

POLICY ON THE PROCESSING OF PERSONAL DATA

PURSUANT TO EU REGULATION 2016/679 ('GDPR')

Dear Sir,

Caritas Italiana wish to inform you that the processing of personal data is carried out by storing the data on the online portal OSPOWEB and in paper and electronic documents held at _____.

Caritas Italiana determine what data to collect on the OSPOWEB portal and for what purposes, and are therefore joint holders in this particular respect.

a) type of data

The collection and processing will be carried out for the following types of data:

- identification and contact data: e.g. surname, name, sex, country, municipality and date of birth, fiscal code, telephone number, user's photo. Email, address, etc.;
- data on the economic and family situation: e.g. profession, poverty status, homelessness, lack of residence permit, education, marital status, household composition, family relations, ISEE, etc.;
- special categories of data (formerly 'sensitive data' in the Italian legislation): e.g. drug addiction, disability, treatment that is being received, citizenship;
- data on criminal convictions and offences (formerly 'judicial data' in the Italian legislation): e.g. charges, detention and other measures, likelihood to commit offences against children.

b) legal basis for the processing

The applicable legal bases, provided for in the GDPR, are:

- freely given consent, that can be withdrawn at any time, without detriment to you, also as regards the processing based on consent given prior to the withdrawal;
- need to ensure an adequate provision of assistance;
- need for the holders to fulfil its legal obligations;
- the holders' legitimate interest, such as:
 - provide better assistance;
 - perform statistical analysis on anonymous data;

c) purposes and means of the processing for which the data is intended:

- to define user's needs and requests and plan interventions; so that Caritas can fulfil its duty in the promotion of social and human development, and provide free advice and legal counselling through the OSPOWEB programme;
- to comply with applicable laws and regulations;
- where necessary, for the establishment, exercise or defence of the holders' rights, whether in court or out of court;
- anonymous statistics (aggregated data no longer attributable to a specific user);
- the data are processed electronically (server) at Caritas Italiana and both electronically (Hard disk, CD-ROM, DVD) and on paper (documents and files) at Finnish Caritas offices located in _____
Address _____

The data are processed by specifically authorised persons who are designated to that end.

d) recipients or categories of recipients

The data can be disclosed to persons other than the holders, as independent holders or Processors, on the basis of a legally-binding data protection agreement (IT providers, consultants, supervisory and regulatory authorities, public or private bodies with a right to request the data).

More particularly, local authorities include: local social services, local ASL and health centres, job centres and social cooperatives that have an agreement with the public authority.

The data will not be disseminated in any way.

e) mandatory or voluntary nature of the provision of data and consequences for any refusals to provide them

The provision of data is voluntary. However:

- if you refuse to provide your data, Caritas will be unable to provide any services to you;

the voluntary provision of personal data necessary for Caritas workers to provide assistance does not require consent and is informed, as in the Note at the end;

- the processing of special categories of data (formerly 'sensitive data') and/or data relating to offences, criminal convictions or security measures (formerly 'judicial data') is performed only if necessary and their disclosure outside the holder's organisation shall require the written consent of the data subject.

f) transfer of data to third countries (non-EU/EEA)

There is no transfer of data outside the EU/EEA.

g) period for which the data are stored and criteria to determine the retention period

- for the duration of the service and, subsequently, in an anonymous form, for statistical purposes;

- in the event of disputes, for the duration of the dispute and for the duration of appeal procedures;

Upon expiry of the above-mentioned retention period, the data will be destroyed, erased or made anonymous, taking into account the state of the art and the costs of implementation.

h) rights of the data subject and right to lodge a complaint with the supervisory authority

The data subjects have the following rights :

- access, to:

- know whether any data is being processed, for what purposes, the data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed, where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period, the rights of the data subject, information as to their source, whether automated decision-making, including profiling, is used (at least in those cases with meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing), the appropriate safeguards in place where the data are transferred to a third country;

- obtain a copy of the personal data undergoing processing without adversely affecting the rights of others;

- to rectification of inaccurate data and completion of incomplete data, taking into account processing purposes;

- to erasure in the following cases: a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the data subject withdraws consent where there is no other legal ground for the processing; c) the data subject objects to the processing if there are no overriding legitimate grounds; d) the personal data have been unlawfully processed; e) the holders have a legal obligation to do so f) the personal data have been collected in relation to the offer of internet services;

- to restriction of processing where the accuracy of the data is contested, where the processing is unlawful since it is excessive, for the establishment, exercise or defence of legal claims (even where the holders no longer need the data), in the case of an objection (pending verification of the existence of such right);

- to object (where processing is necessary for the performance of a task carried out in the public interest or for the legitimate interests of the holders, including profiling) for reasons relating to the particular situation of the data subject, except where that right is overridden by other rights in the public interest or legal obligations;

- to object to receiving automated commercial communications (emails, etc.) where data are processed for direct marketing purposes, including profiling;

- to data portability in a common and interoperable electronic format, even directly to one holder to another, where technically feasible, where processing is carried out by automated means.

In the cases referred to in points b), c) and d), the holders shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

For the exercise of his or her rights, the data subject can contact the organization of _____ located in _____ or send an email at: _____

Data subjects have a right to lodge a complaint with the competent Supervisory Authority in the Member State in which they normally reside or work or in the State in which the alleged violation occurred.

i) Holder of data treatment

Co-Holder of the data collected through 'OsPoWeb' locally: _____
Address _____ The organization is the owner for the definition of the data that should be collected on the portal 'OsPoWeb' and for what purposes.

k) Data Protection Officer (hereinafter also referred to as 'D.P.O.')

The D.P.O. (Data Protection Officer) is a person whom the holders may nominate for the protection of personal data. Pursuant to Article 38(4) of the GDPR, you may contact the D.P.O. appointed by the organization for all aspects related to personal data processing and the exercise of the rights derived from the GDPR.

Name and Surname: _____

Date of birth: _____

Birth place: _____

1) Note for the processing of personal data

The data subject has provided his or her data, having been informed of the privacy policy the date _____ Officer _____

2) Consent by the interested person

Having read the Privacy Policy above, aware that my consent is freely given and can be withdrawn at any time, I consent to the transfer of my sensitive and judicial data outside the holder's organisation as specified in point 'd) recipients or categories of recipients'

I GIVE MY CONSENT

I DO NOT GIVE MY CONSENT

Location and date: _____

Signature of the interested person _____