

## Privacy Statement (art. 13 Reg. UE 2016/679)

Dear Trainees,

In order to establish the contractual relationship concerning **professional training**, as holder of the processing of your personal data, we hereby inform you of this circular under and by effect of art. 13 EU Regulation 2016/679, as well as the current Italian legislation.

HOLDER OF THE PROCESSING	"FASCIAL MANIPULATION INSTITUTE" BY STECCO, C.F./P. IVA 04029450246, with Headquarters, in 35129 PADOVA, Via Cavalieri di Vittorio Veneto n. 19 – tel +390495462902 – email info@fascialmanipulation.com
DATA PROTECTION OFFICER (DPO)	Currently a data protection officer has not been nominated
PURPOSE OF THE PROCESSING	The processing is aimed at the establishment and management of a contractual relationship concerning professional training that relates to the manipulative evaluation and treatment technique identified by the Manipolazione Fasciale® and / or Manipolazione della Fascia® and / or Fascial Manipulation® and / or "STECCO™" brand. This includes all related legal, financial and contractual obligations, in any case connected to the above-mentioned relationship.
LEGAL BASIS OF PROCESSING	The processing of personal data is related to the fulfillment of the contractual obligation and the fulfillment of legal, financial and contractual obligations related to the same. For the possible processing of particular data (article 9 GDPR), the person concerned gives his / her consent where necessary (for example for the communication of an absence due to illness).
LEGITIMATE INTEREST OF THE HOLDER	The processing of personal data is also based on the legitimate interest of the holder, such as the execution of the contract.
PROVISION COMPULSORINESS	The provision of personal data is mandatory for the purpose of establishing and managing the contractual relationship concerning the professional training activity in relation to the manipulative technique of assessment and treatment as identified by the Manipolazione Fasciale® and / or Manipolazione della Fascia® and / or Fascial Manipulation® and / or "STECCO™" brand.
CONSEQUENCES OF A MISSED PROVISION	The provision of data is mandatory for all that is required by legal and contractual obligations and therefore any refusal to supply them in whole or in part may give rise to the impossibility for the Data Officer to execute the contract or to correctly perform all the obligations related to the aforementioned relationship.
PROCESSED DATA CATEGORIES	The data that will be processed during the contract will be:  <ul style="list-style-type: none"> <li>✓ common / identifying personal data, including: biographical data, residence / domicile data, email</li> <li>✓ particular data (already sensitive data) pursuant to art. 9 GDPR exceptionally for absence for illness or similar.</li> </ul> <p>If it is expected, even exceptionally with respect to the processing of particular and penal data that this processing can happen only with respect to the provisions of art. 9 and other regulations referring to it, in any case, subject to appropriate consent where necessary.</p>
POTENTIAL RECIPIENTS OF PERSONAL DATA	The data may be communicated to subjects specifically appointed by the Data Officer, as well as to subjects connected to the person concerned by collaborations relationships, companies and / or associations, professionals and consultants for the provision of ancillary services to those involved in the relationship with the Data Subject; in any case also to third parties that operate, also in the name and on behalf of the Data Officer, for the execution of the services connected to the purposes indicated in this statement, both intra-EU and extra-EU (such as third-party Providers

	<p>that organize of course).</p> <p>In the last case, the Data Officer acknowledges and undertakes to respect the rules of conduct set out in the adequacy decisions concerning:</p> <ul style="list-style-type: none"> <li>✓ the United States of America, the EU - US Privacy Shield protocol valid for certain companies located in that country and whose list can be found at the following URL <a href="https://www.privacyshield.gov/list">https://www.privacyshield.gov/list</a></li> <li>✓ other countries: the related adequacy decisions are valid for transfers to the following countries: Andorra - Argentina - Australia - PNR - Canada - Faer Oer - Guernsey - Isle of Man - Israel - Jersey - New Zealand - Switzerland - Uruguay.</li> </ul> <p>By way of example but not exhaustive, it is:</p> <ul style="list-style-type: none"> <li>✓ Provider of which the Data Officer uses to organize the courses</li> <li>✓ Lawyers</li> <li>✓ Accountants</li> <li>✓ Consultants</li> <li>✓ Companies supplying ancillary services, such as software houses, web agencies and similar</li> <li>✓ Companies supplying other products or services connected to the performance of the activity subject of the relationship with the interested party; e.g. Third-party providers based outside of the EU, provided that they are in the Privacy Shield scheme.</li> </ul> <p>The personal data of the students who obtained the certificate can be published on the website of the Holder.</p>
PRESERVATION PERIOD	The data will be kept for the duration of the report indicated above. In any case, the processing cannot have a longer duration, for each processed data, at the end of the limitation period for the limitation of the rights connected to that data.
RIGHTS OF THE PERSON CONCERNED	<p>Each interested party has the right to access, rectify, cancel (forget), limit, receive notification in the case of rectification, cancellation or limitation, portability, opposition and not be subject to an automated individual decision, including the profiling, pursuant to articles from 15 to 22 of the GDPR.</p> <p>These rights may be exercised in the forms and terms set forth in art. 12 GDPR, by written notice sent to the Data Officer by e-mail at <a href="mailto:info@fascialmanipulation.com">info@fascialmanipulation.com</a></p> <p>The Data Controller will reply as soon as possible and in any case within 1 month from receipt of the request</p>
RIGHT OF REVOCATION OF THE CONSENT	<p>You may revoke this consent at any time via</p> <ul style="list-style-type: none"> <li>✓ sending an email to the address of the holder <a href="mailto:info@fascialmanipulation.com">info@fascialmanipulation.com</a>;</li> <li>✓ sending an express communication to the headquarters of the Holder.</li> </ul>
COMPLAINTS	<p>Each interested party has the right to lodge a complaint pursuant to arts. 77 and following of the GDPR to a supervisory authority, which for the Italian State is identified in the Guarantor for the protection of personal data.</p> <p>The forms, methods and terms for proposing complaints are foreseen and governed by the national legislation in force.</p> <p>The claim is without prejudice to administrative and jurisdictional actions, which for the Italian State may alternatively propose to the same Guarantor or the competent Court.</p>