



A.S.D. GIRO DELLE DOLOMITI with registered office in Bolzano, Viale Trieste 17/D, VAT number 01649970215 (“**GDD**” or “**Holder**”) has always implemented measures to guarantee the privacy of its online users/registered. This document has been written, in compliance with art.13 of EU Regulation 2016/679 (“**GDPR**”) and of the D.lgs. 196/2003, modified by D.lgs. 101/2018 (collectively to GDPR, the “**Legislation Applicable**”) in order to inform you about our privacy policy, allow you to see how your personal data are handled when you use our website (<http://www.girodolomiti.com>), henceforth (“**Site**”), and, if necessary and/or appropriate, give your express, informed consent to your personal data being processed. The information and the data you provide or which are otherwise acquired through your use of the GDD’s services – for example, the request of information, the sending of the Health Certificate, the enrollment to one or more stages of the event, the purchase of products, the subscription of the insurance policy and/or the accessing at the areas of the Website (“ collectively the **Services**”), will be handled in compliance with the stipulations of the Legislation Applicable and of the confidentiality obligations that inspire the activity of the GDD.

In accordance of the Legislation Applicable, the treatments made by GDD will be inspired to the principles of lawfulness, fairness, transparency, limitation of the purpose and of the retention, data minimization, accuracy, integrity and confidentiality.

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1. Holder of the treatment

The holder entrusted with processing data through the Site is the GDD. For any information on how your personal data are being processed by the GDD, including a list of the appointed data processors from the Holder, you can write to the following address: girodol@girodolomiti.com.

2. The personal data processed

Following the access to the Website and of the use of the services to it connected or instrumentals, we inform you that the GDD will process the personal data which may comprise an identifying data such as the name, the surname, the birthday data, the fiscal code, the residence, the nationality, an identification number, an online username or one or more elements distinguishing your physical, physiological, mental, financial, cultural or social identity, to make the concerned subject identified or identifiable (“**Personal Data**”).



The Personal Data processed through the Website are as follows:

a. Web navigation data

The IT systems and software used to run the Website automatically acquire certain Personal Data, as the transmission of the same is implicit to the use of Internet communication protocols. This type of information is not gathered for the purpose of linking it to identified subjects, but, by its nature, if processed and linked to data held by third parties, could lead to the user being identified. This category comprises data such as IP addresses or the domain names of the computers used by the users connecting to the Website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to make the request of the server, the size of the file sent in response to the request, the numerical code indicating the state of the response made by the server (complete, error, etc.) and other parameters pertaining to the user's operating system and type of device being used. These data are used exclusively to obtain anonymous statistical information about Website use and to ensure the site is working properly, as well as making it possible to pinpoint any anomalies or improper use of the site; they are deleted immediately after processing. In the event of unlawful attacks against either the Website or related third parties, these data may be used to identify the guilty party/ies; excepting these cases, the data regarding web contact are deleted within a few days of creation.

b. Data provided voluntarily by the subject

The optional, explicit and voluntary sending of your Personal Data by means of contact and / or of the enrollment at the event on the Site or e-mail to the addresses indicated on the Site entails the subsequent acquisition of the data communicated to the sender, including the e-mail address, the mobile phone number, the membership of sports clubs, the insurance cover and the consent to receive any reply messages to own requests.

Personal data are used by the GDD for the sole purpose to finish the procedure of enrollment to the event, as well as to satisfy or reply to the requests transmitted and they are communicated to third parties only if this is necessary to this purpose.

When using some Website Services, Personal Data may be processed by third parties sent by you to the GDD. With respect to these assumptions, you are the independent data controller, assuming all the legal obligations and responsibilities. In this sense, it confers on the point the widest indemnity compared with any dispute, claim, request of compensation for damage from treatment, etc. that it should reach to the GDD from third parties which Personal Data have been processed through its use of the functions of the Site in violation of the rules on the protection of applicable personal data. In any case, if it provides or otherwise processes Personal Data of third parties in the use of the Site, it guarantees from now - assuming all related liability - that this particular hypothesis of treatment is based on an appropriate legal basis in accordance with the art. 6 of the GDPR which legitimizes the processing of the information in question.

3. Purpose of the treatment

The reasons for processing your data, with your express consent where necessary, are as follows:

- a. the purposes strictly connected and instrumental to allow the access and the use of the Site, of its functionality, the correct and timely Services delivery by GDD and/or third parties;
- b. to respond to requests for assistance or information;
- c. to comply with any legal, accounting or taxation obligations.
- d. when specifically requested, in order to execute the service of the newsletter.



4. Legal basis and compulsory or optional provision of the treatment

The legal basis for the processing of your Personal Data for the purposes stated in section 3 (a-b) is the art. 6 (1)(b) of the GDPR, inasmuch the treatments are necessary for the service delivering or for the response of the requests by the concerned. The contribution of the Personal Data for these purposes is optional, but failure to do so will make it impossible for us to provide our Services.

The purposes stated in section 3.c constitute legitimate processing of Personal Data under the terms of art. 6(1)(c) of the GDPR. Once you have given your Personal Data, the treatment is necessary in order to comply with a legal obligation with which the GDD is subject to.

The legal basis of the treatment for the sending of the newsletter is his own consent (art.6(1)(a) of the GDPR.)

5. Who may receive the Personal Data

For the purposes stated above, your Personal Data may be shared with:

a. subjects: (i) who normally act as data controllers, or in other words: persons, companies or firms of professionals which provide assistance and consultancy services regarding accounting, administration, legal, fiscal, financial and insurance relatively to the provision of the Services, as well as the selling of the photos done during the event;(ii) which typically act as external managers of the treatment which is necessarily to interact with in order to provide the Services (for example hosting providers, cloud services, timekeeping etc.); as well as (iii) subjects appointed to perform technical maintenance tasks (including maintenance of Internet connection apparatus and electronic communication network apparatus); (collectively, “**Recipients**”);

b. subjects, corporations or authorities to whom we must forward your Personal Data in compliance with the dispositions of the law or by orders of the authorities.

c. individuals authorized by the GDD to the treatment of the Personal Data necessary to perform activities strictly correlate to the provide of the Services, which have previously committed to maintain confidentiality or have a legal obligation to maintain confidentiality (for example employees of the GDD).

6. Movement of the personal data

Your Personal Data will not be shared with Recipients outside the European Economic Area.

7. Data retention

The Personal Data processed for the purposes stated in section 3 (a-b) will be stored only for the strictly necessary time in order to achieve the requested operations. In any case, the data processing concerns the provision of Services; the GDD will hold your Personal Data for the time permitted under Italian law to protect their own interests (art. 2946 c.c. e ss.).

The Personal Data processed for the purposes stated in section 3.c will be stored for the time permitted by the specific disposition or applicable law.

The Personal Data processed for the sending of the newsletter will be preserved until the revocation of his consents.

You can request further information on data retention and the criteria adopted to establish this time by writing to the following address: girodol@girodolomiti.com

8. Rights of data subjects

Under the terms of articles 15 and following of the GDPR, you have the right to ask to the GDD at any time, the access to your Personal Data, the adjustment or the cancellation of the same or to oppose their processing, you have the right to request restrictions to their processing in the cases foreseen by art. 18 of



the GDD, as well as to obtain the data pertaining to you in a structured, commonly recognized and legible form from an automatic device in the cases foreseen by art. 20 of the GDPR.

Requests of this kind should be made in writing to the following address: girodol@girodolomiti.com.

In any case, you always have the right to file a claim to the Competent Control Authority (Guarantee for the Protection of Personal Data) under the terms of art. 77 of the GDPR, in the event that you believe your Personal Data have been processed in violation of the applicable legislation.

9. Protection of the minors' privacy

The Site contacts a general public, however the Services connected to it or instrumental are intended for persons aged 18 or over. The GDD does not require, collect, use and disclose Personal Data provided by persons under the age of 18. If the GDD becomes aware of having collected data from a minor, it will immediately delete them.

10. Amendments

The GDD reserves the right to amend or simply update the contents of this privacy policy, either partially or entirely, for reasons which may include changes to the applicable legislation. You will be informed of any such changes through publication on the Website. Therefore, the GDD invites you to consult this section regularly in order to familiarize yourself with the most recent and up-to-date version of the privacy policy; this way you will always be adequately informed about the data gathered and how they are used.