**Privacy Policy - Furhy**

| **What is this document?** Pursuant to art. 13 European Reg. n. 679/2016 (“**General Data Protection Regulation**” or “**GDPR**”) and in compliance with the principles contained therein, CETMA intends to inform each user (the “**User**”) about the processing of personal data collected in the context of the participation in the project. |
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1. **Data Controller and Contact Details**

CENTRO DI RICERCHE EUROPEO DI TECNOLOGIE DESIGN E MATERIALI (CETMA), PIC 999500223, Strada Statale 7 Appia KM 706+030 SNC, Cittadella della ricerca Brindisi 72100, Italy. Contact detail: [dpo@cetma.it](mailto:dpo@cetma.it) (hereinafter referred as " **Controller**").

1. **Purposes of processing, Legal Basis, Personal Data and Retention period**

The Controller processes Personal Data for the following purposes, as specified here in below. The table also shows the legal basis which justifies the processing and the period of data retention:

| **Finalità** | **Dati Personali** | **Base giuridica** | **Periodo di conservazione** |
| --- | --- | --- | --- |
| Contact and support (including through the use of instant messaging services) | ✓ Anagraphic information (Name, surname)  ✓ Contact details (email, phone number, city) | Performance of a contract or pre contractual measures [Art. 6, 1, lett. b)] | For the time necessary for the response. |
| Registration on the Website and account management | ✓ Anagraphic information (Name, surname)  ✓ Contact details (email, phone number, address) | Performance of a contract [Art. 6, 1, lett. b)] | Until account deletion. |
| Sending communications concerning similar services and projects in which the company has participated (so-called soft spam) | ✓ Anagraphic information (Name and surname)  ✓ Contact details (email)  ✓Demographic data (age, gender, education level, income, occupation, marital status, place of residence) | Legitimate interest  [Art. 6, 1, lett. f) GDPR] | Until the withdrawal of consent and no longer than 24 months from the date of the last contact. |
| Allow the Controller to accomplish all formalities required by law. | ✓ Anagraphic information (Name, surname)  ✓ Contact details (email, phone number, address) | Legal obligation [Art. 6, 1, lett. c) GDPR] | Until the expiry of the data retention period, as provided by the applicable law. |
| Improve the Website by analyzing how Users navigate and/or use the Website. | ✓ IP address | Legitimate interest  [Art. 6, 1, lett. f) GDPR] | Not applicable (aggregate or anonymous data) |
| Detecting or preventing fraudulent activity and exercising the Controller's rights in Court | ✓ Anagraphic information (Name, surname)  ✓ Contact details (email, phone number, address) | Legitimate interest  [Art. 6, 1, lett. f) GDPR] | 10 years |

**3. Processing modalities**

The processing of personal data will take place through automated and/or manual tools in order to ensure proper security measures to prevent access, disclosure, loss, incorrect, illegal or unauthorized use of data.

**4. Data sharing**

Your Personal Data may be shared with the following external subjects: (i) Internet service providers, software companies and platforms used by the Controller as communication channel; ii) consultants and other third-party service providers who perform services for us or on our behalf and require access to such information to do that job; iii) authorities, government agencies, or judicial courts to meet any applicable law, regulation, legal process, or enforceable governmental request.

These subjects act as autonomous Data Controllers or Data Processors. In the latter case, the Controller has signed a contract pursuant to Art. 28 GDPR (Data Protection Agreement or “DPA”).

The list of data processors is available by sending a request to the Data Controller at [dpo@cetma.it](mailto:dpo@cetma.it).

Personal Data will also be processed by the Controller's internal staff specifically authorized pursuant to Article 29 of the GDPR.

**5. Data Processing Locations**

Personal data are processed and stored at the headquarters of the Controller, as well as in the servers that host the Website and the booking engine software established in EU. Transfers of Personal Data outside the EEA shall be carried out only with appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission or other safeguards provided for in the GDPR.

**6. Data subject’s rights**

The User may exercise all the rights provided for by Articles 15-21 of GDPR, at any time and without unjustified limitations, by contacting the Data Controller at dpo@cetma.it. Requests shall be filed free of charge and processed by the Controller within 30 days.

Specifically, the User can:

* obtain from the Controller confirmation as to whether or not Personal Data are being processed (Art.15);
* obtain from the Controller the rectification of inaccurate Personal Data or the completion of inaccurate ones (Art. 16);
* obtain from the Controller the erasure of Personal Data (Art. 17);
* obtain from the Controller restriction of processing (Art. 18);
* have the right to receive his/hers Personal Data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (Art. 20);
* have the right to object (Art. 21);
* with regard to the purposes of processing based on consent, withdraw that consent at any time.

**7. Complaints**

In any case, Users are always entitled to lodge a complaint with the competent supervisory authority (Autorità Garante per la Protezione dei Dati Personali), under Art. 77 of the Regulation, if they believe that the Data Controller’s processing of their Personal Data is in violation of the applicable law.

**8. Amendments**

The Controller reserves the right to amend and update that Privacy Policy as a result of any further new or revised provisions of any national and EU laws and regulations on personal data protection.