

## 1. Meaning of the policy

The purpose of this Policy is to ensure that the subjects, referred to as “Data Subjects”, are provided with full and exhaustive information regarding the type of their personal data that will be subjected to collection, the modalities through which the related processing is carried out and the purpose for which it will be conducted. In particular, this Policy aims to meet the parameters of protection of personal data imposed by the GDPR (EU Reg. 679/2016), with reference to the general underlying approach that Directive 95/46/EC and then Declaration 2/2001 of Article 29 Working Party had imparted on the subject.

## 2. Data treatment holder and appointees

In accordance with Article 13 of GDPR we inform you that Junior Enterprise Torino Politecnico, based in C.so Duca degli Abruzzi, 24, 10129 Torino (TO), VAT n. 07012640012, will process, as the Data Holder, the personal data of individuals who give their free consent for the purposes outlined below.

The data referred to in paragraph 3 may, in addition, be processed by any Appointees, designated by the Data Holder. To this last category of subjects may belong, in any case, only those with the status of associates of J.E.To.P.

The Data Holder can be reached at the following email address: [presidente@jetop.com](mailto:presidente@jetop.com).

Subscribing to this policy, for and on behalf of J.E.To.P., is its legal representative Marco Loiacono, born in Torino, on 22/05/1999, C.F. LCNMRC99E22L219C.

## 3. Data subject to processing

The personal data requested and covered by this Policy are listed below:

- Name
- Surname
- Email address

If the Data Subjects are acting on behalf of a legal entity, it is also required the sharing of the entity's name.

## 4. Treatment modalities

In accordance with the principles set forth in the Terms, the Data Holder guarantees that the processing will be carried out in a fully transparent, lawful and correct manner.

The data may be processed with the help of computer, digital and manual tools of various nature, as long as they are suitable to guarantee security, confidentiality and to prevent unauthorized third parties from stealing, disseminating, modifying or having access to the data themselves. The Data Holder undertakes, to this end, to adopt adequate technical, physical and organizational security measures.

## 5. Purpose of the treatment

The collection and processing of personal data is for the purpose of enabling the Data Holder to contact Data Subjects for any clarifications regarding the services provided by J.E.To.P. or to draw up an estimate regarding the requested service or closely related activities.

## 6. Recipients of the communication of personal data

The recipients of the communication of the data referred to in paragraph 3 are only the Data Holder and any Appointees.

Data may also be provided to public offices and to the Public Administration for the fulfillment of specific legal obligations.

## 7. Data retention period

The data collected in compliance with the limits set forth in this policy, will be kept for the duration necessary to fulfill the purposes of paragraph 5 and, in any case, for a period not exceeding 4 (four) months starting from the date of provision of data and consent to this privacy policy.

## 8. Rights of Data Subjects

The Data Subject, in accordance with Articles 15 et seq. of the GDPR, has the right to request from J.E.To.P., at any time, access to the personal data concerning him/her, the restriction of processing, and the rectification or erasure of the same.

The Data Subject has the right to revoke his or her consent at any time pursuant to Article 7 of the GDPR. Revocation of consent does not affect the lawfulness of the processing based on the consent before revocation.

The Data Subject has the right, pursuant to Article 15 GDPR, to obtain confirmation from the Data Controller as to whether or not any processing involving his or her personal data is taking place. If so, the Data Subject has the right to request specific information such as, for example, the purposes of the processing and the categories of data processed, the third parties to whom such data have been or will be communicated, and the period of data retention.

The Data Subject has the right to rectify erroneous personal data and also to supplement incomplete data, pursuant to Article 16 GDPR.

The Data Subject has the right to obtain, pursuant to Article 17 GDPR, the right to the deletion of personal data processed by the Data Holder. This will only be possible in the presence of a specific objectively appreciable reason, such as, for example: the uselessness of the processed data in relation to the purposes for which they were collected, the unlawfulness of the processing, the need for deletion for the fulfillment of a legal obligation.

In addition, the Data Subject has the right to request the restriction of processing in the cases provided for in Article 18 GDPR, i.e. in case of inaccuracy of the processed data, in case of unlawfulness of processing, in case of necessity of the data for procedural purposes, in case of pending opposition to processing.

In case of personal data breaches, resulting from theft of the archives, cyber attacks, fortuitous cases, etc., which may generate a high risk to the rights and freedoms of the data subject, such as indiscriminate dissemination of data to third parties, the Data Holder will notify the Data Subject without undue delay, based on the provisions of Article 34 GDPR.

In any case, the Data Subject has the right to lodge a complaint with the Data Protection Authority, pursuant to Article 77 GDPR.

Requests by the Data Subject and addressed to the Data Holder should be made in writing to the e-mail address indicated in paragraph 2 of this Policy. The Data Holder will comply with the Data Subject's requests without delay.

## **9. Compulsoriness of treatment**

The provision of the data in question is considered mandatory in order to fulfill the purposes referred to in paragraph 5. Therefore, their non-disclosure or lack of consent to their processing by the Data Subject precludes the possibility of getting in touch with J.E.To.P. In these hypotheses any data that may have reached the Data Holder will be deleted without delay.

## **10. Changes of the policy**

The Data Controller reserves the right to modify or simply update the content, in part or in full, due to changes in applicable legislation. In such an eventuality, the Data Subject shall be promptly informed of the changes introduced through the collected contact information.