

PRIVACY NOTICE

GROOMING PROJECT, with registered office in (70026) Modugno, via Contrada Madonna della Grotta 77 – Tax Code 93534000729, as Data Controller, wishes to inform you that it needs to process your personal data.

1. Purpose and legal basis of processing.

The personal data processed are those provided by you when filling out forms for participation in competitions, workshops and visits to events organized by us. This data will be processed for the following purposes:

- to enable the organization of events
- to enable you to receive up-to-date news on GROOMING PROJECT's activities and promotions, by sending you commercial and direct marketing communications and information about GROOMING PROJECT's services and offers or those of its partners, discounts and any other promotional and loyalty initiative adopted by GROOMING PROJECT, as well as to allow the sending of newsletters, through both traditional and fully automated contact systems; the legal basis for the processing is your express consent and compliance with a legal obligation to which the Data Controller is subject. Your personal data may be processed both through IT tools and paper-based media.

2. Retention period.

The Data Controller intends to retain personal data for a period not exceeding that necessary to achieve the purposes for which it is processed. With regard to the processing of your personal data for direct marketing purposes, GROOMING PROJECT has established that it will automatically delete your personal data, or transform it into an anonymous, permanent and irreversible form, within 24 months of the data being recorded. With regard to the processing of your personal data for profiled marketing purposes, GROOMING PROJECT has established that it will automatically delete your personal data, or transform it into an anonymous, permanent and irreversible form, within 12 months of the data being recorded. Regarding any other personal data, since it is not possible to precisely predetermine its retention period, the Data Controller undertakes from now on to base this specific processing on the principles of adequacy, relevance and data minimization, as required by Regulation (EU) 2016/679 of the European Parliament and of the Council (the "Regulation"), periodically verifying the need for its retention. Therefore, once the purposes for which it was processed have been achieved, the personal data will be removed from systems and records and/or appropriate measures will be taken to render it anonymous. This is without prejudice to cases where it becomes necessary to retain it in order to comply with legal obligations, or to establish, exercise or defend a right in court, or for historical or archival purposes.

3. Categories of recipients.

The data processed will not be disclosed to third parties. However, the following may become aware of the data, in relation to the processing purposes previously described:

- parties who may access the data by virtue of legal provisions;
- data controllers belonging to the GROOMING PROJECT group;
- parties who operate, within the borders of the European Union, in complete autonomy, as separate data controllers, or as data processors appointed for this purpose by GROOMING PROJECT, for purposes ancillary to the activities and services referred to in Paragraph 1, i.e. banking and insurance institutions, law and notary firms, insurance companies, debt collection agencies, service centers, companies or consultants appointed to provide further services to the Data Controller.

In addition, your personal data may also be accessed by Secretariat staff, National and Regional Bodies, and the Legal and Administrative/Accounting area of GROOMING PROJECT, provided they have been previously designated as persons acting under the authority of the Data Controller pursuant to art. 29 of the Regulation or as system administrators. Any disclosure of personal data will take place in compliance with legal provisions and

the technical and organizational measures put in place by the Data Controller to ensure an adequate level of security.

4. Transfer to Third Countries.

The Data Controller may transfer your personal data to Third Countries outside the European Union, including the United States of America, for the management of the services offered and of your sporting activity. Such transfer is always subject to adequate safeguards, as the Data Controller has ensured that the recipients are located in countries covered by an Adequacy Decision pursuant to art. 45 of the Regulation, or are part of the Privacy Shield, which protects the fundamental rights of every data subject whose personal data is transferred to the United States of America. For more information on the rules for transferring data to countries outside the European Union, please consult the website of the European Commission (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en) or the Privacy Shield website (<https://www.privacyshield.gov/welcome>).

5. Automated decision-making processes.

The Data Controller uses automated decision-making processes, including the profiling referred to in article 22, paragraphs 1 and 4, of the Regulation, without your consent. Should you consent to profiling, the data provided may be used to analyze or predict preferences, behavior and positions in order to personalize the content of informational and commercial communications and to offer only products and dedicated offers in line with your expressed preferences. Specifically, these processing activities involve the recording, analysis and profiling of your identification data, information relating to your professional activity, as well as data relating to your habits and consumption choices. The aggregation and analysis of the data collected allows the Data Controller to identify GROOMING PROJECT members with similar purchasing behavior. Thanks to the results of these analyses, you may receive commercial offers tailored to your needs.

In addition, as required by art. 22, paragraph 3, of the Regulation, the Data Controller implements all the most appropriate measures to protect your rights, freedoms and legitimate interests, including within the profiling process.

6. Nature of the disclosure.

Providing personal data for the purposes referred to in paragraph 1 is optional, but failure to authorize its processing will result in the impossibility of issuing the GROOMING PROJECT card. Providing personal data for the purposes referred to in paragraph 1 is optional, but failure to authorize its processing would prevent us from allowing you to fully benefit from the advantages offered through advertising, commercial and direct and/or profiled marketing information, from sending you the newsletter, and from informing you about additional services, events and promotions of GROOMING PROJECT and its partners.

7. Rights of the Data Subject.

In relation to the processing of personal data, you have the right to: request access to your personal data (art. 15), obtain rectification and integration (art. 16), obtain erasure of your personal data (art. 17), obtain restriction of the processing of your personal data (art. 18), receive the personal data concerning you in a structured, commonly used and machine-readable format, and to transmit such data to another data controller (art. 20), object at any time, for reasons connected to your particular situation, to the processing of your personal data carried out pursuant to art. 6, paragraph 1, letters e) or f) of the Regulation, not to be subject to a decision based solely on automated processing (art. 22). To exercise any of your rights, you may contact the Data Controller by sending a communication to the registered office or by sending an email to info@groomingproject.it.

You also have the right to lodge a complaint with a supervisory authority (art. 77) or to bring proceedings before the competent courts (art. 79), if you believe that the processing concerning you violates the Regulation. The complaint may be lodged in the Member State where you habitually reside, work, or in the place where the alleged infringement occurred.