

## INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA (pursuant to EU Regulation 2016/679)

**Opera Universitaria**, with registered office in Trento, Via della Malpensada 82/A, tax code 80003390228 and VAT number 0045334022, certified email address [operauniversitaria@pec.operauni.tn.it](mailto:operauniversitaria@pec.operauni.tn.it) (hereinafter referred to as the "Data controller"), in its capacity as data controller, informs you, pursuant to EU Regulation no. 2016/679 (hereinafter abbreviated to "GDPR"), that your data will be used in the following ways and for the following purposes:

### **A. Subject of the Processing**

The Data controller processes personal identification data (name and surname, personal details, phone number, residence, email address, payment details, billing data) relating to applicants for spaces – hereinafter referred to as "personal data" or "data" - provided by you at the conclusion of each contract for the Data controller's services.

### **B. Purposes of Processing and Legal Basis for Processing**

**1)** Your personal data will be used to:

- comply with the management procedures for users of the "Palestra Sanbàpolis" gym
- carry out all the activities necessary for the provision of the services you intend to use
- fulfill pre-contractual, contractual, and tax obligations arising from existing relationships with you;

The legal bases for processing are therefore indicated in Article 6(b) and (c) of EU Regulation 2016/679 (performance of a contract and compliance with legal obligations).

**2)** Only with your **prior**, specific and distinct consent (Art. 6(a) and Art. 7 of the GDPR), for the following purposes:

- To send you newsletters, commercial communications, and/or advertising material on products or services offered by the Data controller, and to survey your level of satisfaction with the quality of services, via email, post, and/or text message, and/or telephone contact.

The legal basis for processing in this case is therefore the user's consent.

### **C. Methods of processing**

Your personal data is processed by means of the operations indicated in Article 4(2) of the GDPR, namely: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, limitation, communication, erasure, and destruction of data. Your personal data is subject to processing both in paper form and in electronic and/or automated form. The Data controller will process personal data for the time strictly necessary to fulfill the above purposes and in particular:

- payment and tax billing data: 10 years from the last payment in accordance with tax regulations
- user's personal data, access data, and additional unnecessary data: 24 months from the last entry
- contact data for sending commercial communications, newsletters, and surveys: 24 months from the last consent or until revocation

### **D. Access to data**

Your data may be made accessible, for the purposes referred to in point B, to employees and collaborators of the Data controller or external companies appointed to manage them, in their capacity as persons in charge of and/or responsible for processing and/or system administrators.

### **E. Communication of data**

Without the need for express consent - see Article 6(b) and (c) of the GDPR - the Data controller may communicate your data for the purposes referred to in point B.1 to supervisory bodies, judicial authorities, insurance companies for the provision of insurance services, as well as to all subjects to whom communication is mandatory by law for the fulfillment of the aforementioned purposes. These subjects will process the data in their capacity as independent data controllers. Your data will not be diffused.

### **F. Data transfer**

Personal data is stored on servers located in Trento, within the European Union. In any case, it is understood that the Data Controller, where necessary, will have the right to move the servers outside the EU. In this case, the Data Controller hereby guarantees that the transfer of data outside the EU will take place in accordance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

### **G. Nature of data provision and consequences of refusal to respond**

The provision of data for the purposes referred to in point B.1 is mandatory. Without this data, we will not be able to guarantee the Services referred to in point B.1. The provision of data for the purposes referred to in point B.2 is instead optional. You may therefore decide not to provide any data or to subsequently deny the right to process data previously provided: in this case, you will not receive newsletters, commercial communications, and advertising materials relating to the Services offered by the Data Controller. However, you will continue to be entitled to the Services referred to in point B.1.

### **H. Rights of the data subject**

As a data subject, you have the rights of access referred to in Articles 15-21 of the GDPR, namely the right of access, the right to rectification, the right to erasure ("right to be forgotten"), the right to restriction of processing, the right to data portability, the right to object, and the right to lodge a complaint with the Supervisory Authority.

### **I. How to exercise your rights**

You may exercise your rights at any time by sending: a registered letter with return receipt or a certified email to Opera Universitaria at the above addresses.

### **L. Data Protection Officer (DPO)**

The Data Controller has appointed a Data Protection Officer (DPO) whose contact details are: [dpo@operauni.tn.it](mailto:dpo@operauni.tn.it)

**DECLARATION OF CONSENT TO THE PROCESSING OF PERSONAL DATA (Article (6) and (7) GDPR)**

The interested party declares that they have received complete information pursuant to Articles 13 and 14 of EU Regulation 2016/679 (GDPR), together with

a copy of Articles 15-21 of the same regulation, and ACKNOWLEDGES:

- That the processing of personal data is mandatory for the provision of the Services and the communication of data classified as personal by the aforementioned law within the limits, for the purposes and for the duration specified in the information notice;

The data subject also gives their CONSENT: (check the options for which consent is given)

- to the processing and communication of your personal identification and/or specific data in the manner and for the purposes indicated in point B.2 of the privacy policy (newsletters, commercial/advertising communications on products or services offered by the Data Controller, and surveys on the level of satisfaction with the quality of services)

Trento, the \_\_\_\_\_

\_\_\_\_\_  
*Legal Representative's Signature*