

PRIVACY POLICY

1) Data controller and categories of data processed

Participation in the Event and the provision of associated services entail the processing of participants' personal data such as: personal data and membership of sports clubs/bodies; images taken via video and photos; transit times and times at checkpoints and/or timing points; geographical location data for participants using a geographical location device and associated services.

Data relating to the health of the person concerned (i.e. data on pathologies derivable from medical certificates or declared directly by the person concerned) may also be processed, where strictly necessary for the purpose of registration and participation in the Event (for example, for the purpose of registration in a special race category reserved for disabled athletes and/or for the purpose of requesting specific assistance) and only with the explicit consent of the person concerned. In such cases, the consent of the data subject is necessary for participation in the Event and failure to provide such consent prevents the completion of registration.

The data controller is the organiser ASD TRACKS, based in Borgo Valsugana (TN), Viale Roma n. 1/B.

2) Purposes and prerequisites of processing

The use of the aforementioned personal data is inherent to the sporting and public nature of the Event, its organisational needs and the provision of services to participants.

The Organiser uses and processes the data, also through its technical and service partners and related companies, for the following purposes: verification of participation requirements; timekeeping and tracking services; medical assistance services; photo and video services for the media and participants (also for a fee); communications to sports and public authorities; reporting and documentation of the Event; promotion and commercial exploitation of the Event.

The preconditions for processing are therefore:

- (i) Provision of services related to the registration of participants in the Event and to the smooth running of the Event (e.g. management of the participant's registration, recording of times and publication of results, or making photos and videos of the Event available to participants);
- (ii) consent of the data subject (e.g. in the case of processing of data relating to health or for marketing purposes, as specified below);
- (iii) pursuit of the legitimate interest of the Organiser and its business partners (e.g. in case of publication of images and results to document the Event);
- (iv) fulfilment of legal obligations (e.g. in the case of communications due to public authorities);
- (v) safeguarding the vital interests of the person concerned or of another person (e.g. in case medical assistance is needed during the Event).

The Organiser draws the attention of all participants to the fact that during the course of the Event video footage and photographs of the participants will be taken, both in motion and in fixed poses; on the basis of the assumptions set out above (in particular, i and iii), the Organiser may use, or allow the sponsors and technical and service partners of the Event to use, such images for the following purposes (a) reporting and documentation of the Event; (b) marketing of photographic and video services of the Event with the consequent offer, free of charge or for a fee, of the photos and videos, for private use only, to all participants and parties authorised by them. The authorisation to shoot one's own image in the context of the Event is a necessary requisite in order to participate in the Event insofar as the modalities of the latter, as described in the Regulations, envisage the video-photographic shooting of the event for documentation purposes and the consequent offer to all participants of services for the purchase of photos and videos of the Event; therefore, failure to authorise the use of one's own image for the aforementioned purposes, as requested in the Release, will result in the impossibility of registering for the Event.

3) Scope of data circulation and dissemination

The Organiser informs the participant that the Event is also organised and run through the services of technical and commercial partners and with the support of sponsors. The services provided by such partners may include: registration services, *tracking services*, timing services, photo and video shooting services and any other services. Some of these services may require or presuppose the registration of the data subject on the partner's platform or otherwise processing carried out by the partner as an independent data controller; in such cases, the data subject is invited to carefully read the privacy policy provided by the partner. The data subject may find out the list of partners and sponsors at any time by writing to the Organiser.

In consideration of the public nature and purpose of the Event, participants also acknowledge and accept that data relating to their image, times and results or their position in real time, where appropriate *tracking services* are in place, may be made publicly accessible through dissemination on the websites of the Organiser, sponsors and service partners of the Event and/or communicated to third parties for the purpose of reporting, documentation and promotion of the Event itself, for the provision of specific services related to the Event, such as the sale of video-photographic services, in the fulfilment of specific legal or regulatory obligations and for the protection of vital interests of participants (e.g. communication to competent authorities and rescue personnel for rescue operations and/or the provision of medical assistance services in the context of the Event).

4) Consent for the advertising exploitation of the participant's image

With the specific and free consent of the person concerned, the Organiser may exploit the footage that includes his/her image for the promotion of the Event and other events organised by the Organiser. The interested party may revoke this consent at any time by writing to the Organiser.

5) Processing for marketing purposes

Where the participant for the purposes of registration for the Event uses his/her email address, the Organiser may use this address, without the prior consent of the participant, to send him/her, including through its service partners, communications of a commercial nature relating to its products and services connected to the Event or in any case to other initiatives and events similar to the Event. The interested party may object at any time to the sending of such communications by writing to the Organiser or by following the specific instructions contained within each communication.

Notwithstanding the above, with the specific and free consent of the interested party, which may be revoked at any time, the Organiser may, either directly or through its service partners:

a) use the participants' contact data (email, address and telephone number) for purposes of commercial information, market research, surveys, direct offers of its own products and services and/or products and services of its service and business partners, through traditional means (i.e. paper mail, telephone calls with operator, etc.) and automated means of communication (i.e. pre-recorded telephone calls, email, fax, sms, mms, app, etc.)

b) transfer to certain categories of third parties (in particular, companies sponsoring the Event and other companies that provide products and services related to the organisation of the Event and, more generally, to the world of sporting activities) the contact data of participants (email, address and telephone number) for the purposes of commercial information, market research, surveys, direct offers of their products and services carried out through traditional means (i.e. paper mail, telephone calls with operator, etc.) and automated communication tools (i.e. pre-recorded telephone calls, e-mail, fax, sms, mms, app, etc.). These third parties will act from time to time as autonomous Data Controllers, with the consequent burden of providing the data subject with their own privacy policy in accordance with the law.

6) Data Retention and Data Processors

Data subjects' data will be stored in the Organiser's computer files and protected by appropriate security measures in line with Article 32 of EU Regulation 2016/679. The data will be kept for as long as necessary in relation to the purposes for which it was collected and possibly for a further period of time if the retention of the data is necessary for the protection of a right of the Organiser or a third party (for example, data related to registration for the Event will be kept for ten years, also in consideration of possible claims by the data subject within the ordinary ten-year limitation period; data relating to the results of the Event will be retained for as long as a current interest in the documentation of the Event is detectable; contact details for sending commercial communications will be retained until the data subject exercises his/her right to object or revokes the consent previously granted; data relating to the image of participants will be retained for as long as the Organiser can legitimately dispose of footage of the Event).

For the purposes of storage and, more generally, processing, the Organiser may use third parties under its own responsibility; these parties, when the legal requirements are met, will be appointed by the Organiser as its Data Processors pursuant to Article 28 of EU Regulation 679/2016. To find out the full list of Data Processors appointed by the Organiser from time to time, the interested party may send a request through the contact details indicated in Art. 9 below).

7) Transfer of data outside the EU

In the case of international data transfers from the European Economic Area (EEA), where the European Commission has recognised that a country outside the EEA is able to guarantee an adequate level of data protection, the data subject's data may be transferred on that basis.

For transfers to non-EEA countries whose level of protection has not been recognised by the European Commission, the Organiser will rely on an exemption applicable to the specific situation or implement one of the following measures to ensure the protection of your data:

- standard contract clauses approved by the European Commission; or
- binding corporate rules, where applicable.

To obtain a copy of these measurements or details on where they are available, please send a written request as indicated in the following article.

8) Minors

The registration of minors at Events is only permitted by the persons exercising parental or legal authority over the minor or who have obtained the necessary prior authorisation from them.

By registering a minor, the person exercising parental or legal authority - or the other person expressly authorised for this purpose by the latter - must, in the name and on behalf of the minor, authorise the photographic and video filming of the minor at the Event for the purposes described in this Information Notice and the Release and consent, where necessary, to the processing of the minor's health data.

Those exercising parental or legal authority over the child may exercise the rights specified in Article 9) below with regard to the child's personal data.

The Organiser does not process the minor's data for marketing purposes or direct offer of products and services; however, the Organiser may process the data of the person exercising parental or legal authority for marketing purposes or direct offer of products and services under the conditions set out in Article 5 above).

9) Rights of the data subject

At any time, the participant may exercise his or her rights regarding the processing of personal data pursuant to Articles 15-22 of GDPR 2016/679. These rights include:

- a. Access: the data subject may obtain information in relation to the processing of his data and a copy of that data.
- b. Rectification: if the data subject considers that his or her data is inaccurate or incomplete, he or she may request that the data be amended accordingly.
- c. Deletion: the data subject may request the deletion of data if he/she revokes his/her previous consent and there is no other legal basis for processing or in other cases provided for by law.
- d. Limitation: in cases provided for by law (e.g. if he/she disputes the lawfulness of the processing or the accuracy of the data), the data subject may obtain the limitation of the processing of the data without its deletion.
- e. Objection: the data subject may object to the processing of the data if the processing is based on a legitimate interest of the Organiser for reasons relating to his or her particular situation, unless there are compelling reasons why the interests of the Organiser override his or her rights (this is the case, for example, where the processing is necessary to defend a right of the Organiser in court).
- f. Withdrawal of consent: the data subject may withdraw consent previously given for the purposes of processing.

The data subject may, at any time, object to the processing of his or her data for marketing purposes and revoke the consent previously given for that purpose, also by following the procedure and instructions set out in the text of each commercial communication.

The participant is aware that his or her objection (cf. item e above) or revocation of consent (cf. item 4 above) or authorisation (cf. Release) to the use of images depicting him or her will be effective to the extent that it is possible to stop the publication of such images by reasonable means and at reasonable cost. Opposition as well as revocation will not, however, invalidate the lawfulness of the uses that have taken place in the meantime.

These rights may be exercised by sending a written notice to the organiser at tracks6000@gmail.com.

In accordance with current legislation, in addition to the above rights, the data subject is also entitled to lodge a complaint with the Garante per la protezione dei dati personali, Piazza di Monte Citorio n. 121 - 00186, Rome, Fax: (+39) 06.69677.3785, protocollo@pec.gpdp.it

Scurelle, on _____

Signature for reading and acceptance (legible) _____