

INFORMATION ON THE PROCESSING OF PERSONAL DATA
pursuant to Article 13 of Regulation (EU) 2016/679

RIALENET platform information for STUDENTS

Dear Student,

We are providing you with the following information pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter also referred to as "Regulation" or "GDPR"), to make you aware of the ways in which the data controller processes your personal data.

DATA CONTROLLER

The data controller is CRS4 S.r.l. (hereinafter also "CRS4"), in the person of its legal representative *pro tempore*, with registered office in Pula (CA), Loc. Piscina Manna, Building 1; telephone +39 070 92501; e-mail info@crs4.it; PEC: crs4@legalmail.it

DATA PROTECTION OFFICER

The data controller has appointed a Data Protection Officer ('DPO'), who can be contacted at: dpo@crs4.it

DATA CATEGORIES, PURPOSE, AND LEGAL BASIS FOR PROCESSING

Your personal data that will be processed are numerical user identification, first name and surname.

The personal data and any changes communicated by you are collected and processed for purposes related to the management of the RialeNet educational platform.

The legal basis is identified in the consent to the processing of personal data for one or more specific purposes pursuant to Article 6(1)(a) GDPR, in conjunction with Article 8 GDPR. In the case of data subjects under the age of 14, consent is given or authorised by the holder of parental responsibility.

COMPULSORY OR OPTIONAL NATURE OF PROVIDING PERSONAL DATA

The provision of data is compulsory for the fulfilment of the purposes. Any refusal to provide compulsory data will result in the impossibility of pursuing the processing purposes set out in this notice and, therefore, the impossibility of having access to the teaching platform.

PROCESSING METHODS AND RETENTION TIMES

Your personal data will be processed in accordance with the methods provided for by the regulations in force, in compliance with the principles of lawfulness, correctness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality. The processing may be carried out in paper form or by means of computerised and telematic tools, and the relevant data will be stored by the data controller.

All of the aforementioned data shall be retained for the time necessary to pursue the purpose set out in this information notice (duration of the contract and, subsequently, for the time the data controller is subject to retention obligations provided for, for tax or other purposes, by law or regulation). In the event of litigation, the data shall be retained for the duration of the litigation, until the time limit for appeals is exhausted. Once the retention periods have expired, the data will be destroyed or rendered anonymous.

RECIPIENTS OF DATA

Your personal data may be disclosed to the following categories of natural or legal persons, as persons involved in the processing, i.e., as persons whose knowledge of the data is required for the pursuit of the stated purposes, or as authorities to reasoned requests for which a response is required:

- natural and legal persons responsible for processing, pursuant to Article 28 GDPR
- the employees and collaborators of CRS4, expressly designated pursuant to Article 2-quaterdecies of Legislative Decree 196/2003 or authorised pursuant to Article 29 GDPR, who have been given specific instructions.

The data collected may also be communicated to administrative and judicial authorities, for inspection, supervision, or control functions or for the fulfilment of legal obligations.

Your personal data will not be disclosed except in anonymous form and, in any case, in such a way that you cannot be identified.

DATA TRANSFER ABROAD

Your personal data will not be transferred outside the European Economic Area. Should it be necessary to transfer your data to a third country or an international organization, such transfers will be carried out in accordance with Title V of the GDPR.

AUTOMATED DECISION-MAKING, INCLUDING PROFILING

Your personal data are not subject to any automated decision-making process, including profiling.

RIGHTS OF THE INTERESTED PARTIES

Your data subject rights are provided for in Articles 15 to 22 of the GDPR, including those of:

- Ask for confirmation of the existence or non-existence of your personal data.
- To have access at any time to the data concerning you (Art. 15).
- Obtain information about the purposes of the processing, the categories of personal data, the recipients, or categories of recipients to whom the personal data have been or will be disclosed and, where possible, the storage period.
- Obtain rectification or, where data are processed in breach of the law or are incomplete or incorrect, erasure or blocking of data (Art. 16) (Art. 17).
- Obtain the restriction of processing (Art. 18).
- Obtain portability of data, i.e. receive them from a data controller, in a structured, commonly used and machine-readable format, and transmit them to another data controller without hindrance (Art. 20).
- To object to the processing of one's

own data at any time for legitimate reasons (Art. 21). - Object to automated decision-making relating to natural persons, including profiling. - Ask the data controller to update, supplement, or restrict the processing concerning him/her (Art. 7). - Withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given before the withdrawal. - To lodge a complaint with a supervisory authority, namely in the Member State where he/she normally resides, works or where the alleged infringement has occurred. For Italy, this authority is the 'Garante per la protezione dei dati personali', established by Law no. 675 of 31 December 1996 (<http://www.garanteprivacy.it/>) (art. 77). The rights may be exercised at any time by writing to the data controller, at the postal address where he is based or at the e-mail address indicated above.

The model for the exercise of rights is available at the following link: <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/9038275>.

Pula, 22 March 2022