfer your personal data to third parties which have been assigned with the task to perform some activities concerning the management of your volunteering (see list of subcontractors below).

Subprocessors	Categories of Data	Why do we use them?
iRaiser	All Data	Platform editor
Amazon Web Services	All Data	For hosting and back-up purposes

They can be also transferred, where strictly necessary and for achieving the purposes above indicated, with other Generali Group companies.

Depending on the activity performed, such third parties may act as Data Processors, Joint Controllers or autonomous Data Controller (e.g. iRaiser acts as a data processor). Our staff and third parties which process your personal data for the purposes above indicated – exception for autonomous Data Controllers – receive proper instructions about the correct modalities of the processing.

By using the Platform, your personal data are viewable only to authorized Users, in compliance with their User profile. Your personal data are not disseminated.

## **7. Where we transfer your personal data**

As a general rule, we do not transfer your personal data in Countries outside the European Economic Area.

In exceptional cases, limitedly for the purposes indicated above, we may transfer your personal data to a third party above described or to a public body requesting it, also in Countries outside the European Economic Area.

In any case, the transfer of your personal data is performed in compliance with the applicable laws and international agreements in force, as well as on the basis of appropriate and suitable safeguards (such as, for example, transfer to a Country ensuring an adequate level of protection or adopting the standard contractual clauses approved by the EU Commission).

## **8. The rights you can exercise in respect of the processing of your personal data**

You can exercise the following rights in respect to your personal data:

- Access – you may request access to your personal data to receive information, for example, about the categories of personal data that THSN Foundation is currently processing;
- Rectify – you may ask THSN Foundation to correct personal data that is inaccurate or incomplete;
- Erase – you may ask THSN Foundation to erase personal data where one of the following grounds applies:
  - a. Where the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - b. You withdraw consent on which the processing is based and where there is no other legal ground for the processing;
  - c. You object to automated decision-making and there are no overriding legitimate grounds for the processing;

- d. The personal data have been unlawfully processed;
  - e. The personal data have to be erased for compliance with legal obligation in Union or Member State law to which THSN Foundation is subject;
  - f. The personal data have been collected in relation to the offer of information society services.
- **Restrict** – you may ask THSN Foundation to restrict how it processes your personal data, requesting only their storage, where one of the following applies;
- a. You contest the accuracy of your personal data, for a period enabling THSN Foundation to verify the accuracy of your personal data;
  - b. The processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
  - c. THSN Foundation no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims;
  - d. You have objected to processing pursuant to the right to object and automated decision-making, pending the verification whether the legitimate grounds for THSN Foundation override those of you.

- **Portability** – you may ask THSN Foundation to transfer the personal data you have provided us to another organization or / and ask to receive your personal data in a structured, commonly used and machine-readable format.

In case you provided your consent to the processing of personal data, you may withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

If your personal data are transferred outside the European Economic Area, you have the right to obtain copy of such data as well as indication of the Country/Countries where the data have been made available.

You can exercise your rights by contacting THSN Foundation at the contact details above indicated. The request of exercise of rights is free of charge, unless the request is manifestly unfounded or excessive.

## **9. Your right to object to the processing of your personal data**

You have the right to object to the processing of your personal data and request the stop of the processing operations when they are based on the legitimate interest (refer to How we use your personal data and on the basis of which ground).

## **10. Your right to lodge a complaint to the Supervisory Authority**

In case you consider that the processing of your personal data infringes the applicable privacy laws, you have the right to lodge a complaint to the Italian Personal Data

Protection Authority – Garante per la Protezione dei Dati Personali with the modalities indicated on the Authority’s website ([www.garanteprivacy.it](http://www.garanteprivacy.it))

### **11. How long we retain your personal data**

Your personal data can be retained as long as you are active on the or up to a maximum 24 months after inactivity.

### **Changes and updates of the privacy notice**

Also considering possible amendments of the applicable privacy laws, THSN Foundation may integrate and/or update, wholly or partially, this privacy notice. Any changes, integrations or updates will be updated through a new document.