

## PRIVACY POLICY

**REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).**

### 1) Scope

The International Union of Superiors General (hereafter, "UISG") - through this privacy and data processing policy (hereafter, "Policy") - intends to illustrate how the acquisition and processing of personal and particular data is regulated, i.e., those referred to in articles 6 and 9 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (from now on "GDPR") in the field of institutional activities.

The processing of personal and particular data, pursuant articles 6 and 9 of the GDPR Regulation, takes place according to the provisions established in the GDPR Regulation and the previously approved n. 3 of 2016 containing "prescriptions relating to the treatment of particular categories of data by associations, foundations, churches and associations or religious communities."

The UISG is authorized to process the data referenced in article 6 (below "Personal Data") and referenced in article 9 (below "Special Data") of the GDPR Regulation (all jointly referred to as "Data") relating to:

- a) members, associates, and, if strictly indispensable for the pursuit of its purposes, to their family members and cohabitants;
- b) members, supporters or underwriters, as well as individuals who apply for admission or membership or who have regular contact with membership organizations, foundations, churches and associations or religious communities;
- c) beneficiaries, carers and users of the activities or services provided by UISG or membership agencies, foundations, churches and associations or religious communities, which can be identified by statute;
- d) students enrolled, learners, and teachers of courses, seminars and webinars;

for the pursuit of specific and legitimate purposes identified by the Charter or Statute and for the pursuit of charitable and social assistance purposes.

UISG, in accordance with Article 5 of GDPR, will acquire and treat the data collected in accordance with the criteria and principles of transparency, legality and fairness, minimization, relevance and proportionality, limitation of conservation, safety and integrity.

## 2) DATA COLLECTION

UISG implements the principle of **minimization of data collection**.

UISG considers **personal data**, recalling what has already been clarified by the Personal Data Protection Guarantor, information that identifies or makes an individual identifiable and that can provide details about his/her characteristics, habits, lifestyle, personal relationships, state of health, economic situation, etc.

In addition, UISG considers particular data: (i) data that can reveal racial and ethnic origin, religious, philosophical or other beliefs, political views, membership of parties, trade unions, associations or organisations of religious, philosophical, political or trade union nature, health status and sex life; (ii) judicial data: those that may reveal the existence of certain judicial measures subject to registration in the criminal record (e.g. final criminal sentencing measures, conditional release, refusal or obligation of residence permit, alternative measures to detention) or the quality of a defendant or suspect. **It is clarified that judicial data will NOT be processed by UISG.**

The data required for the **Membership** in UISG is acquired directly by the concerned person on the basis of the forms required for membership.

The data requested from **individuals holding social/corporate or honorific roles** is directly acquired by the concerned person and/or the Congregation to which he/she belongs.

The data required through **Electronic Communication**, particularly during courses, seminars or webinars will be treated as follows:

1. UISG has a message on its platforms that refers to the policy;
2. UISG will require from the concerned person the consent in oral form, since there is no alternative way to interact with the person who agrees to participate in seminars or webinars;
3. UISG communicates in oral form to the concerned person the reason for the request for the data;
4. UISG will send the policy to the e-mail indicated by the concerned person.

In the case of data collection during the course of **SEMINARS and WEBINARS**, UISG believes that the the treatment and possible data dissemination for the purposes of publicizing the activities of UISG (i.e. publishing the webinar on the youtube channel) should be the subject of express and informed consent by the concerned person.

In the case of communication relating to the **raising of FUNDS AND DONATIONS**, UISG considers that access by the Interested Party to the purpose of the donation is a voluntary act which is specifically pre-finalized by the Interested, which is why the request of consent to the donation and data processing necessary for legal purposes is not needed; UISG will send the policy to the e-mail indicated by the Interested Party.

Any other request (by way of of example, but not limited to: the sending of **BULLETINS, NEWSLETTERS** or other material related to the UISG mission) must be subject to specific approval by the Interested Party, which will be followed by the submission of the policy.

### **3) DATA COMUNICACION AND PUBLICATION**

The treatment of the Special Data is carried out for the pursuit of the purposes determined by the statute, and in particular for the pursuit of cultural, religious, educational purposes also with regard to religious teaching, training, charity, social care or social health care.

The processing of these data may also take place in order to enforce or defend a right even by a third party in court, as well as in administrative proceedings or in cases under EU law, community laws, legislation, regulations or collective contracts.

For the above purposes, the processing of the above data may also relate to the keeping of records and financial accounts, lists, directories and other documents necessary for the administrative management of membership bodies and organizations, foundations, churches and associations or religious communities, as well as for the fulfillment of tax obligations or for the dissemination of magazines, bulletins and the like.

The data collected in the abovementioned way will be retained by UISG and may be processed by UISG employees and collaborators, who are responsible for carrying out specific operations necessary to pursue these purposes, under the direct UISG's authority and responsibilities and in accordance with the instructions that will be issued by the same.

UISG may disclose personal data acquired to external entities and companies that provide closely related and instrumental services to its business, such as: banks responsible for paying fees; employment counselor, legal assistance for the Prevention and Protection Service (DLgs 81/ 2008; real estate management, website management. UISG, at the request of the person concerned, will provide the list of external parties to which the data is transmitted.

The data collected by UISG during **COURSES, SEMINARS, AND WEBINARS** can be disclosed for training purposes and to promote UISG's activity, subject to the consent of the Interested, through Social Media or UISG websites.

UISG is present, with its own account, on the following Social Media:

- Facebook (@UISGInternationalUnionSuperiorsGeneral)
- Twitter (@UISGRoma)
- Instagram (@uisg\_superiorsgeneral)
- Youtube (UISG)
- Flickr (UISG Unione Superiore Generali)
- Linkedin (InternationalUnioneSuperiorsGeneral)

The following websites are related to UISG:

- <http://www.internationalunionsuperiorsgeneral.org/it/>
- [www.talithakum.info](http://www.talithakum.info) (include la piattaforma di crowdfunding Patrimon)
- <https://www.sowinghopefortheplanet.org>
- <https://preghieracontrotratta.org>

#### 4) THE OWNER OF THE DATA TREATMENT

is UISG, based in Piazza di Ponte Sant'Angelo, 28 – 00186 Rome, C.F. 80074610587.

#### 5) EXERCISE OF RIGHTS BY THE DATA SUBJECT

UISG recognizes and is prepared for each interested party to exercise their right to **access** data (art. 15 GDPR), **data adjustment** (art. 16 GDPR), right of **cancellation** (right to oblivion, art. 17 GDPR), the **restriction of processing** (art. 18 GDPR), right to **data transferability** (art. 20 GDPR), right of **objection** (art. 21 GDPR) by contacting the **Data Processing Manager Patrizia Morgante**

- al numero telefonico +39 349 935 87 44 – 06 68 400 234
- all'indirizzo e-mail [comunicazione@uisg.org](mailto:comunicazione@uisg.org)
- all'indirizzo PEC [uisg@legalmail.it](mailto:uisg@legalmail.it)

**The collected data will be retained for a period of 10 years from the termination of the relationship with UISG.**

## **6) PERSONAL DATA PROTECTION**

UISG protects personal data by taking technical and administrative security measures to reduce the risk of loss, incorrect use, unauthorized access, disclosure, and data tampering. Security systems used include firewalls, physical access controls to our archives, and controls for authorizing access to personal data.

## **7) HOW DATA IS BEING USED**

1. The data collected is NOT used by the UISG Owner or third parties to make decisions that have legal effects;
2. The data collected is NOT used by the UISG Owner or third parties for decisions that may prevent those affected from using a service;
3. The data collected is NOT used by the UISG Owner or third parties for the scoring, evaluation or profiling of the interested parties;
4. The collected data is NOT used by the UISG Owner or third parties for profiling, combining and comparing data sets from different sources;
5. The collected data is NOT subject to systematic monitoring (video surveillance);
6. The UISG Owner does NOT deal with large-scale personal data;
7. The UISG Owner does NOT use advanced technological solutions such as the internet of things, facial recognition or the like;
8. The UISG Owner does NOT systematically monitor the activities of employees, including the use of computer terminals, internet browsing, etc.

## **8) USE OF DATA ALREADY AVAILABLE AS OF MAY 24, 2018**

UISG will maintain among its data the directory already acquired for its institutional purposes and acquired in accordance with the DLgs 196/2003.

UISG on the first contact with the names already on file will attach the policy.