



**DATA PRIVACY NOTICE pursuant to Articles 13 and 14 of Regulation (EU) 2016/679
regarding the processing of personal data of course participants and instructors**

1. DATA CONTROLLER

The Data Controller is EASY B S.r.l., which, as the Data Controller under Regulation (EU) 2016/679, concerning the "protection of individuals with regard to the processing of personal data and on the free movement of such data", hereby informs you that the processing of your data will be based on principles of fairness, legality, transparency, and the protection of confidentiality and rights.

2. REPRESENTATIVE OF THE DATA CONTROLLER AND DATA PROTECTION OFFICER

This organisation does not require the appointment of a Representative of the Data Controller or a Data Protection Officer as per the Regulation.

3. PURPOSES OF DATA PROCESSING

The processing of your personal data as a participant/instructor in courses organised by the company is carried out to manage your course participation and send newsletters about the company's initiatives.

The processed data may include:

- Personal details, email and telephone contacts, and professional role
- Information/opinions/requests sent by the Data Subject regarding various courses
- Billing and payment data
- For the instructor, professional CV and certification of skills

4. LEGAL BASIS AND LAWFULNESS OF PROCESSING

Regarding the lawfulness of processing, it is specified that the processing is based on a legitimate interest, deemed justified, considering that the processed data has minimal impact on the rights and freedoms of the individual.

For the data of the instructor and/or freelance participant (data related to billing and payment), the legal basis is the execution of contractual obligations.

5. METHODS OF PROCESSING

All processing is carried out by adopting appropriate technical and organisational security measures, as stated in Article 32 of the Regulation. All data is processed electronically, and measures are implemented to minimise processing in terms of data type, access authorisations, and retention times.

6. RECIPIENTS OF PERSONAL DATA AND DATA PROCESSORS

Personal data may also be known to the entity that provides and manages the management software, newsletter service, hosting services, and system administration.

Payment data will also be communicated to tax consultants.

These entities are appointed by the owner as Data Processors.

Competent public bodies (e.g., the Revenue Agency) are recipients of payment-related data.

Under no circumstances will your data be subject to dissemination.

7. TRANSFER OF DATA TO A THIRD COUNTRY

Only your email address may be transferred to newsletter service providers; specifically, the provider MailChimp is used, which may have servers in the USA; in this case, the transfer occurs under the guarantees of Standard Contractual Clauses (SCC).

8. PERIOD OF RETENTION OF PERSONAL DATA

Your personal data referred to in point 3 of this notice will be stored for 10 years from the last contact and until any request for deletion by you, which may be accepted if there are no purposes for the execution of contractual obligations.



9. RIGHTS OF THE DATA SUBJECT

You have the right to request from the Data Controller access, deletion, communication, updating, rectification, opposition to processing, integration, limitation, portability, knowledge of the violation of your personal data, and in general, you may exercise all the rights provided for in Articles 15 and following of Regulation (EU) 2016/679. All the aforementioned rights can be exercised at any time by writing to the Data Controller at the company's PEC (Certified Email).

10. SUPERVISORY AUTHORITY

You have the right to complain to the competent supervisory authority "Italian Privacy Guarantor" if you believe that your rights in the area of personal data protection are at risk [garanteprivacy.it].

11. AUTOMATED DECISION-MAKING PROCESS

Your data will not be included in any automated decision-making process.