



**DISCLOSURE TO NATURAL PERSONS PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU)  
2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016  
(HEREINAFTER THE "DISCLOSURE")**

**SECTION 1 – IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER**

The Cassa di Risparmio di Cuneo Foundation, with registered office at 17, Via Roma – 12100 Cuneo, Tax Code 96031120049, is the Data Controller and processes your personal data (hereinafter the "Personal Data") for the purposes indicated in Section 2.

The Data Protection Officer (DPO) is the lawyer Luisa Di Giacomo, who can be contacted at the email address [dpo@fondazionecrc.it](mailto:dpo@fondazionecrc.it), with office in Turin, at 76 corso Vittorio Emanuele II.

**SECTION 2 – CATEGORIES OF PERSONAL DATA, PURPOSES, LEGAL BASIS OF THE PROCESSING, MANDATORY OR OPTIONAL NATURE OF THE PROCESSING****Categories of Personal Data**

The Personal Data processed by the Data Controller include personal details (first name, surname, tax code), your contact details (address, email, telephone number), data acquired from payment instructions, and invoicing data.

**Purpose and legal basis of processing**

The Personal Data concerning you are processed by the Data Controller in the context of its activity for the following purposes:

**a) Provision of services and performance of contracts**

The provision of your Personal Data necessary to provide the services requested and execute the contracts (including the acts in the pre-contractual phase) is not mandatory, but the refusal to provide such Personal Data makes it impossible for the Data Controller to fulfil the request.

The legal basis for the processing of your personal data is Article 6.1.b of the Regulation.

**b) Compliance with requirements of national and EU legislation**

The processing of your Personal Data to comply with regulatory requirements is mandatory and your consent is not required.

Processing is mandatory, for example, when required by anti-money laundering, tax legislation, or to comply with provisions or requests from the supervisory and control authority.

The legal basis for the processing of your personal data is Article 6.1.c of the Regulation.

**SECTION 3 – CATEGORIES OF RECIPIENTS TO WHOM PERSONAL DATA MAY BE DISCLOSED –****DISSEMINATION OF DATA**

In order to achieve the purposes indicated above, it may be necessary for the Data Controller to communicate your Personal Data to the following categories of recipients:

1) Third parties (companies, freelancers) who process your Personal Data in the context of the activities carried out by the Data Controller, such as, for example, collaborators, consultants, associated companies, accountants and companies that deal with the preparation of the financial statements, auditors and supervisory bodies.

2) Authorities (for example, judicial or administrative).

The third parties to whom your Personal Data may be disclosed act as: 1) Data Controllers, i.e. entities that determine the purposes and means of processing Personal Data; 2) Data Processors, i.e. entities that process Personal Data on behalf of the Data Controller or 3) Joint Data Controllers who jointly determine the purposes and means of the Data Controller.

Your Personal Data will not be disseminated.

**SECTION 4 – METHODS OF PROCESSING AND STORAGE OF PERSONAL DATA**

In relation to the aforementioned purposes, the processing is carried out using manual, computerised and telematic tools with logic strictly related to the aforementioned purposes and, in any case, in such a way as to guarantee the security and confidentiality of the Data and with your commitment to promptly notify us of any corrections, modifications and updates.

None of your Personal Data processed by the Data Controller is compatible with the definition of "Special categories of data" in art. 9 of EU Regulation 2016/679. If data of this kind are transmitted to us, in the absence of your explicit written consent, we will delete them immediately.

Your Personal Data are kept for a period of time not exceeding that necessary to achieve the purposes for which they are processed, without prejudice to the retention periods provided for by law. In particular, your Personal Data are generally kept for a period of ten years from the termination of the contractual relationship of which you are a party. Personal Data may also be processed for a longer period of time if there is an interruption and/or suspension of the limitation period that justifies the extension of the data storage.

**SECTION 5 – TRANSFER OF DATA ABROAD**

None of your Personal Data is transferred outside the European Union.

The Data Controller ensures that the electronic processing of your Personal Data by the Recipients is carried out in compliance with the Applicable Regulations.

Should transfers occur outside the European Economic Area, such transfers will be based either on an adequacy decision or on the Standard Model Clauses approved by the European Commission.

## **SECTION 6 – RIGHTS OF THE DATA SUBJECT**

As a Data Subject, you may exercise, at any time, the rights provided for by the Regulation listed below, by sending a specific request in writing to the email address [info@fondazionecrc.it](mailto:info@fondazionecrc.it).

Any communications and actions taken by the Data Controller, in response to the exercise of the rights listed below, will be carried out free of charge. However, if your requests are manifestly unfounded or excessive, in particular due to their repetitive nature, the Data Controller may charge you a fee, taking into account the administrative costs incurred, or refuse to comply with your requests.

### **1. Right to access**

You can obtain from the Data Controller confirmation as to whether the processing of Personal Data is or is not in progress and, where this is the case, obtain access to the Personal Data and information provided for by art. 15 of the Regulation, including, by way of example: the purposes of the processing, the categories of Personal Data processed, etc.

Where Personal Data is transferred to a non-EU country or to an international organisation, you shall also have the right to be informed of the appropriate safeguards relating to the transfer.

If requested, the Data Controller may provide you with a copy of the Personal Data being processed. For any additional copies, the Data Controller may charge a reasonable fee based on administrative costs. If the request in question is submitted by electronic means, and unless otherwise indicated, the information will be provided by the Data Controller in a commonly used electronic format.

### **2. Right to rectification**

You can obtain from the Data Controller the rectification of your Personal Data that are inaccurate as well as, taking into account the purposes of the processing, the integration of the same, if they are incomplete, by providing a supplementary declaration.

### **3. Right to deletion**

You can obtain from the Data Controller the deletion of your Personal Data, if one of the reasons provided for by art. 17 of the Regulation are present, including, by way of example, if the Personal Data are no longer necessary with respect to the purposes for which they were collected or otherwise processed or if the consent on which the processing of your Personal Data is based has been revoked by you and there is no other legal basis for the processing.

We inform you that the Data Controller will not be able to proceed with the deletion of your Personal Data if their processing is necessary, for example, for the fulfilment of a legal obligation, for reasons of public interest, or for the ascertainment, exercise or defence of a right in court.

#### **4. Right to restrict processing**

You may obtain the restriction of the processing of your Personal Data if one of the hypotheses provided for by art. 18 of the Regulation occurs, including, for example: in the face of a dispute about the accuracy of the Personal Data being processed or if the Personal Data are necessary for the ascertainment, exercise or defence of a right in court, although the Data Controller no longer needs them for the purposes of processing.

#### **5. Right to data portability**

If the processing of your Personal Data is based on consent or is necessary for the execution of a contract or pre-contractual measures and the processing is carried out by automated means, you may request to receive the Personal Data provided by you in a structured, commonly used and machine-readable format (e.g. computer and/or tablet) and transmit the Personal Data received to another Data Controller without hindrance from the Data Controller.

You may also request that your Personal Data be transmitted by the Data Controller directly to another data controller indicated by you, if this is technically feasible for the Data Controller. In this case, it will be your responsibility to provide all the exact details of the new data controller to whom you intend to transfer your Personal Data, providing us with written authorisation.

#### **6. Right to object**

You may object at any time to the processing of Personal Data if the processing is carried out for the performance of a task carried out in the public interest or is necessary for the purposes of the legitimate interest of the Data Controller (including profiling).

If You decide to exercise your right to object described herein, the Data Controller will refrain from further processing of your personal data, unless there are legitimate grounds to continue such processing (reasons overriding the interests, rights and freedoms of the data subject), or such processing is necessary for the establishment, exercise or defence of a right in court of law.

#### **7. Right to lodge a complaint with the Italian Data Protection Authority**

Notwithstanding your right to appeal to any other administrative or jurisdictional court, should you deem that the processing of your Personal Data takes place in breach of the Regulation and/or the applicable regulations, you may lodge a complaint with the Italian Data Protection Authority.

More information can be obtained by contacting the DPO at the address indicated above.