PRIVACY NOTICE of STILL I RISE APS
PROMOTIONAL ACTIVITIES
Pursuant to Article 13 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.

The Data Controller is Still I Rise APS, Tax Code 91015070633, VAT No. 18055391009, with registered office at Piazza Giuseppe Mazzini no. 8 - 00195 Rome (RM), Italy.

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 targeted by initiatives aimed at promoting the activities of 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.

➢ Carry out informational and promotional activities related to the initiatives, projects, events, and awareness and fundraising campaigns promoted by Still I Rise, similar to those for which the data subject has shown interest or participated, for a legitimate purpose due to the Data Controller's legitimate interest in promoting its activities and raising awareness of its mission, in accordance with Article 6, paragraph 1, letter f) of the GDPR and Article 130, paragraph 4 of the Privacy Code. In this case, the data will be retained by the Data Controller for 2 years starting from the year of the last interaction.

➢ Carry out informational and promotional activities related to the initiatives, projects, events, and awareness and fundraising campaigns promoted by Still I Rise, as well as conduct analysis and surveys, including those of social interest, with the prior consent of the data subject, in accordance with Article 6, paragraph 1, letter a) of the GDPR and Articles 130, paragraphs 1 and 2 of the Privacy Code. In this case,

the data will be retained by the Data Controller for up to 2 years starting from the year of the last interaction.

➢ Monitor, through the use of tracking pixels embedded in email communications, whether the communications sent have been opened and viewed, as well as the related interactions, in order to individually measure and analyze the effectiveness and performance of such communications, improve the relevance and delivery methods of informational and promotional campaigns and, where applicable, adjust the frequency and content of communications based on the interest shown by the data subject. The processing is carried out subject to the data subject's consent, pursuant to Article 122 of Legislative Decree No. 196/2003 (the "Italian Privacy Code") and Articles 6(1)(a), 7 and 13 of the GDPR. The data and information collected through such tools will be retained for the period necessary to pursue the purposes indicated above, in compliance with the principles of data minimization and proportionality, without prejudice to any further retention requirements provided for by law or related to the establishment, exercise or defense of a right.

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 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 mainly processes the following categories of personal data (hereinafter referred to as 'Data'): Identification data, Contact data, Address data, Data related to purchases or use of services, Data related to other ongoing and/or past relationships, Data derived from browsing or interaction with online channels.

4. SOURCES OF DATA COLLECTION.

The data is collected by the Data Controller directly from the data subject or from third parties who collect the data and share it with Still I Rise (e.g., in the case of participation in events or projects or other partner organizers for webinars or events).

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:

- 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);
- 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;
- 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:

- 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 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.

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.

Rome, 29/09/2026

Still I Rise APS