



INFORMATION ON THE PROCESSING OF PERSONAL DATA

(Don Bosco Missions - Pontifical Foundation Gravissimum Educations)

Introduction

The present document is intended to clarify purposes, lawfulness of processing and data management collected by the Data Controllers to receive information for "Global Christmas Contest".

Data Controllers

The Data Controllers are:

DON BOSCO VALDOCCO MISSIONS ONLUS Via Maria Ausiliatrice, 32 10152 - Turin Italy Fiscal Code: 97792970010 Mail info@missionidonbosco.org Tel 0113990101.

FONDAZIONE PONTIFICIA GRAVISSIMUM EDUCATIONS: Piazza Pio XII, 00120 Città Del Vaticano SCV Tel 0669881798.

Processing purposes

Participation in an Event - Global Christmas Contest

Personal data is collected by the Data Controllers in order to transfer information about the event "Global Christmas Contest". Personal data will be processed for the following purposes:

1. Purposes strictly related and instrumental to the management of the relationship with the user relating to the provision of services required.
2. Purposes strictly related to the registration and participation in the Global Christmas Contest.
3. Purposes connected with the obligations deriving from laws, regulations and Community legislation as well as from provisions issued by the Authorities to that effect legitimated by law.
4. Functional purposes of the activity of the Data Controllers or of other companies, appointed as Data Processors, which collaborate in the provision of services related to the organization and promotion of the event "Global Christmas Contest".

Legal obligations

Personal data will be processed by the Data Controller in order to fulfil the obligations provided for by Laws, Regulations and/or Community Norms, or by supervisory and control bodies or by other Authorities to that effect legitimated by law.

Personal data will be processed for the following purposes:

1. comply with legal requirements;
2. mandatory digital storage;
3. purposes strictly related to the fulfillment of obligations under the Law;
4. purposes connected with obligations deriving from laws, regulations and Community legislation as well as provisions issued by Authorities to that effect legitimated by law



Transfer of personal data outside the EU

The Controllers transfer your data outside the EU, as the headquarters of the Association Fondazione Pontificia Gravissimum Educations are in the Vatican, therefore outside the EU.

Personal data will be processed for the following purposes:

1. to promote the non-profit purposes of the Pontifical Gravissimum Educations Foundation Association;

Transfer of personal data to third parties - Marketing

The Controllers, with the individual's informed consent, will transfer your personal data to the company Prime Time Promotions srl, organizer of the Global Christmas Contest. The transferred data will be used for the purpose of promoting the non-profit association purposes of the Missioni Don Bosco and Fondazione Pontificia Gravissimum Educations Associations and for the promotion of their products and services.

Personal data will be processed for the following purposes:

1. Promote non-profit purposes of the Don Bosco Association
2. Promote non-profit purposes of the Pontifical Foundation Gravissimum Educations Association
3. Promote Prime Time Solutions srl products and services whilst organizing the event

The Company Prime Time Promotions Ltd. will take care not to exceed in sending communications, limiting the sending to a maximum of 2 per month.

Email Communications

The Data Controller intends to process your personal data in order to send you emails to inform you about social and non-profit initiatives related to the Events, organized by the charitable associations Missioni Don Bosco and Fondazione Pontificia Gravissimum Educations.

Personal data will be processed for the following purposes:

2. to send communications on initiatives of the Don Bosco Missions Associations and the Pontifical Gravissimum Educations Foundation;

The Web and Social Media

Data processing connected with the management of customer care activities on the web, such as: managing responses to requests sent via forms, comments on a Facebook post or the management of a problem reported online. The computer systems and software procedures used to operate this website acquire, during their normal operations, data subjects' personal data and its transmission is implicit in the use of Internet data protocols.

Personal data will be processed for the following purposes:

1. satisfy the user's requests



The Web and Browsing Data

The Controllers intend to process your data in order to ensure the correct functioning of the website and to allow users to brows, to control the correct functioning of the website and to ascertain responsibility in case of hypothetical computer crimes against the Data Controllers.

Personal data will be processed for the following purposes:

1. Website maintenance
2. Ensure computer security and prevent unlawful processing

Facebook Social Page

When you use the Page administered by the Owner, Facebook ("Social Media") collects information such as the types of content viewed or interacted with, the actions performed as well as information about the devices used (IP addresses, operating system, browser, language settings, cookie data). Page Insights are aggregate statistics created from certain events recorded by Facebook's servers when users interact with Pages and the content therein. As explained in Facebook's [Privacy Policy](#), Social Media also collects and uses information to provide statistical data collection services called [Page Insights](#) to Page administrators that help them learn more about their audience and what content resonates with them most. Details on how Facebook processes Page [Insights](#) are available at the following link:

<https://www.facebook.com/privacy/explanation>

Details on the personal data processed for Insights are available at the following

link: <https://www.facebook.com/legal/terms/>

[information about page insights data](#) Details on the cookies used by Facebook,

are available at the following link: <https://www.facebook.com/policies/cookies/>

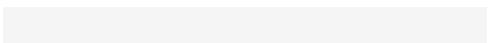
The Data Controller -as administrator of the Page- and Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) are joint data controllers in accordance with Article 26 of the GDPR for the processing of personal data recorded for events delivered through the page [Page Insights](#) (Data Insights).

[The co-ownership agreement](#), between the Owner and Facebook, covers the creation of such events and their aggregation in the Page's Insights provided to each administrator.

The legal basis for the processing is the legitimate interest of the Data Controller, Art. 6(1)(f) GDPR. Therefore, the prior consent to the the processing of personal data is not necessary.

Personal data will be processed for the following purposes:

1. Facebook Page Insights Consultation





Data processor

All processing covered by this Information Notice and the processing of personal data regarding the data subjects is carried out with appropriate manual procedures or with electronic tools by the staff of the Data Controller at its central and/or peripheral offices by the Service Companies Responsible for Processing/Sub-Responsible for the management of the services related to the event. These individuals have been authorized to process personal data, according to Article 28 of Regulation (EU) No. 2016/679, and have received adequate operating instructions, with particular reference to the adoption of appropriate data protection measures and a specific Contract. The Manager appointed for the management and organization of the Global Christmas Contest event is Prime Time promotions srl P.Iva 03752131007 - Via Carlo Poma, 2 - 00195 Rome 06 68 13 67 38 - amministrazione@prime-time-promotions.it.

Lawfulness of Processing

The following legal basis were identified.

The legal basis for the processing of personal data can be found within the relevant regulation:

For "**Participation in an Event - Global Christmas Contest**".

- Fulfillment of Contractual Obligations - Art. 6, c.1, let. b. GDPR
 - a) 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;

For "**Compliance with Law**".

- Legal Obligation - Art. 6, c.1, let. c. GDPR
 - a) processing is necessary for compliance with a legal obligation to which the controller is subject;

For "**Transfer of data outside the EU**".

- Chapter V of the Regulation - Art. 49 paragraph 1 letters b) and c) GDPR
 - a) purposes functional to the activities of the Joint Data Controllers or of other companies, appointed as Data Controllers, which collaborate in the provision of services, in particular the offices of the Pontifical Foundation Gravissimum Educations;

For "**Transfer of data to third parties - Marketing**".

- Consent - Art. 6, c.1, let. a. GDPR
 - a) the person concerned has given consent to the processing of his/her personal data for one or more specific purposes;

For "**Sending Communications by Email**".

- Consent - Art. 6, c.1, let. a. GDPR
 - a) the interested party has expressed consent to receive communications regarding the Events and Activities of the Missioni Don Bosco and the Pontifical Foundation Gravissimum Educations Associations;

For "**Facebook Social Page**".

- Legitimate Interest - Art. 6, c.1, let. f. GDPR
 - a) Facebook Page Insights Consultation



Data Transfer outside the EU

Personal data will be managed by the Don Bosco Missions Association and the Pontifical Foundation Gravissimum Educations based in Vatican City, therefore, outside the EU. Subject to the Guarantees described in Chapter V of the European Regulation 679/2016.

Methods of data processing and storage

Data processing refers to an activity or a sequence of activities such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, comparison or interconnection, limitation, cancellation or destruction of such data.

Data processing is carried out for the above purposes, in accordance with provisions detailed in Article 5 of the Regulation (EU) No. 2016/679, and in compliance with the rules of confidentiality and security provided for by current legislation, so as to prevent unauthorized access or use of personal data. Therefore, personal data are processed and stored in full compliance with the principles of necessity, data minimization and storage limitation, to implement appropriate technical and organizational measures in such a manner that processing will meet the requirements **and ensure the protection of the rights of the data subject**, and for no longer than is necessary for the purposes for which the personal data are processed, in accordance with the Law.

Types of data processed and categories of interested parties

The data processing activities carried out are aimed at the acquisition of the following data: personal data, financial data health data and addressed to the following categories of interested parties: natural persons.

Personal data transfer and consequences of opposition

Personal data transfer is compulsory, and any refusal may make it impossible to participate in the "Global Christmas Contest".

Data transfer to possible recipients

Data may be transferred or communicated, in compliance with applicable regulations, to external companies engaged by the Controller to perform services of various kinds, such as the collection of registrations or the interaction with participants. Therefore, the Data Controller shall designate such entities as Data Processors and Sub-Processors according to Article 28 of Regulation (EU) No. 2016/679, from among those that present sufficient guarantees to put in place adequate technical and organizational measures so that the processing meets the requirements of the Regulation and ensure the rights of data subjects.

Personal data are not subject to dissemination to unspecified subjects, in any form, not even by making them available or through consultation.

Rights of the interested party

The data subject has the right to obtain from the data controller confirmation that the processing of personal data concerning him or her is in progress and, in this case, to obtain access to personal data and the following information: : the purposes of the processing, the categories of personal data in question, the recipients or categories of recipients to whom the personal data have been or will be communicated (including recipients of third countries or international organizations), the retention period of the personal data provided or, if not possible, the criteria used to determine this period, if the data are not collected from the data subject, all information available on their origin;



the existence of an automated decision-making process including the profiling and information on the logic used. In addition, the data subject has the right, in the cases provided for in Regulation (EU) No. 2016/679 in Articles 15 et seq. to obtain:

- the correction of inaccurate personal data.
- the integration of incomplete personal data.
- right to cancellation (right to be OBLIO).
- right to limitation of treatment (if the processing is restricted, such personal data shall only be processed, except for storage with the consent of the data subject and in other cases permitted by law).
- Right to data portability, relating to the portability of data of the data subject in order to obtain direct transmission of personal data from one controller to another, if technically feasible.
- right to opposition.

Relevant requests must be forwarded to the Data Controller, using the contact details provided by the latter in this notice.

Right to lodge a complaint

If the data subject has the right to lodge a complaint before the Data Protection Authority if he/she considers that the processing carried out by the Data Controller infringes the data protection regulations under Article 77 of Regulation (EU) No. 2016/679.

Right to withdraw consent

If the processing is based on consent or activities on specific categories of data, the data subject has the right to withdraw his or her consent at any time, without prejudice to the lawfulness of the processing based on consent provided before the withdrawal.

Storage Times

Personal data will be retained for a maximum of 12 months from the date of last participation, unless required by law.

Privacy notice updated as of 29/03/2021