# Privacy

# Why this notice?

This page describes the methods of management of the Websites of **UniCredit Foundation**, with reference to the processing of the personal data of users who consult it. This is a disclosure made also under the terms of Art. 13 and 14 of Regulation EU 2016/679 to those who interact with the web services of UniCredit Foundation, accessible by electronic means via the addresses:

https://www.unicreditfoundation.org/ http://unicreditanduniversities.eu/

corresponding to the homepages of the UniCredit Foundation websites. The disclosure is made only for the UniCredit Foundation websites and not also for any other websites consulted by the user through links.

The disclosure is based also on Recommendation No 2/2001 which the European Personal Data Protection Authority, meeting as the Working Party established by Art. 29 of Directive 95/46/EC, adopted on 17 May 2001 to identify certain minimum requirements for the on-line gathering of personal data and, in particular, the methods, times and nature of the information that Data Controllers must provide to users when they visit web pages, irrespective of the purposes of the visit.

## The "Data Controller"

Following consultation of this website, data on identified or identifiable persons may be processed. The "data controller" is UniCredit Foundation, whose Registered Office is in Piazza Gae Aulenti, 3, Tower A – 20154 Milan.

In case of data processing running, within the various sections of the website will be pointed out the relevant Data Processors.

# Place of data processing

The processing of data connected with the web services of this site takes place at the above Headquarters in Milan and is performed only by the personnel of UniCredit Foundation, in charge of the processing, or by employees of UniCredit Services S.C.p.A., the "Data Processor" designated by the controller UniCredit Foundation. No personal data deriving from the web service is disseminated.

The personal data provided by users are used for the sole purpose of performing the service or task requested and are communicated to third parties only when necessary for this purpose.

## Types of data processed

#### Navigation data

During their normal operation, the information systems and software procedures used for the functions of this websites acquire certain personal data the transmission of which is implicit in the use of the Internet, which is based on the TCP/IP protocol.

This is information which is not gathered to be associated with identified data subjects, but which by its very nature could, through processing and association with data held by others, enable the users to be identified.

This category of data includes the "IP addresses" or domain names of the computers used by users who visit the website, the addresses in URI (Uniform Resource Identifier) format of the resources requested, the time of the request, the method used in submitting, the request to the web server, the dimensions of the file obtained in response, the numerical code indicating the state of the response given by the web server (success, error, etc...) and other parameters relating to the user's operating system and IT environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the websites and to check the correct operation of the UniCredit Foundation websites.

It should be noted that the above data could be used to ascertain responsibility in the case of computer crime which harms the UniCredit Foundation website or the structures of the data processor UniCredit Services S.C.p.A., or other websites connected or linked to it: except in this case, the navigation data are deleted immediately after the related statistical processing and in any case, they are kept for 24 months from the time of collection.

Data provided voluntarily by the user

Requests to send e-mail to the addresses indicated in the relevant section of the UniCredit Foundation website entail the subsequent acquisition of certain personal data of the applicant, including the applicant's e-mail address, necessary to respond to the requests.

Specific summary disclosures will be progressively contained or displayed on the pages of the website prepared for these particular services on request.

# Cookies

A cookie is a small "text file" that some websites, while they are being visited, may send to the address of the user who is visiting them in order to trace the manifested preferences and gather data in an exclusively anonymous form to improve the services and user-friendliness of the website itself. For these reasons, during navigation of its site, the UniCredit web server may also exchange cookies with the users' computers. All users may in any case, if they so choose, set their browsers in such a way as to receive a warning of the presence of a cookie and decide whether to accept it or refuse it. It is also possible to refuse the reception of cookies automatically activating the specific option in the browser: failure to use cookies, however, could entail difficulties in interaction with the Bank's website.

# Optionality of conferment of personal data

Apart from the details provided for navigation data, users are free to provide their personal data included in the specific electronic request forms, in the sections of the website prepared for the particular services on request.

It should be noted, however, that failure to provide such information may make it impossible to fulfil the request.

# Processing method and security measures

The personal data are processed with automated and non-automated instruments, only for the time strictly necessary to achieve the purposes for which they have been gathered. Specific security measures are observed to prevent loss of data, illegal or incorrect uses and unauthorized access.

In particular, in the sections of the website prepared for particular services, where personal data are requested from users navigating the site, the channel through which the data transit is encrypted by means of a security technology entitled Secure Sockets Layer & Transport Layer Security, abbreviated as SSL/TLS. The SSL/TLS technology makes available an encrypted channel in which information transits before it is exchanged via the Internet between the user's computer and the UniCredit Foundation central systems, making it incomprehensible to unauthorized persons and thus guaranteeing the confidentiality of the information transmitted.

The use of SSL/TLS requires however a compatible browser capable of "swapping" a security key with a minimum length of 128 bits, necessary to establish the said secure connection with the UniCredit Foundation central systems.

# Rights of data subjects

The data subjects to whom the personal data – which may be collected in the aforementioned specific sections – refer, have the right, pursuant to art. 15 and following of the above mentioned Regulation, to know at any time what personal data are held by UniCredit Foundation and how these data are used (Right of access), to obtain updating, correction or, if there is interest, integration, as well as cancellation, anonymization or limitation and may at any time revoke, where issued, consent to the processing of data: for purposes of sending commercial and advertising material, for direct sales or market research (i.e. direct marketing) and for profiling and marketing enrichment purposes.

Any such requests must be sent to: UniCredit Foundation Segreteria organizzativa:

Read and approved by

FABIO BLASUTTO

EGOR KOZLOV

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