

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter the "GDPR")

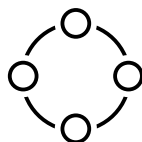
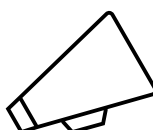
Dear Sir/Madam,

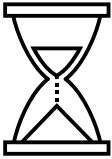
We hereby inform you that ACSI – Associazione di Cultura, Sport e Tempo Libero Associazione di Promozione Sociale (hereinafter "ACSI" or "the Organisation"), in its capacity as Data Controller, will process the personal and/or special category data collected via the membership application form submitted to the affiliated association/club or directly to ACSI, for the purposes and in the manner set out below.

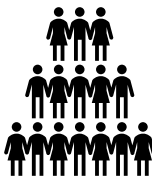
1. Nature and categories of data	1.1.	The personal data may relate to the following data subjects: athletes, sports coaches, officers of affiliated organisations, national and local officers, referees and, more generally, all other individuals for whom membership is required. In the case of minors, where the relevant data are provided by their parents or persons exercising parental responsibility (see Article 8 of the GDPR), the personal data relating to the minor member, as well as the personal data of the parent or person exercising parental responsibility (e.g. identification and contact details), will be processed.		
	1.2.	With regard to the categories of personal data, the following data will be processed:		
	1.2.1.	Ordinary personal and identification data [e.g. first name, surname, nationality, place and date of birth, tax identification number, contact details (domicile and residential address, email address and/or certified email address (PEC), telephone number), as well as photographs and/or videos registered members, either individually or in groups].		
	1.2.2.	Special categories of personal data [e.g. information concerning general health and the related fitness or unfitness to carry out certain activities, where such information may be inferred from the medical certificate provided; any information concerning religious beliefs that may be inferred from requirements relating to religious holidays and/or dietary preferences; information concerning any disabilities; and any data concerning ethnic origin].		
2. Legal basis and purposes of processing	ACSI uses the above data to handle and respond to requests for contact and information and to process membership applications submitted by the registered member, as well as to pursue its institutional purposes, comply with the legal and regulatory obligations to which the Data Controller is subject in connection with its activities and, where applicable, carry out promotional activities. More specifically, the legal bases for the processing of your data and the corresponding purposes are set out below.			
		LEGAL BASES	PURPOSES OF PROCESSING	
	2.1.	The processing of the data referred to in point 1.2.1. is based on Article 6(1)(b) of the GDPR: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract” and (c) of the GDPR: “processing is necessary for compliance with a legal obligation to which the controller is subject”	Requests for contact and/or information materials for membership purposes The processing of personal data is intended to enable: (i) the preliminary activities relating to the membership application; (ii) the provision of the services offered by ACSI; (iii) the handling of requests for information, contact and information materials; and (iv) compliance with any other obligations arising from the membership application.	
	2.2.	The processing of the data referred to in points 1.2.1 is based on Article 6 (1)(b) of the GDPR:	Membership and institutional purposes: The processing is carried out for the following purposes (i) the administrative and insurance-	

		<i>“processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”, and (c) of the GDPR: “processing is necessary for compliance with a legal obligation to which the controller is subject”, (f) of the GDPR: “processing is necessary for the purposes of the legitimate interests pursued by the controller [...]” and, with regard to the data referred to in point 1.2.2., in Article 6(1)(c) of the GDPR: “processing is necessary for compliance with a legal obligation to which the data controller is subject” as well as on Article 9(2)(g) of the GDPR: “processing is necessary for reasons of substantial public interest on the basis of Union or Member State law [...]”.</i>	related activation and management of membership, including the payment of membership fees, the handling of any insurance claims and the related dealings with insurance companies, as well as the creation of the relevant user account in ACSI’s IT systems; (ii) the performance of the membership relationship, including any related or ancillary activities, such as training and/or refresher courses delivered in person or through digital platforms, as well as the provision of services (e.g. educational activities, courses for technical staff, training programmes for coaches, etc.) and, more generally, compliance with all obligations arising from the membership relationship, as provided for in ACSI’s Articles of Association, regulations and resolutions adopted by its governing bodies. WITH REGARD SOLELY TO THE PROCESSING OF PERSONAL DATA RELATING TO SPORTING ACTIVITIES: (iii) the management of the registered member’s technical and sporting status in connection with participation in competitions, sporting events and/or other sporting activities at local, regional, national and international level; (iv) the inclusion and/or publication, in specific lists made available on ACSI’s official website, of results achieved in the aforementioned sporting events, standings/rankings or any other individual or team classification; (v) the taking and collection of video footage and photographs relating to ACSI’s internal institutional activities (e.g. meetings, ceremonies, calls for applications or other initiatives, however designated, connected with or related to the pursuit of ACSI’s institutional purposes); and (vi) the sending, by post, e-mail or other automated means of communication, of institutional communications concerning competitions, training camps and/or sporting events organised by ACSI. Sports justice purposes: The processing is carried out for the purpose of managing any disciplinary and sanctioning proceedings within ACSI’s internal sports justice system and/or before sports justice bodies, including international bodies, at any level or instance, as
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			well as for the establishment, exercise or defense of rights before the competent disciplinary, arbitral and judicial authorities. Preventive and sports medicine purposes: The process is carried out for the purpose of assessing the registered member's physical fitness and/or personal suitability and protecting the registered member's health in connection with sporting activities.
	2.3.	The processing of the data referred to in points 1.2.1., and specifically photographs and audio and video recordings, is based on Article 6(1)(f) of the GDPR: <i>"processing is necessary for the purposes of the legitimate interests pursued by the data controller [...]"</i>.	WITH REGARD SOLELY TO THE PROCESSING OF PERSONAL DATA RELATING TO SPORTING ACTIVITIES: Sports information and historical archive purposes The processing is carried out for the purpose of collecting photographs and other images relating to sporting competitions and events included in the national calendar. Such photographs and images may be disclosed and disseminated in any form, including through ACSI's official website, its social media channels, the print media and/or any other means of dissemination.
	2.4.	The processing of the above data and, specifically, the data referred to in point 1.2.1, including photographs and audio and video recordings, is based on Article 6(1)(a) of the GDPR: <i>"the data subject has given consent to the processing of their personal data for one or more specific purposes"</i>	Direct marketing purposes: The processing is carried out for the purpose of conducting promotional and institutional marketing activities relating to ACSI's activities and public image, as well as promoting the values of sport, culture and social promotion; sending commercial communications through traditional means (e.g. postal mail) and automated means (e.g. email, SMS and notifications); and carrying out advertising and sponsorship activities in connection with sporting events, tournaments and competitions.
	2.5.	The processing of the above data and, specifically, the data referred to in point 1.2.1, including photographs and audio and video recordings, is based on Article 6(1)(a) of the GDPR: <i>"the data subject has given consent to the processing of their personal data for one or more specific purposes"</i>	Indirect marketing purposes and disclosure of data to partners and sponsors for promotional activities: in certain cases, for example in order to provide information about promotions, including commercial promotions, relating to the services offered or future initiatives, ACSI may carry out indirect marketing activities through third parties and may disclose or transfer your contact details to partners or sponsors for the purpose of enabling them to send you promotional and/or commercial communications, including communications

			relating to the sponsorship of sporting, cultural and social-promotion events, tournaments and other initiatives, through traditional means (e.g. postal mail) and automated means (e.g. email, SMS and notifications).
3. Processing methods 	The processing of your personal data for the purposes set out above is carried out in accordance with procedures strictly related to those purposes and, in any event, in such a way as to ensure the security and confidentiality of the data, in full compliance with the principles set out in Article 5 of the GDPR, including the principles of proportionality and data minimisation. Accordingly, only personal data that are strictly necessary for the purposes pursued will be processed, and the processing methods used will be relevant and not excessive in relation to those purposes. Personal data will be processed both by automated means, through dedicated IT platforms and, on an optional basis, through the registered member App for those who choose to use this service, and by non-automated means (e.g. in paper form). More specifically, the processing of personal data may include the operations referred to in Article 4(2) of the GDPR and, in particular, the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.		
4. Nature of the provision of data and consequences of any failure to provide them 	4.1.	About the purposes referred to in points 2.1. and 2.2. above, the provision of personal data, including ordinary personal data and special categories of personal data, is strictly necessary for the establishment and management of the membership relationship and for compliance with the obligations arising therefrom, including legal obligations. Failure to provide such data will make it impossible to establish or continue the relationship.	
	4.2.	Regarding the purposes referred to in point 2.3, the provision of personal data is optional. However, failure to provide such data will prevent you from participating in the sporting competitions and events included in the national calendar, as such events are filmed and/or photographed.	
	4.3.	The provision of personal data for the purposes referred to in point 2.4 above (direct marketing) is optional, and the relevant consent may be withdrawn at any time, without affecting the proper performance of the services provided under the membership relationship.	
	4.4.	The provision of personal data for the purposes referred to in point 2.5 above (indirect marketing and disclosure of data to partners and sponsors for promotional purposes) is optional, and the relevant consent may be withdrawn at any time, without affecting the proper performance of the services provided under the membership relationship.	
5. Scope of data disclosure 	ACSI discloses your personal data to parties who will process them as independent data controllers or, where required by the nature of their relationship with the Organisation and in full compliance with applicable data protection legislation, as data processors expressly appointed pursuant to Article 28 of the GDPR and provided with specific instructions concerning the processing of personal data. More specifically, your personal data may be disclosed to:		
	5.1.	all parties to whom such disclosure is necessary for the pursuit of the purposes set out above or is required pursuant to specific legal obligations (for sporting activities: the Department for Sport, Sport e Salute S.p.A., CONI, CIP, FIE, IWAS, EFC and the	

		organizing committees; for Third Sector activities: the Ministry of Labour and Social Policies);
	5.2.	the association/organization to which you belong, ACSI's local committees and suppliers (e.g. companies responsible for maintaining the database in which your data are stored) which, insofar as they process personal data on behalf of ACSI, are appointed as Data Processors pursuant to Article 28 of the GDPR. The list of such Data Processors is kept up to date by the Data Controller and is available from the Data Controller for consultation;
	5.3.	authorized persons (pursuant to Article 29 of the GDPR and Article 2-quaterdecies of Legislative Decree No. 196/2003, as subsequently amended) who carry out specific processing operations under the authority of the Data Controller and have been duly instructed for such purposes (e.g. members of ACSI's governing bodies, employees and other persons collaborating with ACSI in various capacities);
	5.4.	with specific regard to photographs and video recordings collected in connection with sporting, cultural, social-promotion or institutional events, such material may be disseminated through ACSI's social media channels and official website.
6. Transfer of data abroad 	6.1.	Personal data are stored on servers located in Italy and within the European Union. However, should this become necessary, the Data Controller may transfer the data to servers located outside the European Union. In such cases, the Data Controller will ensure that any transfer is carried out in accordance with applicable law and, in particular, with the provisions of Chapter V of the GDPR.
	6.2.	WITH REGARD SOLELY TO THE PROCESSING OF PERSONAL DATA RELATING TO SPORTING ACTIVITIES: where strictly necessary for the pursuit of ACSI's institutional purposes relating to membership (for example, participation in international sporting competitions and procedures for entry into the relevant non-EU host countries), certain personal data relating to registered members may be transferred to non-EU countries and/or international organisations. In such cases, ACSI will carry out the transfer only where the destination country is one which the European Commission has determined ensures an adequate level of protection pursuant to Article 45 of the GDPR, or where one of the other conditions permitting such transfer under Articles 46 and 47 of Regulation (EU) 2016/679 is met. In any event, where the requirements set out above apply, such transfer may also be carried out pursuant to Article 49 of the GDPR where it is necessary for the performance of obligations arising from the membership relationship and/or for the performance of commitments undertaken by ACSI in the interest and for the benefit of the registered members, including commitments of a contractual nature, or, finally, for the pursuit of the legitimate statutory interests of ACSI pursuant to Article 6(1)(f) and Article 49(1), second subparagraph, of the GDPR.
7. Data retention period 	Your personal data will be retained for as long as required under applicable law, in accordance with the principle of data minimisation set out in Article 5(1)(c) of the GDPR and, in any event, for no longer than is necessary to achieve the purposes set out above. More specifically:	
	7.1	Personal data relating to the contractual relationship or the services requested will be retained for the entire duration of the membership relationship and, thereafter, for as long as required under applicable law and strictly necessary for the pursuit of the purposes set out above and, in any event, for no longer than 10 (ten) years following termination of the membership relationship.

	7.2.	Photographs and audiovisual recordings will be retained for no longer than is necessary to achieve the purposes set out above. Periodic reviews will be carried out to assess whether their continued retention remains necessary.
	7.3.	Personal data processed for direct or indirect marketing purposes, or disclosed to third parties for promotional purposes, will be retained for 12 months from the data subject's last contact with ACSI, unless the consent originally given is withdrawn before the expiry of that period.
8 Data Controller 	ACSI – Association for Culture, Sport and Leisure, a social promotion association with its registered office at Via di Montecatini 5, Rome, and its operational headquarters at Via Ostiense 160/e, Rome, 0668100037; e-mail info@acsi.it ; certified email (PEC) presidenza@pec.acsi.it .	
9. Data Protection Officer 	ACSI has appointed Mr Marco Ferrante, a lawyer, as its <i>Data Protection Officer (DPO)</i> , who can be contacted at the following email address: dpo@acsi.it	
10. Rights of data subjects 	At any time, you may obtain information about the personal data concerning you, how they were collected, and whether they are accurate, complete, up to date and securely stored, and you may request their rectification or erasure pursuant to Articles 16 and 17 of the GDPR. You also have the right to receive the personal data you have provided and which are processed on the basis of your consent in a structured, commonly used and machine-readable format, and to withdraw at any time any consent you may have given to the processing of your personal data. Pursuant to Article 21 of the GDPR, you have the right to object, entirely or in part, to the processing of your personal data on grounds relating to your situation. Where personal data are processed for direct marketing purposes, you have the right to object at any time to their processing for such purposes. These rights may be exercised by submitting a specific request to the Data Controller by registered mail or certified email (PEC). You also have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).	

The Data Controller

