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**PRIVACY NOTICE of STILL I RISE APS  
FOR PARTICIPANTS IN PROJECTS/COURSES/EVENTS  
Pursuant to Articles 13 and 14 of EU REGULATION No. 2016/679 (GDPR)**

This notice is provided in accordance with the legislation on the protection of individuals with regard to the processing of personal data as set out in EU Regulation 2016/679 (GDPR) "General Data Protection Regulation" and aims to inform you about the processing of the personal data you have provided and that has been acquired by Still I Rise APS.

**Il Titolare del Trattamento è Still I Rise APS, (P.I. 91015070633), con sede legale in Via Adelaide Ristori, n. 44 - 00197 ROMA.**

**1. DEFINITIONS.**

Processing: Refers to any operation or set of operations performed on personal data, whether by automated means or not, such as the collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination, or any other form of making available, comparison or interconnection, restriction, erasure, or destruction.

Personal Data: Any information relating to an identified or identifiable natural person ("Data Subject"); a person is considered identifiable if they can be identified, directly or indirectly, particularly with reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to their physical, physiological, genetic, mental, economic, cultural, or social identity.

Data Controller: The entity that determines the purposes and means of processing the personal data of the Data Subject.

Data Processor: A natural or legal person, public authority, service, or other body that processes data on behalf of the Data Controller.

Data subject: Individuals involved in the participation in one or more projects, courses, or events organized by Still I Rise.

**2. PURPOSES, LEGAL BASIS, AND RETENTION PERIODS.**

Personal data will be processed for the following purposes, together with the relevant legal bases. The data retention periods indicated are understood to be in addition to the time necessary for the prescription periods related to mutual rights and the time for backup retention.

► To manage the organization and delivery of the course/event, including the transmission of communications or useful materials, a lawful purpose based on the necessity to perform a contract or pre-contractual measures pursuant to Article 6(1)(b) of the GDPR. In this case, the data will be retained by the Data Controller for 10 years from the year the course or event takes place.

► Detection of the level of satisfaction and support activities, lawful purposes based on the necessity to perform a contract or pre-contractual measures pursuant to Article 6(1)(b) of the GDPR. In this case, the data will be retained by the Data Controller for 10 years from the year in which the effects of the last contract cease.

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**STILL I RISE A.P.S.**

Registered Office: Piazza Giuseppe Mazzini, 8 - 00195

Rome (RM) | Tax Code 91015070633, VAT No. 18055391009

[www.stillirise.org](http://www.stillirise.org) | [legal@stillirisengo.org](mailto:legal@stillirisengo.org) | [compliance@stillirisengo.org](mailto:compliance@stillirisengo.org)

- To collect multimedia content for review and feedback activities, a lawful purpose based on the necessity to perform a contract or pre-contractual measures pursuant to Article 6(1)(b) of the GDPR. In this case, the data will be retained by the Data Controller for the period established in relation to the management of the project/course/event during which the data was collected.
- To collect and manage multimedia content documenting the activities of Still I Rise for the association's documentation and archival purposes, a lawful purpose based on the Data Controller's legitimate interest in documenting its activities pursuant to Article 6(1)(f) of the GDPR. In this case, the data will be retained by the Data Controller until the conclusion of the reporting activities or, in any case, until the archive in which they are stored is discontinued.
- To process multimedia content for the promotion of Still I Rise's activities across all areas (exhibitions, contests, screenings, internet, advertising, publishing, print, including online or social media dissemination), a lawful purpose based on the data subject's consent pursuant to Article 6(1)(a) of the GDPR. In this case, the data will be retained by the Data Controller for no longer than two (2) years from the year of collection. In the absence of explicit consent, multimedia content that does not make individuals identifiable (e.g., a photo of a project created during participation in a program) may still be processed for this purpose.
- To carry out informational and promotional activities related to initiatives, projects, events, and awareness or fundraising campaigns promoted by Still I Rise, similar to those in which the data subject has shown interest or participated, a lawful purpose based on the Data Controller's legitimate interest in promoting its activities and raising awareness of its mission pursuant to Article 6(1)(f) of the GDPR and Article 130, paragraph 4 of the Italian Privacy Code. In this case, the data will be retained by the Data Controller for 2 years from the year of the last interaction.
- To carry out informational and promotional activities related to initiatives, projects, events, and awareness or fundraising campaigns promoted by Still I Rise, as well as to conduct analyses and surveys, including those of social interest, based on the data subject's prior consent pursuant to Article 6(1)(a) of the GDPR and Articles 130(1) and 130(2) of the Italian Privacy Code. In this case, the data will be retained by the Data Controller for up to 2 years from the year of the last interaction.

In addition to the above, as part of the activities necessary for the proper management of the organization, your personal data will also be processed by authorized internal or external personnel for:

1. Management and maintenance of the network and IT systems, when processing is done through automated means, even partially (for example, when data pass through Still I Rise's IT systems), based on the legitimate interest in protecting these systems and for the obligations related to information security. Data will be retained in accordance with security implementations and the provisions for the main processing activities described above.
2. Managing compliance and governance activities, as required by law or based on the legitimate interest of the Data Controller to pursue control and efficiency within the Organization, in accordance with the retention periods established for the main processing activities or according to applicable regulations.
3. Preventing and detecting abuse and defending the rights and interests of the Data Controller, by retaining the data until the expiration of the prescription periods, unless litigation is involved (in which

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case, data will be retained until the dispute is definitively resolved), based on the legitimate interest of the Data Controller in protecting its rights and interests.

### **3. TYPES OF DATA PROCESSED.**

The Data Controller primarily processes the following categories of personal data (hereinafter referred to as the "Data"): Personal identification data, Contact data, Address data, Data related to identification codes, Multimedia content (photos, videos, educational materials, or other intellectual works), Data relating to other existing and/or past relationships with SIR, Data concerning purchases or use of services, Access and identification data, and Other data voluntarily provided.

### **4. SOURCES OF DATA COLLECTION.**

The data are collected by the Data Controller either directly from the participants or from third parties who have registered or communicated the participation of multiple individuals or who manage booking services. In some cases, participants may provide data concerning other individuals, in compliance with the applicable data protection regulations.

### **5. PROVISION OF DATA.**

The data whose provision is required by law or contract is indicated during the collection process (e.g., marked with an asterisk). Failure to provide such data may result in legal or contractual consequences. Failure to provide optional data does not have consequences, except for the inability to proceed with the processing for which the data is required.

### **6. TRANSFER OF DATA OUTSIDE THE EU.**

The servers on which the above-mentioned data is stored are located in Italy and within the European Union. However, it is understood that the Data Controller, if necessary, has the right to move the location of the archives and servers to Italy and/or within the European Union and/or to countries outside the European Economic Area. In such cases, the Data Controller ensures that the aforementioned extra-EU transfer will take place in accordance with applicable legal provisions, by entering into agreements, if necessary, that ensure an adequate level of protection and/or by adopting the standard contractual clauses provided by the European Commission.

### **7. RECIPIENTS OF THE DATA.**

The personal data processed will be communicated, where necessary and/or functional to the management of the established relationship and in order to pursue the purposes described above, to the following subjects:

- a) Persons authorized to process personal data by the Data Controller and regularly appointed in accordance with Article 29 of the GDPR (e.g., employees and collaborators of the organization);
- b) The manager of our software system, printers, email and SMS platform managers, and other persons duly appointed as data processors in accordance with Article 28 of the GDPR;
- c) Other subjects to whom it is necessary to communicate the data due to legal obligations, including, for example but not limited to, public authorities.

### **8. RIGHTS OF THE DATA SUBJECTS.**

The individuals to whom the aforementioned personal data refer (so-called "data subjects") have the right to exercise their rights according to the methods and within the limits provided by the applicable privacy laws. In relation to the processing of their personal data, the data subject has the right to request from Still I Rise APS:

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- Access: To confirm whether or not personal data concerning them are being processed, and to obtain further clarification regarding the information in this Privacy Policy, as well as to receive the data itself, within reasonable limits based on the common sense of a reasonably diligent person;
- Rectification: To rectify or complete the data they have provided or that is otherwise in the possession of the Data Controller, where such data is inaccurate;
- Erasure: To request the deletion of their data, which have been acquired or processed by Still I Rise APS, when they are no longer necessary for the purposes of the association or if there are no ongoing disputes or controversies; further, in case of withdrawal of consent, opposition to processing, unlawful processing, or if there is a legal obligation to delete the data;
- Restriction: To request the limitation of processing of their personal data, in accordance with Article 18 of the GDPR; in this case, the data will not be processed, except for storage purposes, without the data subject's consent, except as stated in the same article, paragraph 2;
- Objection: To object at any time to the processing of their data based on a legitimate interest of the association, unless there are legitimate reasons for Still I Rise APS to proceed with processing that override the data subject's interests, such as the exercise or defense of the association's rights in court; the objection of the data subject will always take precedence over the legitimate interest of the APS in processing the data for promotional purposes;
- Data Portability: To request to receive their data or have it transmitted to another controller specified by the data subject, in a structured, commonly used, and machine-readable format.

Finally, pursuant to Article 7, paragraph 3, GDPR, the data subject may withdraw their consent at any time, without affecting the lawfulness of the processing based on the consent given prior to the withdrawal.

The data subject also has the right to lodge a complaint with the Supervisory Authority, which in Italy is the Garante per la Protezione dei Dati Personali, located at Piazza Venezia 11, 00187 – Rome – <https://www.garanteprivacy.it/>.

#### **9. EXERCISE OF RIGHTS.**

For the exercise of the rights referred to in the previous point 8, or to report any issues or request clarifications regarding the processing of personal data, the Data Subject can send their request by mail to the Data Controller Still I Rise APS with registered office at Piazza Giuseppe Mazzini no. 8 - 00195 Rome (RM), Italy, specifying the subject of the request, or by email to the following address: [compliance@stillirisengo.org](mailto:compliance@stillirisengo.org).

The response time to the Data Subject is one (1) month, extendable by two (2) months in cases of particular complexity; in such cases, the Data Controller will provide at least an interim communication to the Data Subject within one (1) month. The exercise of rights is, in principle, free of charge; however, the Data Controller reserves the right to request a fee for manifestly unfounded or excessive (including repetitive) requests, in accordance with the guidelines provided by the Data Protection Authority.

#### **10. CHANGES TO THE PRIVACY NOTICE.**

Changes to the personal data processing described above or the entry into force of new national and international legal and regulatory provisions, including specific legislation concerning third-sector entities, may require modifications to the methods and terms described in this Privacy Notice. Therefore, this document may be updated over time to ensure it remains accurate.

Any changes will be reflected in the updated date at the bottom of the document. We recommend regularly reviewing the privacy notice, and you can also request a copy from the Data Controller.

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**Rome, 18/06/2025**

**Still I Rise APS**

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