

PRIVACY POLICY

(Article 13 of EU Regulation 679/2016)

In compliance with the provisions of Article 13 of EU Regulation 2016/679 (General Data Protection Regulation, hereinafter referred to as the "GDPR"), the following information is provided regarding the processing of personal data carried out in relation to the "Win a week in South Tyrol and discover a more mindful way to travel" competition.

1. Data Controller

IDM Südtirol-Alto Adige (VAT ID 02521490215), registered office: Piazza Parrocchia/Pfarrplatz 11 – 39100, Bolzano/Bozen. Email address: privacy@idm-suedtirol.com. (hereinafter referred to as the "Data Controller").

2. Data Protection Officer (DPO)

The Data Controller has appointed a Data Protection Officer who can be contacted at the following email address: data-protection-officer@idm-suedtirol.com, or by writing to the Data Protection Officer, Piazza Parrocchia/Pfarrplatz 11, 39100, Bolzano.

3. Data subject to processing

The following categories of data are processed by the Data Controller:

- general personal data referred to in Article 4, point 1 of EU Regulation 2016/679, namely:
- the participant's first and last names;
- their email address.

4. Purpose and legal basis of the processing

The personal data will be processed for the following purposes:

- a) Management of registration for and participation in the competition;
- b) Sending communications relating to the competition;
- c) Identification of winners and awarding of prizes;
- d) Compliance with legal obligations;
- e) Management of any requests for support, complaints or disputes relating to the competition;
- f) Newsletter subscriptions.

For the purposes referred to in points a), b), c), the legal basis for data processing is Article 6, point b) of the GDPR: the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. The provision of data is not mandatory, but it is a necessary requirement to perform the requested services. Failure to provide the data therefore makes it impossible to fulfil the requested services.

For the purpose referred to in point d), the personal data will be processed to comply with a legal obligation to which the Data Controller is subject, pursuant to Article 6, point c) of the GDPR.

For the purpose referred to in point e), the processing is necessary for the pursuit of the legitimate interest of the Data Controller, pursuant to Article 6, point f) of the GDPR.

For the purpose referred to in point f), with the prior consent of the Data Subject, personal data will be processed for subscription to the newsletter, from which the Data Subject may unsubscribe at any time using the relevant option.

The legal basis for the processing for the purpose referred to in point f) is Article 6, point a) of the GDPR: the Data Subject has given consent to the processing of their data for one or more specific purposes. The provision of data is optional, but it is a necessary requirement to pursue the indicated purposes.

5. Processing methods

The processing of personal data will be carried out with or without the aid of computer systems. The Data Controller undertakes to guarantee the logical and physical security and confidentiality of the personal data processed, implementing all the appropriate technical and organisational measures with regard to the processing.

6. Data retention

The personal data collected for the purposes indicated will be processed and stored for the time necessary to pursue the purposes for which it was collected, and, in any case, within the statutory limitation periods.

With regard to the processing of personal data for which the legal basis is consent, the personal data will be stored until the consent is revoked by the Data Subject.

7. Data recipients

The personal data is accessible to:

- employees and/or collaborators of the Data Controller in their capacity as persons authorised to process data;
- business partners and/or service providers who carry out outsourced activities on behalf of the Data Controller in their capacity as data processors; their activities may be related or instrumental to those of the Data Controller, or serve a supportive function. The list of data processors is available from the addresses referred to in point 1 of this policy;

The Data Controller may also communicate the User's data to third parties (Public Authorities, Police Forces or other public and private entities), exclusively for the purpose of fulfilling contractual or legal obligations, or those arising from EU law. In any case, the data will not be disclosed, nor will any data whose disclosure is prohibited by law be communicated.

8. Data transfers

There are no planned transfers of data outside the EU or to international organisations.

9. Rights of the Data Subject

In accordance with the provisions of Articles 15 to 21 of the GDPR, the User, as the Data Subject, may exercise the rights indicated therein, and in particular:

- The right of access (Article 15, GDPR). Obtain confirmation that personal data concerning them is being processed and, in this case, receive information relating, in particular, to: the purposes of the processing; the categories of personal data being processed and the retention periods; and the recipients to whom it may be communicated.
- The right to rectification (Article 16, GDPR). Obtain, without undue delay, the rectification of inaccurate personal data and the completion of incomplete personal data.
- The right to erasure (Article 17, GDPR). Obtain, without undue delay, the deletion of personal data, in the cases provided for by the GDPR.
- The right to restriction (Article 18, GDPR). Obtain the restriction of processing from the Data Controller in the cases provided for by the GDPR.
- The right to portability (Article 20, GDPR). Receive the personal data provided to the Data Controller in a structured, commonly used and machine-readable format, and obtain its transmission to another data controller without hindrance, in the cases provided for by the GDPR.

The right to object (Article 21, GDPR). Object to the processing of personal data concerning the Data Subject, unless there are legitimate reasons for the Data Controller to continue the processing.

The Data Subject can exercise the aforementioned rights and revoke the consent given by simply sending a request to the Data Controller or the DPO at the respective addresses indicated in point 1.

The User also has the right to lodge a complaint with the supervisory authority pursuant to Article 77 of the GDPR (https://www.garanteprivacy.it/web/garante-privacy-en/home_en).