

# PRIVACY POLICY Regulation 679/2016/EU Privacy Policy - ROME HALF MARATHON

Pursuant to and for the purposes of article 13 of Regulation 679/2016/EU "General Data Protection Regulation", we inform you that Roma Capitale processes the personal data you have provided and freely communicated. Roma Capitale guarantees that the processing of your personal data is carried out with respect for your fundamental rights and freedoms, as well as your dignity, with particular reference to confidentiality, personal identity and the right to protection of personal data.

### 1. Personal data controller (Art. 13.1.a Regulation 679/2016/EU)

The Data Controller is Roma Capitale. As of today's date, any information pertaining to the Data Controller, together with the updated list of designated Data Processors and System Administrators, can be found at Palazzo Senatorio, via del Campidoglio 1, 00186 Roma; PEC: protocollo.gabinettosindaco@pec.comune.roma.it.

### 2. <u>Data Protection Officer (DPO) / Data Protection Officer (DPO)</u> (Art. 13.1.b Regulation 679/2016/EU)

The Data Protection Officer ("DPO") of Roma Capitale can be reached at the following e-mail address: dpo@comune.roma.it

### 3. Categories of personal data

As part of the services provided and depending on the type of services requested, we will collect the following categories of data:

- Identifying data (including biodata, contact details etc);
- contractual data (including data needed to participate in events, payment and billing data, services provided etc.);
- data related to sports eligibility (only if the participant's eligibility for sporting activity is a prerequisite for
  participation in such sporting event, based on Art. 9, 2 par., lett. h of the GDPR, in accordance with the regulations
  on health protection set forth in the Decree of the Ministry of Health of February 18, 1982, as amended and
  supplemented).

### 4. Purposes of personal data processing and legal bases (Art. 13.1.c Regulation 679/2016/EU)

The different purposes for processing your personal data, the corresponding legal bases legitimizing the processing, and the retention periods are shown in the table below:

PURPOSE	BASIS OF	STORAGE TIME
	LAWFULNESS	
<b>4.1 Contractual Purposes</b> - The personal data provided will be processed by the Data Controller to conclude a contract and fulfill contractual and pre-contractual obligations. Activities that fall under this purpose include all those necessary to provide the services requested, including registering or enrolling you in the event, having you attend the event, managing the contract, and providing support and assistance.	Performance of the contract to which the data subject is a party or the execution of precontractual measures adopted at the request of the same (Art. 6 par.1 lett. b of EU Regulation 679/2016)	Data will be retained until the end of the service provided, termination or request for deletion by the data subject, and in any case within the statute of limitations of rights (10 years)
<b>4.2 Administrative Accounting Management Purposes</b> - The personal data provided will be used to carry out operations of an administrative, managerial, financial, and accounting nature related to internal organizational needs, including those related to the right to the protection of rights in court.	The processing is necessary to comply with a legal obligation to which the data controller is subject; (Art. 6 par.1(c) of EU Regulation 679/2016)	Data will be retained for the period of prescription of rights and any additional retention periods provided by accounting and tax laws
4.3 Direct Marketing Purposes - Only with your explicit and specific consent, data may be used to conduct market surveys, promotional activities and send commercial information about the Owner's services, products and promotional initiatives, through the use of all available automated and non-automated means of communication (such as: paper mail, telephone, e-mail, text messages, chat and notifications).	Consent (Art. 6 par.1 lett. a) of EU Regulation 679/2016)	Data will be kept until consent is revoked or deleted and within 2 years of collection.
4.4 Purposes of communication to third parties for direct marketing - Only with your explicit and specific consent, your data may be provided to other companies and specific entities or operating in the sectors of sports, organization of sporting and non-sporting events, publishing, financial, insurance, automotive, sports, energy, FMCG, food & beverage, fashion, luxury, health, large-scale retail,	Consent (Art. 6 par.1 lett. a) of EU Regulation 679/2016)	Communication can be made within 2 years after the event.



transportation, humanitarian and charitable organizations which may contact you for autonomous initiatives for market surveys and sending commercial information about services and promotional initiatives, through the use of all available automated and non-automated means of communication (such as e.g: paper mail, telephone, e-mail, sms, chat and notifications).		
4.5 Purpose of photo and video publication: publication and/or dissemination and/or preservation in any form of one's own images and/or video footage taken in the context of the Rome Half Marathon event and its side events, on the official website and Social Media (Facebook, Twitter, Instagram, Youtube), in print media and/or any other medium of dissemination, with informative and promotional purposes.	Consent (Art. 6 par.1 lett. a) of EU Regulation 679/2016)	The data will be retained until the Data Subject requests deletion or withdraws consent to publication, or at most as long as the Data Controller's social channels are active.

### 5. The modalities of the processing of personal data

The processing of your personal data is carried out at the offices and premises of the Data Controller or, should it be necessary, at the entities indicated in paragraph 7, using both paper and computer media, by both telephone and telematic means, including by means of automated tools suitable for storing, managing and transmitting the data, with the observance of all precautionary measures, which guarantee their security and confidentiality.

Processing will be developed in such a way as to minimize the risk of destruction or loss, unauthorized access, and processing that is not in accordance with the purposes of the data collection itself. Your personal data are processed:

- in compliance with the principle of minimization, in accordance with Articles 5.1.c and 25.2 of Regulation 679/2016/EU;
- lawfully and in a fair manner.

Your data are collected:

- For specified explicit and legitimate purposes;
- exact and if necessary updated;
- Relevant, complete, and not excessive in relation to the purposes of processing.

# 6. Nature of collection and consequences of failure to provide personal data (Art. 13.2.e Regulation 679/2016/EU)

The provision of data for the purposes indicated in paragraphs 4.1 and 4.2 of Section 4 is necessary for the management and conclusion of the contract. Failure to provide them will result in failure to provide the requested service, its proper performance and any legal obligations. For the purposes indicated in points 4.3, 4.4 and 4.5 of paragraph 4, the provision of data is optional subject to explicit consent. If consent is not given, direct marketing activities, communication to third parties for direct marketing and photo and/or video publication cannot be carried out.

## 7. Disclosure and dissemination of personal data (Art. 13.1.e Regulation 679/2016/EU)

Your personal data, should it be necessary, may be communicated (by which term is meant the giving of knowledge to one or more specific persons) to:

- Subjects whose right of access to data is recognized by legal provisions, secondary and EU regulations;
- authorized persons such as collaborators, employees and consultants of Roma Capitale, within the scope of their duties and/or for the performance of activities related to the contractual obligations entered into by the interested parties;
- Data Processors designated under Article 28 of the EU Regulation 2016/679, acting on behalf of Roma Capitale to carry out activities instrumental to the provision of services subscribed to by the data subject;
- third parties acting as Autonomous Holders for the achievement of the intended purpose at point 4.4
   "Purposes of communication to third parties for direct marketing" for which explicit consent has been provided. Third parties include RCS Sports & Events S.r.l., RCS Sport S.p.a., SSD RCS Active Team a.r.l. and Roma Ostia s.s.d.

Your personal data are not disseminated under any circumstances, by which term is meant the giving of knowledge in any way to a plurality of unspecified parties, subject to legal obligations.

# 8. Criteria used in order to determine the retention period (Art. 13.2.a Regulation 679/2016/EU)

The retention periods of personal data for the different purposes indicated in Paragraph 4, or the criteria used to determine these periods, were stated in Paragraph 4.

# 9. Rights of the Data Subject (Art. 13.2.b Regulation 679/2016/EU)



Notice is hereby given that, at any time, the interested party may exercise:

- Right to ask the Data Controller, ex Art. 15 Reg. 679/2016/EU, for access to their personal data;
- Right to ask the Data Controller, ex Art. 16 Reg. 679/2016/EU, to be able to rectify one's personal data, where the latter does not contravene current legislation on data retention;
- Right to ask the Data Controller, ex Art. 17 Reg. 679/2016/EU, to be able to delete one's personal data, where the latter does not contravene current legislation on data retention;
- Right to ask the Data Controller, ex Art. 18 Reg. 679/2016/EU, to be able to restrict the processing of their personal data:
- Right to object to processing, ex Art. 21 Reg. 679/2016/EU.
- Right to revoke, at any time, the consent given for the purposes specified in 4.3 and 4.4 without affecting the lawfulness of the processing based on the consent given before revocation

The above rights may be exercised by contacting the Holder's PEC address.

### 10. Right to complain (Art. 13.2.d Regulation 679/2016/EU)

The data subject is advised that he/she has the right to lodge a complaint with the Data Protection Authority (Art. 77 GDPR), which can be contacted atgarante@gpdp.it or through the website http://www.gpdp.it. or to take appropriate legal action (Art. 79 GDPR)

REQUEST FOR CONSENT FOR THE USE OF PERSONAL DATA OF THE *INTERESTED* PARTY FOR THE PURPOSES REFERRED TO IN POINTS 4.3. and 4.4 OF PARAGRAPH 4 OF THE *DISCLOSURE STATEMENT - ROME HALF MARATHON* 

Following the Regulations and Terms and Conditions as well as the Privacy Policy received from Roma Capitale:

 $\square$  I declare that I am of legal age, that I accept the rules and terms and conditions of use, and that I have read the <u>privacy</u> policy drafted in accordance with EU Regulation 679/2016. 1. Authorization to process my data in order to receive promotional information and opinion polls by mail, telephone, e-mail, sms, notifications (direct marketing purpose -indicated in paragraph 4.3 of the policy). □ I agree ☐ I do not consent 2. Authorization to disclose my data to third-party companies in order to receive promotional information and opinion polls by mail, telephone, e-mail, text messages, notifications (Purpose of communication to third parties for direct marketing indicated in paragraph 4.4 of the policy). □ I agree ☐ I do not consent 3. Authorization to use by the Owner free of charge, without time limits, including pursuant to Articles 10 and 320 of the Civil Code and Articles 96 and 97 of Law 22.4.1941, no. 633 (Copyright Law), to the publication and/or dissemination and/or preservation in any form of its own images and/or video footage taken in the context of the Rome Half Marathon event and its side events, on the website and official Social Media (Facebook, Twitter, Instagram, Youtube), in print media and/or any other medium of dissemination, with informative and promotional purposes. The authorization does not allow the use of

the images in contexts that harm the personal dignity and decorum of the undersigned and, in any case, for use and/or purposes other than those indicated above. As a supplement to the privacy policy, we inform you that your data will be processed for the purposes indicated above and will be kept, due to the nature of the publication itself, as long as the channels of dissemination of the images are active (website, facebook page, etc.), unless consent is revoked. The provision of consent is optional. In case of failure to provide data, we will not be able to use your image for promotional purposes.

☐ I agree ☐ I do not consent

**Rome Capital** 

Department of Major Events, Sports, Tourism and Fashion

The Data Controller