

**PRIVACY POLICY**  
**Pursuant to Article 13 Regulation (EU) 2016/679**  
***“General Data Protection Regulation”***

Pursuant to Article 13 of the General Data Protection Regulation (the “**GDPR**”), Fondazione Penta ETS, an organization incorporated in Italy (Fiscal Code 92166930286) whose registered office is in Padova, Corso Stati Uniti, 4 (hereinafter “**Penta**”, “**we**”, “**our**”, “**us**” or the “**Foundation**”), in its capacity as Data Controller, provides you with the following information on the processing of your personal data in relation to the browsing on the website [www.thrive-ahdtraining.org](http://www.thrive-ahdtraining.org) (the “**Website**”). The Personal Data Processing will be carried out in compliance with the GDPR and the Italian Legislative Decree n. 196 of 30 June 2003 “Italian Personal data protection Code”.

Hereinafter, the term “**User**” or “**Users**” will be used to refer to individuals browsing the Website.

**a) DATA CONTROLLER**

Penta is the Data Controller of your personal data processed in relation to the browsing on the Website.

**b) DATA PROTECTION OFFICER (DPO)**

Penta appointed a Data Protection Officer (Article 37 of the GDPR) who may be contacted at the following e-mail address [dpo@pentafoundation.org](mailto:dpo@pentafoundation.org).

**c) PURPOSES AND LEGAL GROUNDS**

Penta processes personal data for the following purposes:

Purpose	Personal data processed	Description	Legal basis
<b>1) Use and improvement of the services offered by the Website</b>	Connection and usage data, such as: <ul style="list-style-type: none"> <li>- IP address;</li> <li>- device number/ID;</li> <li>- data relating to your internet connection and service provider;</li> <li>- the equipment you use to access the Website;</li> <li>- other technical and usage details.</li> </ul> With regard to browsing data collected on the Website through the use of cookies and other technical tools, please also refer to the <a href="#">Cookie details</a> .	Access to the main areas and features of the Website, and to enable normal and efficient navigation and use of the Website.	Performance of a service and compliance with legal obligations (Article 6, par. 1, let. b) and c), of the GDPR)
<b>2) Website registration and creation of a personal account</b>	<ul style="list-style-type: none"> <li>- Full name</li> <li>- Location</li> <li>- Contact information (e-mail, telephone number)</li> <li>- Professional data</li> </ul>	Enabling the User to carry out the following activities: <ul style="list-style-type: none"> <li>- registration on the Website;</li> <li>- creation of a personal account;</li> <li>- access to areas reserved for registered members.</li> </ul> In addition, Users’ email addresses may be used to send communications	Performance of a service at the User’s request (Article 6, par. 1, let. b), of the GDPR)

		regarding the use of the Website's features (e.g., confirmation of successful registration, reminders to renew credentials, etc.).	
<b>3) Contact us</b>	<ul style="list-style-type: none"> <li>- Full name</li> <li>- Contact information (e-mail)</li> <li>- Other information related to your question</li> </ul>	Properly handle the requests received and, where necessary, re-contact the User.	Performance of a service at the User's request (Article 6, par. 1, let. b), of the GDPR)

Through specific areas of the Website, the User may access additional processing activities, such as those related to spontaneous applications and the sending of newsletters. In these specific cases, the User will find a dedicated Privacy Notice near each individual registration form. The User is invited to carefully read the dedicated Privacy Notice before accessing or requesting the related services.

#### d) MEANS OF THE PROCESSING

Data will be processed and stored by computerized means, in compliance with the legislation in force and, in any case, in a way that ensures its safety, confidentiality and prevents unauthorized dissemination or use, falsification or destruction.

#### e) DATA RETENTION PERIOD

We retain data in line with what is indicated in the table below:

Purpose	Retention period
<b>1) Use and improvement of the services offered by the Website</b>	For information on the retention periods of personal data collected through cookies and other technical tools, please refer to the <a href="#">cookie details</a> .
<b>2) Website registration and creation of a personal account</b>	The duration of the User's registration on the Website.
<b>3) Contact us</b>	6 months from the User's last contact.

#### f) PROCESSING RECIPIENTS

Personal data will not be disseminated, unless you have provided us with specific consent.

Within Penta, personal data may come to knowledge (for their respective areas of competence) of the persons expressly authorized to the processing.

Personal data may come to knowledge of the following third parties: (i) companies that offer services instrumental to the management of the Foundation's technological infrastructure; (ii) companies and/or consultants that offer services instrumental to the browsing of the Website. Where necessary, Penta has appointed such processing recipients as Data processors pursuant to Article 28 of the GDPR. A list of all the Data processors designated by Penta can be requested by contacting Penta at the details below (par. h) of this privacy notice).

#### g) TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

Within the purposes listed above, your personal data might be the subject of transfer to countries not belonging to the European Union. The transfer of personal data will take place in full compliance with the guarantees, measures, and rights provided by the GDPR, usually based on adequacy decisions or standard contractual clauses approved by the European Commission. By sending an email to the contact listed below (par. h) of this privacy notice), you can receive further information regarding the transfer of your personal data and the guarantees in place for their protection.

#### h) DATA SUBJECT'S RIGHTS

By sending an e-mail to [legal@pentafoundation.org](mailto:legal@pentafoundation.org), you may at any time exercise the following rights provided for by Articles 15 to 22 of the GDPR:

- *obtaining confirmation as to whether your personal data is being processed;*
- *obtaining access to your personal data and to the information set out in Article 15 of the GDPR;*
- *obtaining the rectification of your inaccurate personal data without undue delay or the supplementing of your incomplete personal data;*
- *obtaining the erasure of your personal data without undue delay;*
- *obtaining the restriction of processing of your personal data;*
- *being informed of any rectifications or erasures or restrictions of processing in relation to your personal data;*
- *receiving in a structured, commonly used and machine-readable format your personal data;*
- *objecting at any time, on grounds associated with your specific situation, to the processing of your personal data.*

The full list of privacy rights could be found on [www.garanteprivacy.it](http://www.garanteprivacy.it).

**i) LINK TO OTHER WEBSITES**

This Privacy Policy applies solely to the Website and not to any other websites that the User may consult through links. Penta cannot be held responsible for personal data provided by Users to third parties or to any websites linked to the Website.

**j) REVISION CLAUSE**

Penta reserves the right to review, amend, or simply update this Privacy Policy, in whole or in part, at its sole discretion, in any manner and/or at any time, without prior notice, also in consideration of changes to laws or regulations on the protection of personal data. Amendments and updates to the Privacy Policy shall become effective as soon as they are published on the Website. Users are therefore kindly requested to regularly access the 'Privacy' section in order to verify the publication of the most recent and updated version of the Privacy Policy.

**k) COMPLAINT TO THE DATA PROTECTION AUTHORITY**

Should you consider that the processing of data infringes the GDPR, you have the right to raise complaint with the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)) or, if different, to the Data Protection Authority of the Member State of your habitual residence, place of work or place of the alleged infringement.

**Fondazione Penta ETS**

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