

REPORT ON THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH ART. 13 AND FOLLOWING OF THE E.U. REGULATION N. 2016/679 - GDPR

Dear User,

with this document Welcome Association Italy - W.A.I. (hereinafter also referred to as "WAI"), an association that is not recognized, pursuant to articles 36 and following of the Italian Civil Code, as Data Controller of your Personal Data, intends to provide you with the Report required by articles 13 and following of the European Regulation n. 2016/679 (hereinafter also referred to as "the Regulation" or GDPR), which regulates the protection of individuals with regard to the Processing of Personal Data, in order to explain to you how your Data are handled, provided by this procedure which is then finalized to the association by you to W.A.I. and stored, after the completion of the acquisition as W.A.I. "Member", for the entire duration of the relationship with W.A.I. and for the following period, as specified in the point entitled "Storage of personal data", contained in this document.

Article. 12 ("Information, communications and transparent methods for the exercise of the rights of the interested party"), n. 1, of the EU Regulation n. 2016/679, establishes that the Data Controller adopts appropriate measures to provide the interested party with all the information referred to in articles 13 and 14 and the communications referred to in articles 15 to 22 and article 34 relating to the processing of data in a concise, transparent, intelligible and easily accessible form, with simple and clear language.

Therefore we first inform you that W.A.I. : will process your data in a lawful, correct and transparent manner (Article 5, No. 1, letter a) Reg. 2016/679); will treat them for specific, explicit and legitimate purposes (Article 5, No. 1, letter b) Reg. 2016/679); Your Personal Data, subject to processing, will be accurate and, if necessary, updated, and that all reasonable measures will be taken to promptly cancel or correct inaccurate data with respect to the purposes for which they are processed (Article 5, No. 1, letter d); will process your data in such a way as to ensure adequate security of Personal Data, including protection, through appropriate physical, technical and organizational measures, from unauthorized or unlawful processing and from accidental loss, destruction or damage (art. 5, n 1, letter f) and in any case in compliance with the general provisions of art. 5 ("Principles applicable to the processing of personal data") of the Regulation n. 2016/679.



1. COLLECTION OF PERSONAL DATA MODALITY AND NECESSITY OF PROCESSING

According to art. 6 ("Lawfulness of processing") of the Regulation states that the processing of Personal Data collected during the online "registration" procedure takes place on a voluntary basis and is necessary and obligatory for the acquisition of the qualification procedure WAI "Member" (in particular pursuant to Article 6, paragraph 1, letter b).

2. SOURCE OF PERSONAL DATA

The Personal Data of which W.A.I. will come into possession are provided directly by the interested party at the time of filling out the appropriate online form referred to in the preceding point, accessible from the website www.waitaly.net, or at the ACT of filling out a similar paper/digital form at one of the WAI offices present in Italy, where the interested party has personally gone to join W.A.I. in order to adhere to its statutory purposes and make use of the services and agreements.

3. CONTROLLER AND SUBJECTS RESPONSABLE

The controller of your personal data is the Association, Welcome Association Italy - W.A.I., with registered offices at 00185 - Rome, Via dei Marsi n ° 31.

W.A.I. has also identified, pursuant to and in compliance with Regulation 2016/679 and, where necessary, appointed Data Processors, pursuant to art. 28 of the same, subjects and/or companies that, in the context of respective functions which have been performed, carry out the processing of personal data on behalf and/or in the interest of the Association.

The list of subjects who are responsible is constantly updated and can be requested from the Owner by sending a communication to the following e-mail address of the Data Protection Officer (DPO - Data Protection Officer): privacy@waitaly.net

4. OBJECTIVE OF THE PROCESSING AND ITS LEGAL BASIS

Personal Data will be processed in compliance with the law in force (EU Regulation No. 2016/679 and Legislative Decree No. 196 of 2003 and its amendments and additions) for the performance of the services requested by the interested party-member, for the achievement of the purposes indicated in the Statute of the WAI Association (available on the homepage of the website www.waitaly.net or in detail by clicking on the following link: www.waitaly.net/chi-siamo/), and with reference to all the requirements deriving from this and to the consequent fulfillment of legal and



tax obligations , insurance and, indeed, statutory.

The legal basis of the processing of Personal Data lies precisely in the fact that it is necessary that each Member, by reason of what is expressed in the preceding period, provide their data at the time of their request to be associated with W.A.I. With reference to the aforementioned statutory, legal, tax and insurance obligations, personal data will therefore be processed for the following purposes:

- a) to fulfill obligations provided for by internal laws and regulations of the Italian State as well as by European, general and specific legislation;
- b) to fulfill the obligations provided for by the law, as well as by the instructions given by the Control Authorities legitimated by the law;
- c) to proceed with the registration and enrollment as a WAI member (or Partner if you prefer), including in this the attestation and verification of payment and collection of membership fees, of various fees provided for by the statutory provisions for obtaining additional services which have been chosen by the member, among those provided directly by the Association or by subjects which have agreements with the Association;
- d) for purposes strictly connected and instrumental to the management of relations between the association and the members, such as, by way of example only: convening of ordinary and extraordinary partners' meetings or meetings of the Board of Directors, administrative purposes, provision of assistance and support services, subscription to the newsletter(s) for the promotion of initiatives aimed at providing assistance and services to foreign citizens residing or staying in Italy, sending of informative communications on agreements that the Association has activated and will activate in favor of the Members;
- e) to achieve common institutional statutory activities;
- f) for organization of activities aimed at promoting and disseminating any information useful to the permanence of the members in the Italian territory;
- g) for purposes related to events organized by W.A.I., purposes with the aim of promoting and encouraging the knowledge and enhancement of cultural, social, economic, recreational, sporting and artistic expressions of foreigners residing or staying in Italy.

Further purposes may be expected and indicated to the members by reason of specific services that they will use starting from the dedicated pages available on the W.A.I. website and they can give rise to profiling activities, based on interests which have been expressed by members so as to be able to inform them about the agreements that the Association has activated in their favor.

The processing of data, as better specified in the following points, will result in



personal data being seen by W.A.I. employees and collaborators (INDIVIDUALS AUTHORIZED FOR THE PROCESSING), previously and duly instructed by W.A.I. about the cautions and guarantees to be observed in the processing of the data in question, as well as from third parties who provide ancillary and/or instrumental services to the activity of W.A.I. and with whom W.A.I. has signed specific agreements (INDIVIDUALS RESPONSIBLE FOR THE PROCESSING), also containing the obligation, on their part, to comply with the provisions of current legislation on the lawfulness and correctness of the processing of personal data, represented by the aforementioned European Regulation no. 679 of 2016 and by legislative decree n. 101 of 2018, amendment of Legislative Decree no. 196 of 2003 (Code regarding the protection of personal data).

5. PROCESSING MODALITY

The processing of personal data which has been provided will be in compliance with the aforementioned legislation in force. It will be carried out with the aid of electronic, computerized and telematic tools, as well as through paper supports, according to the principles of correctness, lawfulness, transparency, with logic strictly related to the purposes indicated and suitable for safeguarding the confidentiality of the data to be protected and rights of the data subject in compliance with the provisions of current legislation. In order to protect data from destruction or loss, even accidental, and against access or disclosure of unauthorized data, W.A.I. adopts, through the Data Controller and Data Processors, physical, technical and organizational security measures to guarantee an adequate level of security to the risk, which takes into account state of the art and costs of implementation, as well as of nature, object, context and purpose of the processing, as well as the risk of various probabilities and seriousness for rights and freedoms of natural persons, as provided, in particular, by art. 32 ("Security of processing") of EU Regulation no. 2016/679.

6. INDIVIDUALS TO WHOM PERSONAL DATA MAY BE COMMUNICATED TO

Within the limits and for the purposes of the WAI statutory treatment, personal data of members which have been collected following the completion of the relationship with WAI, will be communicated to companies, affiliated institutions/partners and market operators, who can directly provide services in favor of members. More specifically, personal data will be communicated to:

- subjects who can access them under the provisions of law, regulation or European legislation, within the limits set by these rules;
- individuals in charge of the processing in various capacities referred to in article 3



who need to access personal data for auxiliary and/or instrumental purposes to the relationship, within the limits strictly necessary for the performance of such tasks and always subject to the signing by them of a specific assignment letter from WAI (for example, external service providers, such as labor consultants, lawyers, accountants, website management and maintenance companies);

- subjects expressly authorized, within W.A.I., to the processing of data after signing a letter of appointment containing the instructions necessary for the correct and lawful processing of the data, with the imposition of duties of confidentiality and security; the updated list of the subjects authorized to use the data is available from the Data Controller and can be consulted by sending an e-mail to the e-mail address privacy@waitaly.net;

- external "collaborators" who need to access personal data for purposes related to the correct execution of relationships they have activated or will activate with W.A.I. (by way of example but not limited to, credit institutions, insurance companies, health facilities, service companies). These subjects operate in total autonomy with respect to W.A.I. as Autonomous Controller of the processing of personal data by virtue of this information and the consent given during the completion of the relationship; if said subjects intend to carry out treatments having purposes other than strictly statutory, they must obtain an independent, explicit consent from the member, preceded by appropriate information pursuant to art. 13 et seq. of EU Regulation n. 2016/679.

Failure to provide consent to the communication and processing of personal data to these subjects will make it impossible to establish or continue the relationship and to obtain the services that can be provided as a result of acquiring the quality of W.A.I. Member.

Personal data may also be processed by the administrative staff of W.A.I., subject to authorization and appropriate instruction regarding the need for data protection and security. We also inform you that the data of the members and the information relating to their activities, are stored on servers located in the European Union and that they can be communicated, with suitable procedures to ensure their protection and security, also to external software service providers, operating also outside the EU countries.

7. OBLIGATORY NATURE OF PROVIDING PERSONAL DATA AND CONSENT TO COMMUNICATION TO THIRD PARTIES

The provision of "common" personal data (records) and consent to their communication to third parties indicated in art. 6 are necessary for the purposes of processing described in this statement and are equally necessary to allow the



correct execution of the statutory activities by W.A.I. in favor of its members. This obligatory provision allows the members to obtain services provided by third parties with whom W.A.I. has stipulated and will stipulate agreements/affiliations aimed at this (by way of example and not limited to credit institutes, insurance companies, health facilities, legal services providers and consultants in general, training institutions etc.).

Any refusal to provide such personal data or to give consent for the processing of the same for these purposes will make it impossible to obtain the status of W.A.I. member.

8. SENSITIVE DATA AND CONSENT PERFORMANCE TO THE PROCESSING

Given that WAI, as indicated in the preceding point, acquires and performs the mandatory processing of personal data only as per the preceding point and only for statutory purposes, should it happen that, following the communication of the member (and therefore with their consent), WAI collects "sensitive data" of the members referred to in art. 9 EU Regulation n. 2016/679, and in particular sensitive data pursuant to art. 4.15 of the EU Regulation n. 2016/679 ("data regarding health condition"), W.A.I. is committed to not communicate and/or disseminate such data to any third party, as well as to ensure its timely destruction as soon as its activity as a mere assistance to the member is exhausted, in any case obliging itself, until the destruction of the data, to guarantee its protection and security by adopting technical and organizational measures pursuant to art. 32 of the EU Regulation n. 2016/679.

9. DURATION OF CONSERVATION

Personal data of members are kept, in a way that allows identification of interested parties, for a period of time not exceeding the achievement of the purposes for which they are treated and in any case at least for the entire duration of the relationship and, in the case of termination, for whatever reason, of the relationship, for the duration of the 10-year term pursuant to art. 2220 of the civil code ("Conservation of accounting entries").

10. RIGHTS OF THE INTERESTED PARTY

Given that the "INTERESTED PARTY", pursuant to EU Regulation no. 2016/679 is the natural person to whom the data being processed refer to, the same Regulation assigns, in particular pursuant to articles 13, paragraph, 2, letters b) and d), 15 and subsequent ones, specific rights attributed to the interested party regarding their



own data, which must be illustrated to them in a concise, transparent and clear and simple language.

Each member - precisely "interested party" - can exercise the following rights with W.A.I. at any time:

- obtain, from the Data Controller, confirmation that processing of personal data concerning them is in progress and, in this case, request access to them and the following information:

- a) purposes of the processing;

- b) categories of personal data at issue;

- c) recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if they are recipients of third countries or international organizations;

- d) when possible, the period of storage of personal data provided, or, if this is not possible, standards used to determine this period;

- e) the existence of the interested party's right to request the data Controller to rectify or cancel personal data or limit the processing of personal data concerning them or to oppose their processing;

- f) the right to lodge a complaint with a supervisory authority, represented, in Italy, by the Guarantor for the protection of personal data (Privacy Guarantor);

- g) the existence of an automated decision-making process, including profiling pursuant to art. 22, paragraphs 1 and 4, of Regulation n. 679/2016 and, at least in such cases, significant information on logic used, as well as the importance and the consequences expected by such treatment for the interested party;

- to obtain from the Data Controller, correction of inaccurate personal data concerning them without unjustified delay and, taking into account the purposes of the processing, also to obtain the integration of incomplete personal data, also by providing a supplementary declaration;

- obtain from the Data Controller the deletion of personal data concerning them without unjustified delay, with the consequent obligation of said Controller to delete personal data: if these are no longer necessary with respect to the purposes for which they were collected or processed; if the interested party revokes the consent to a treatment previously given; if the interested party objects to the processing pursuant to art. 21 EU Regulation n. 2016/679 ("Right of opposition"); if personal data has been collected illegally; if the personal data must be deleted due to the fulfillment of the legal obligation established by the European Union or the member state to which the Data Controller is subject;

- obtain from the Data Controller the limitation of the same when one of the



hypotheses referred to in art. 18 of Regulation n. 2016/679 <http://www.privacy-regulation.eu/it/18.htm>

The Data Controller notifies each of the recipients to whom the personal data have been transmitted of any corrections or deletions or limitations of the processing, unless this proves impossible or involves a disproportionate effort.

Finally, the Data Controller guarantees the Member the possibility of extracting in their private area a copy of the personal data being processed. The exercise of the rights provided by this article is not subject to any form constraint and is free.

Any interested party/member may apply to the Data Protection Officer for the exercise of their rights by sending a communication by e-mail to the electronic address dpo@waitaly.net or, in the same form, to the Data Controller at the electronic address privacy@waitaly.net.

For the purposes of the preceding period, the Data Controller shall take appropriate measures to provide the interested party/member with their requests regarding their personal data in a concise, transparent, intelligible and easily accessible form, with simple and clear language, providing the interested party/member with information relating to the request undertaken without undue delay and, in any case, at the latest within one month of receipt of the request; this deadline may be extended by two months, if necessary, taking into account the complexity and number of requests and in this case the Data Controller informs the interested party of such extension and of the reasons for the delay, always within one month of receiving the request .

The information requested is provided where possible by electronic means, unless otherwise indicated by the interested party.

