

PRIVACY POLICY

EU Regulation 679/2016 General Data Protection Regulation

Fondazione Penta ETS hereby wishes to inform visitors to the <https://team-coach.eu/> website (hereinafter the “**Website**”) of its personal data protection policy, emphasising its commitment and attention to protecting the privacy of Website visitors. Please read carefully our Privacy Policy, which applies if you access the Website and simply navigate it using our services.

Navigation within the Website is free and does not require registration, with the exception of certain areas in which you may freely and expressly provide a set of personal data to access certain services (e.g. to enroll in the e-learning platform). When we ask you to provide your personal data to access these additional services, we will always inform you in accordance with EU Regulation 679/2016 *General Data Protection Regulation* (the “**GDPR**”) about the purposes and methods of the use of the data as well as your right to request the deletion or updating of the data at any time.

In accordance with the GDPR, we are providing you with the following information:

1. The Data Controller

The Data controller is **Fondazione Penta ETS** with registered office at Corso Stati Uniti, 4 35127 Padova, Italy, e-mail address: legal@pentafoundation.org (hereinafter also “**Penta**”, the “**Organisation**” or the “**Data Controller**”).

2. The Data Protection Officer

The Data Protection Officer, appointed by Penta according to Article 37 of the GDPR, can be contacted at the following address: dpo@pentafoundation.org.

3. Types of Personal Data Processed

Registration is not required in order to access the Website. However, to access certain services you can provide your details (e.g. your personal data may be requested to register you for enrolling in the e-learning platform and access training courses). For further information, please read the privacy notice available in the [enrollment section](#) (“[Privacy Notice](#)”). With reference to the data related to the web browsing on the Website, please also read the following paragraph on the [Cookies](#) used by this Website.

4. Optional provision of personal data

The provision of personal data is generally optional. In certain cases only, the failure to provide personal data may make it impossible to obtain some services (eg. ECME credits and technical support). The data necessary are indicated in the collection form.

5. Purposes and legal basis for data processing

Data is collected and processed for purposes strictly related to the use of the Website and its services. The purposes of the processing are detailed in the specific privacy notice provided by the Website (GDPR – article 6, paragraph 1, letter b) or for certain types of cookies according to your consent (GDPR – article 6, paragraph 1, letter a) and b)). For details of the processing carried out through the cookies, please read the [Cookie Policy](#).

Further purposes of the processing are detailed in the specific privacy notice provided by the Website whenever there is a data collection.

6. Method, period of data processing and communication

Data may be processed in both electronic and paper form. Penta guarantees that the personal data provided through the Website will be processed lawfully and properly, in full compliance with applicable legislation, and that the data provided during registration will be kept strictly confidential. All information collected is transmitted through a secure connection to prevent interception by outsiders. We implement security measures to ensure the security of the Website.

Any data provided by users shall be processed for the period of time specified in the specific privacy notice provided at the time of the data collection.

The data shall not be disseminated and will be processed only by persons expressly authorized to the processing and identified within the Network Education and Training (NET) area of Penta.

Penta uses external providers to manage the Website and the Website’s services. Suppliers or external organizations process personal data for purposes strictly related to the provision of the services and have therefore been appointed by Penta as Data Processors (GDPR – article 28). A complete list of Data Processors can be requested at the e-mail address legal@pentafoundation.org.

7. Links to other websites

This information is provided only for the website <https://team-coach.eu/> and not for any other websites that may be assessed through a link. Penta cannot be held liable for personal data provided by users to external parties or any websites linked to this Website.

8. **Transmission of data outside the European Union**

Within the purposes listed above, personal data might be processed in countries not belonging to the European Union (“**Third Countries**”), such as Philippines. In the case of a transfer of Personal Data outside the European Union, Penta undertakes to comply with Chapter V of the GDPR on the transfer of data to Third Countries. The transfer of data shall be based on an adequacy decision of the European Commission (according to art. 45 of the GDPR) or on an appropriate safeguard (according to art. 46 of the GDPR). By simple request to be made to the e-mail address info@penta-id.org, you will be able to receive specific information on processor which process data outside the European Union.

9. **Rights of data subjects**

By contacting the following e-mail address: legal@pentafoundation.org you may at any time exercise the following rights (GDPR – article 15 to 22):

- *obtaining confirmation as to whether or not personal data concerning you is being processed*
- *obtaining access to your personal data and to the information set out in Article 15 of the GDPR;*
- *obtaining the rectification of the inaccurate personal data that concerns you without undue delay or the supplementing of incomplete personal data;*
- *obtaining the erasure of the personal data that concern you without undue delay;*
- *obtaining the restriction of processing the personal data that concern you;*
- *being informed of any rectifications or erasures or restrictions of processing in relation to the personal data that concern you;*
- *receiving in a structured, commonly used and machine-readable format the personal data that concern you;*
- *objecting at any time, on grounds associated with your specific situation, to the processing of the personal data that concern you.*

The full text of such rights is available on www.garanteprivacy.it.

10. **Lodge a complaint before the Data Protection Authority**

Should you consider the processing of your data infringes the GDPR, you may lodge a complaint before the Italian Data Protection Authority (www.garanteprivacy.it), or before the Data Protection Authority of the Member State of your habitual residence, place of work or place of the alleged infringement.

11. **Applicable law**

This Privacy Policy is ruled by GDPR, which guarantees that the processing of personal data is made in full respect of fundamental rights and freedom, as well as of the dignity of the person involved with particular reference to privacy, personal identity and the right to personal data protection.

12. **Revision clause**

Penta reserves the right to revise, amend or simply update this Privacy Policy, in whole or in part, at its sole discretion, in any manner and/or at any time, without notice, including to take account of changes to the law or regulations regarding the protection of personal data. Users will be notified of changes and updates to the Privacy Policy by publication on the homepage of the Website. Any modification will be binding as soon as published or communicated. Please access this section regularly for updates on the Privacy Policy or check your e-mail.

* * *

For more information about the processing of your data through the Website, please read the [Cookie Policy](#).

Padova, Italy, April 2024