

Privacy Policy – CDP Institute Italy

BitBang S.r.l. as founder of the Italian chapter of the CDP Institute, with registered offices in Bologna, Via Enrico Mattei no. 102, VAT number 02329121202 (hereinafter, “**CDP Institute Italy**”, “**CDP Italian Chapter**” or “**Data Controller**”), is committed to protecting the online privacy of the users of the www.cdpinstitute.org website (hereinafter, “**Website**”). As such, this document (hereinafter, “**Privacy Policy**”) has been written according to Article 13 of EU Regulation 2016/679 (hereinafter, the “**Regulation**” or “**GDPR**”), in order to allow you to understand our policy regarding your privacy, and how your personal data will be handled when using our Website. This Privacy Policy contains important information regarding the protection of your personal data so that you are able to consent to the processing of your personal data in an explicit and informed manner, where appropriate.

The information and data which you may provide, or which may otherwise be collected through the Website, in the context of your use of CDP Institute Italy services (hereinafter, the “**Services**”), as better defined in [Section 3](#), will be used in compliance with the principles of lawfulness, fairness, transparency, purpose limitation, storage limitation, data minimization, accuracy, integrity and confidentiality.

TABLE OF CONTENTS

1. Data Controller
2. Personal Data processed
 - a. Personal Data provided voluntarily by the data subject
 - b. Third party Personal Data provided voluntarily by the user of the Website
 - c. Browsing data
 - d. Cookie Policy
3. Purpose of the processing
4. Legal bases and mandatory/optional nature
5. Recipients of Personal Data
6. Transfers of Personal Data
7. Retention of Personal Data
8. Data subjects’ rights.
9. Amendments

1. Data Controller

BitBang S.r.l. as founder of the Italian chapter of the CDP Institute as identified at the beginning of this Privacy Policy, is the Data Controller regarding all personal data processed through the Website. It is possible to contact BitBang’s at any time by writing to: privacy@bitbang.com.

2. Personal Data processed

As you use the Website, we inform you that the Data Controller may collect and process your personal data, which may consist of – also depending on your decisions regarding use of the Services – an identifier such as your name, an identification number, an online identifier (“**Personal Data**”). Your Personal Data may be collected either because you voluntarily provided it (for example, when filling out an online form) or simply by analysing your behaviour on the Website. Personal Data which may be processed through the Website are as follows:

a. Personal Data provided voluntarily by the data subject

In some sections of the Website you may be asked to enter information such as your name, surname, email address or other.

b. Third party Personal Data provided voluntarily by the user of the Website

As mentioned above, in some forms present on the Website you may insert free text messages or information, visible to the Data Controller, which could contain the Personal Data of third parties. In any situation where you decide to share Personal Data related to other persons through the Website, you will be considered as an independent data controller regarding that Personal Data and must assume all inherent legal obligations and responsibilities. To this end, you must fully indemnify CDP Institute Italy against any

complaints, claims or demands for compensation for damages which may arise from the processing of such Personal Data, initiated by the third parties whose Personal Data have been processed through the use of the Website in violation of the applicable rules on personal data protection. In any case, if you provide or in any other way process the Personal Data of third parties while using the Website, you henceforth guarantee – assuming all related responsibilities – that this specific processing is grounded on an appropriate legal basis in accordance with Article 6 of the GDPR, which legitimizes the processing of the information in question.

c. Browsing Data

The Website's operation, as is standard with any website on the Internet, involves the use of computer systems and software procedures, which collect information about the Website's users as part of their routine operation. While CDP Institute Italy does not collect this information in order to link it to specific users, it is still possible to identify those users either directly via that information, or by using other information collected – as such, this information is also considered Personal Data.

This information includes several parameters related to your operating system and IT environment, including your IP address, location (country), the domain names of your computer, the URI (Uniform Resource Identifier) addresses of resources you request on the Website, the time of requests made, the method used to submit requests to the server, the dimensions of the file obtained in response to a request, the numerical code indicating the status of the response sent by the server (successful, error, etc.), and so on. These data are used exclusively to compile anonymous, statistical information on the use of the Website, as well as to ensure its correct operation and identify any anomalies and/or abuses of the Website – this data is deleted immediately after processing. Such data could be used to ascertain responsibility in the event of computer crimes carried out against the Website or against third parties.

d. Cookie Policy

For information about how CDP Institute manages the tracking technologies and cookies please read the [Cookie Policy](#).

3. Purpose of the processing

The purposes of the processing of your Personal Data collected through the Website are the following:

- a. To provide the Services you request, such as to download materials shared on the Website, request a demo, sign up to events, request a document, subscribe to CDP Institute Italy's newsletter, respond to a request sent to addresses you may find on the Website ("**Provision of the Service**").
- b. Prior your consent, to carry out marketing activities, conduct studies, research, market statistics and send you advertising and information material via e-mail or SMS, and/or over the telephone through operators and/or through the official pages of the Data Controller on social media related to the activities, products and services of the Data Controller ("**Marketing**"). You can, at any time, withdraw the consent that you have previously granted to traditional or automated marketing methods by giving notice to the Data Controller without any formality, simply by writing to the addresses indicated in Section 8 of the Privacy Policy, without prejudice to the lawfulness of the processing based on your previous consent.
- c. To carry out direct marketing activities via e-mail for services similar to those you have subscribed to through the Website, unless you objected to such processing initially or in subsequent communications ("**Soft Spam**").
- d. To fulfil the obligations provided for by law which required the Data Controller to collect and / or further process certain types of Personal Data ("**Compliance**").
- e. To prevent or detect any fraudulent conduct or abuse of the Website in order to allow the Data Controller to defend itself in court ("**Abuse/Fraud**").
- f. To carry out statistical analysis without the possibility to identify the user ("**Statistics**").

h. To disclose your Personal Data (e.g., name, surname and e-mail address) to companies which have sponsorship or partnership relationships with CDP Institute Italy and which operate within the Customer Data Platform field, for their autonomous marketing purposes. The identity of these companies is indicated from time to time on the webpage of the event you register to attend (“**Disclosure to Third Parties**”).

4. Legal basis and mandatory/optional nature

The legal basis of the processing of Personal Data for the purposes referred to in Section 3 are the following:

a. **Provision of the Service:** the processing for this purpose is necessary to provide the Service and for the performance of the contract. The provision of your Personal Data for this purpose is optional, however, failure to provide them would imply the inability to provide the requested Services or to respond to your requests.

b. **Marketing:** the processing for this purpose is based on your prior consent (art. 6(1)(a) GDPR). It is not mandatory for you to give your consent to the Data Controller for this purpose and you can withdraw your consent at any time without any consequences (except for the fact that you will no longer receive marketing communications from the Data Controller). You may withdraw your previously granted consent by following the instructions provided in Paragraph 8 of this Privacy Policy.

c. **Soft Spam:** the processing for this purpose is based on the interest of the Data Controller to send marketing communications by email regarding products and services similar to those requested through the Website. You may interrupt the receipt of these communications without any consequence for you (with the exception that you will no longer receive such further communications of the Data Controller) using the link at the bottom of each of these emails, or by contacting CDP Institute Italy directly.

d. **Compliance:** the processing for this purpose is necessary for BitBang in order to fulfil any legal obligations to which it is subject (art. 6(1)(c) GDPR). When providing Personal Data to the Data Controller, such data must be processed according to the applicable regulations, which could entail their retention and disclosure to the Authorities for accounting, tax or other obligations.

e. **Abuse/Fraud:** the information collected for this purpose will be used exclusively to prevent and / or identify any fraudulent activity or abuse in the use of the Website and therefore allows the Data Controller to protect itself in court.

f. **Statistics:** it is specified that such processing is not performed on Personal Data and therefore can be freely carried out by the Data Controller.

g. **Disclosure to Third Parties:** the processing of your Personal Data for this purpose is based on your consent (art. 6(1)(a) GDPR). The provision of your Personal Data for this purpose is entirely optional and does not affect the use of the Services. If, in any case, you wish to object to the processing of your Personal Data for this purpose you may do so at any time by writing to the Data Controller, without prejudice to the lawfulness of the processing based on your consent given prior to the withdrawal.

5. Recipients of Personal Data

Your Personal Data may be shared with the subjects mentioned below (collectively “**Recipients**”):

a. Subjects typically acting as data processors, namely: persons, companies or professional firms which provide the Data Controller with advice and consulting in accounting, administrative, legal, tax, financial and debt collection matters related to the provision of the Services.

b. Subjects who are engaged with the Data Controller in order to provide the Services (for instance, hosting providers or email platform providers).

c. Persons authorised to perform technical maintenance of the Website (including the maintenance of network equipment and electronic communications networks).

d. Persons authorized by the Data Controller to process the Personal Data required for carrying out activities strictly related to the provision of the Services, who have committed themselves to confidentiality or have an appropriate legal obligation of confidentiality (for example, the employees of BitBang).

e. Subjects, bodies or authorities to whom it is mandatory to disclose your Personal Data to in accordance with Compliance, Abuse/Fraud purposes or under the orders of the authorities.

f. Third parties active in the field of Customer Data Platform for their own autonomous and separate marketing purposes, only if you have given your specific consent.

6. Transfers of Personal Data

Your personal data may be shared with Recipients outside the European Economic Area. The Data Controller ensures that the processing of your Personal Data by these Recipients will take place in compliance with the applicable legislation. Transfers will be made through appropriate guarantees, such as adequacy decisions, Standard Contractual Clauses approved by the European Commission or others. For further information on the transfers of personal data, you may contact BitBang by writing to: privacy@bitbang.com.

7. Retention of Personal Data

Personal Data processed for the **Provision of the Service** purpose will be kept by the Data Controller for the period deemed strictly necessary to fulfil such purposes. In any case, as these Personal Data are processed for the provision of the Services, the Data Controller will retain the Personal Data for the period allowed by Italian law to protect its interests (Article 2946 and ensuing articles of the Italian Civil Code).

Personal Data processed for **Marketing** purposes will be kept by the Data Controller until you withdraw your consent. Once consent has been withdrawn, the Data Controller will no longer use your Personal Data for such purposes, but it may in any case retain them, in particular as may be necessary in order to protect the interests of the Data Controller from possible complaints based on such processing.

Personal Data processed for the **Soft Spam** purpose will be kept by the Data Controller until you object to such processing through the link at the bottom of each of the Soft Spam e-mails received.

Personal Data processed for the **Compliance** purpose will be retained by the Data Controller for the period provided for by specific legal obligations or applicable legislation.

Personal Data processed to prevent **Abuse/Fraud** will be retained by the Data Controller for the time strictly necessary for the aforesaid purpose and therefore until the Data Controller is bound to keep them to protect itself in court to disclose such data to the competent Authorities.

Personal Data processed for **Disclosure to Third Parties** will be processed, as a general rule, until the withdrawal of your consent.

Further information about the data retention period and the criteria used to determine this period can be requested by writing to the Data Controller at the addresses provided in Paragraph 8 of the Privacy Policy.

8. Data subject rights. Contact details of the Data Controller

Under Articles 15 and following of the Regulation, you are entitled to request from CDP Institute Italy, at any time: access to your Personal Data, the correction and erasure of your Personal Data, as well as to object to its processing pursuant to Article 21 of the Regulation. You are also entitled to request the restriction of the processing of your Personal Data in the cases set out in Article 18 of the Regulation, as well as to obtain the Personal Data you have provided to CDP Institute Italy in a structured, commonly used and machine-readable format, in the cases set out in Article 20 of the Regulation.

You may interrupt the receipt of further **Soft Spam** e-mails by clicking on the link found at the bottom of each e-mail received.

Requests should be made in writing to: privacy@bitbang.com or to the physical address of the Data Controller indicated above.

In any case, please note that, as a data subject, you are entitled to file a complaint with the competent supervisory authority (the Italian Data Protection Authority – Garante per la protezione dei dati personali) pursuant to Article 77 of GDPR, if you believe that the processing of your Personal Data carried out through this Website violates applicable law, as well as to seek judicial redress through the courts (Article 79 of the GDPR).

9. Amendments

The Data Controller reserves the right to partly or fully amend this Privacy Policy, or simply to update its content, e.g., as a result of changes in applicable law. The Data Controller will inform you of such changes as soon as they are introduced. The Data Controller therefore invites you to regularly visit this Privacy Policy in order to acquaint yourself with the latest updated version of the Privacy Policy, so that you may always be informed on how the Data Controller collects and uses your Personal Data.

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