

**DISCLOSURE TO NATURAL PERSONS PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679
(GDPR) AND CONSENT FORM FOR THE USE OF IMAGES**

Fondazione Cassa di Risparmio di Cuneo (abbreviated as "Fondazione CRC"), in the person of its *pro tempore* legal representative, with **registered office in CUNEO (CN) (12100), Via Roma 17, Tax Code 96031120049**, as Data Controller, informs the data subjects that during public events or events open to the public organised by it, audio and video recordings may be made and photographs of the participants may be taken and that the materials thus created may be disseminated through the Data Controller's websites and/or social media channels managed by the Data Controller, and/or by the press and TV or other media. This collection of images and videos will be carried out with respect for the dignity of the people present and the collection and subsequent dissemination of images of minors will be avoided, as far as the Data Controller is concerned.

When the number of people present at the event is very high, this makes it impossible for the Data Controller to collect individual releases and authorisations for the dissemination of the images. Therefore, this disclosure, attached to the event invitations and published on the Data Controller's website, has the purpose of providing data subjects with all the information required by art. 13 of EU Reg. EU 679/2016. Where possible, and consistent with the organisation of the event, the same will be organised by providing and communicating in advance areas and/or times when the collection of images and/or videos is not expected. In this way, we want to safeguard those who, while wishing to participate in the event, do not want their image to be collected and possibly and subsequently disseminated.

By participating in the event after having read this document, the data subjects authorise the Data Controller:

- to create, including through third parties appointed by it, photographs, videos or other audiovisual materials containing their image, name, voice and/or personal statements and comments (hereinafter, the "Materials");
- to use and/or disseminate and/or publish the Materials, including through appointed third parties, without having anything to claim in terms of compensation or rights, on all the Data Controller's communication channels, including: websites, social media channels, video platforms, as well as outside the organisation for the publication of articles in newspapers, including online ones, in order to document the results of the Initiative.

They acknowledge that the Materials are to be considered the exclusive property of the Data Controller from the outset, and that consequently they will not be submitted to the data subjects for prior approval and may be subjected to additions, cuts, modifications, montages (including possibly with materials related to other promotional initiatives), and reworkings, including of a technical nature.

They declare and guarantee:

- that they have not granted third parties rights directly or indirectly conflicting with the above, and consequently exonerate from any liability and expressly indemnify the Data Controller and the third parties in charge (such as, by way of example and not limited to, communication agencies, production companies) from any claim, complaint, demand, request for damages and in general from any dispute (including judicial) that may be brought by any third party in this regard;
- that they have nothing to claim from the Data Controller in relation to participation in the event and the use of their name/surname, personal data, voice and/or personal image within the Materials.
- that they are aware that personal data will be processed in compliance with EU Regulation no. 2016/679 ("GDPR") and any other applicable legislation regarding the protection of personal data, as well as in accordance with the provisions of the Information on the processing of personal data attached hereto.

Finally, they declare and acknowledge that the press and television may be present at the event and that, therefore, news and television reports may be made with the relative dissemination of images in newspapers, including online and on television.

DATA CONTROLLER AND DPO

CASSA DI RISPARMIO DI CUNEO FOUNDATION – 17, Via Roma – 12100 –
Cuneo

Fondazione Cassa di Risparmio di Cuneo (abbreviated as "Fondazione CRC"), in the person of its *pro tempore* legal representative, with registered office in CUNEO (CN) (12100), Via Roma 17, Tax Code 96031120049, as Data Controller (hereinafter referred to as the Data Controller) hereby informs the data subjects about the processing

of Personal Data provided during initiatives, events, and demonstrations held in public places or places open to the public where the press and TV are also present.

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

CATEGORIES OF PERSONAL DATA, PURPOSES AND LEGAL BASIS OF THE PROCESSING

The Data Controller will process personal data, such as personal details, photos, video and audio images, (hereinafter "Personal Data"), during initiatives, events, and demonstrations held in public places or places open to the public where the press and TV are also present. For the purposes of this disclosure, the processing of Personal Data is understood to be any operation or set of operations, carried out also with the help of automated processes and applied to personal data, in accordance with the provisions of current legislation on the protection of personal data.

The Data Controller will process Personal Data exclusively for the purposes related to the initiatives or events organised from time to time and the activities related to it.

For this purpose, Personal Data may be published on all of the Data Controller's communication channels, on social media channels, on video platforms, as well as outside the organisation for the publication of articles in newspapers, including online ones, or for television reports.

The legal basis for the processing is the data subjects' free, informed and revocable consent, expressed through voluntary participation in the organised event. Participation in the event as an expression of consent also implies acceptance of the provision of data as mandatory.

If the premises are subject to video surveillance for security reasons, this will be made known with a specific notice, available before access to the premises or the area in which the event will take place.

The Data Controller guarantees that all the photo, video and audio materials referred to in this disclosure will not contain violations of laws, regulations or rights of third parties, will not be used for purposes other than those indicated here and will not affect the personal dignity and decorum of the people portrayed in any way.

CATEGORIES OF RECIPIENTS TO WHOM YOUR PERSONAL DATA MAY BE DISCLOSED

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

- 1) Companies that perform services for the Data Controller, including the company that manages the information system and certain administrative, legal and accounting services.
- 2) Third parties (companies, freelancers, etc.), IT and/or administrative service providers, appointed as data processors, for example production companies that will produce the Materials, as external data processors.
- 3) Authorities (for example, judicial, administrative, etc.) and public information systems established at public administrations.

The Data Controller and 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.

DISSEMINATION OF DATA

Personal data will be subject to dissemination through publication on the means that the Data Controller deems appropriate (by way of example and not limited to, websites directly or indirectly attributable to the Data Controller, official profiles of the Data Controller on social media such as Facebook, Instagram or Twitter, paper materials for posting and printing, digital and satellite TV, radio), or through publication in newspapers and/or television and/or radio of operators present at the event and/or invited by the Data Controller to participate in the event and/or interested in giving relevance to the event on their own channels.

TRANSFERRING PERSONAL DATA TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANISATION OUTSIDE THE EUROPEAN UNION.

Personal Data are processed by the Data Controller within the territory of the European Union and will be subject to dissemination as specified above.

The Data Controller guarantees that, without prejudice to the dissemination, within the limits and in the manner set out in this document, the transfer of data outside the European Union and their dissemination will take place to countries for which there are "adequacy" decisions by the European Commission, or on the basis of adequate guarantees or specific exceptions provided for by the GDPR.

PROCESSING METHODS AND RETENTION PERIODS OF PERSONAL DATA

Personal data will be processed with automated tools and not in compliance with the principle of necessity and proportionality, avoiding the processing of personal data if the operations can be carried out through the use of anonymous data or through other methods. The Data Controller shall take all appropriate technical and organisational measures to ensure and to be able to demonstrate that processing is carried out in accordance with the principles of the GDPR and to prevent the loss of personal data, unlawful or incorrect use thereof and unauthorised access.

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.

Without prejudice to what is already present on the materials and/or publications as products for the purpose and disseminated through the provided channels, Personal Data will be automatically deleted after five years and will not, therefore, be used by the Data Controller in new materials and/or publications produced and disseminated after that date, it being understood that the materials already published could remain as an archive on the Data Controller's web and social pages and in the press and TV archives.

RIGHTS OF DATA SUBJECTS**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 are transferred to a third country or to an international organisation, the data subject shall 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 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 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 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 Personal Data: if their processing is necessary, for example, for the fulfilment of a legal obligation, for reasons of public interest, or for the establishment, exercise or defence of a right in court.

4. Right to restrict processing

You may obtain the limitation of the processing of 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 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 can:

- request to receive the Personal Data you provide in a structured format, commonly used and read by automatic devices (e.g. computers and/or tablets);
- transmit the Personal Data received to another Data Controller without any hindrance from the Data Controller.

You may also request that the 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 execution of an activity of public interest or for the pursuit of a legitimate interest of the Data Controller (including profiling).

If you decide to exercise the right to object described herein, the Data Controller shall refrain from further processing of personal data, unless there are legitimate reasons to proceed with the processing (overriding reasons relative to the interests, rights and freedoms of the data subject), or the processing is necessary for the ascertainment, exercise or defence of a right in court.

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 Controller carries out is in breach of the Regulation and/or the applicable regulations, you may lodge a complaint with the Italian Data Protection Authority.

To exercise your rights, you may contact the Data Controller or the DPO, specifying the nature of your request and to which data it refers.