

The Global Campus of Human Rights with registered office in Venice Lido (VE), Riviera San Nicolò, 26, VAT/VAT/C.F. in the header (hereafter only "GC" or "Data Controller"), as Data Controller (in the person of the pro-tempore legal representative), informs you, in accordance with art. 13 of the Legislative Decree. 196/2003 and subsequent amendments ("Privacy Code") and EU Regulation 679/2016 applicable from 25 May 2018 - General Regulation on Data Protection ("GDPR") (hereinafter "Privacy Code" and "GDPR" are collectively referred to as "Applicable Regulations"), that your data will be processed in the subsequent manner and for the following purposes:

The document provides information on the processing of personal data collected by the Data Controller through this website (hereinafter referred to as "Site") and therefore constitutes information to the data subjects accessing it (hereinafter referred to as "Users"), pursuant to the aforementioned regulations and does not apply to information collected through channels other than the Site. The purpose of the privacy policy is to provide maximum transparency regarding the information that the Site collects and how it is processed. This privacy policy may be subject to change over time, depending on relevant legislative and regulatory additions and changes or our institutional decisions. Therefore, we invite Users to periodically consult this section of the Site.

**Subject of this policy**

The Owner has decided to provide Users with specific information within the sections of the Site in which Users access occasionally in order to allow them to be fully and specifically informed about the purposes for which the data, provided by them within that section, will be processed.

Consistently with the determination of the Owner, assumed for the sole purpose of ensuring the clarity of information provided to Users, reference is made to the sections of the Site in which personal data is provided and which therefore show the presence of specific information.

The sections identified to date, but which may change according to the specific needs of the Owner are:

- Links can be clicked on from the "Log In" and "Submission" area of the Site where data is collected for the submission of articles to be published in the *Global Campus of Human Rights Journal* active at the time of the User's access and other purposes specified in the information created ad hoc.

In the sections of the Site listed above are processed data of various kinds:

*Common personal data provided by the User for the use of services or interaction with the Site's functionalities*

Common personal data may be - and in any case spontaneously - provided by Users when they interact with the Site's functions or ask to use the services offered on the Site (donations, sponsorships, fundraising campaigns, subscription to the newsletter, request for information and registration to any training initiatives also through the contact forms, etc.);

*Particular personal data provided by the User for the use of the services or interaction with the Site's functionalities*

"Sensitive" personal data such as, for example, those relating to health status, racial or ethnic origin, or belonging to special categories of personal data pursuant to art. 9 of the Regulation. If this is the case, such processing will be carried out on the basis of the Users' explicit consent; and therefore the texts of the information are present herein.

This document provides specific information regarding: browsing data, common personal data collected through cookies (as more fully specified in the Cookie Policy) and data spontaneously provided by the User as categories of data processed by the owner not present in the information referred to in the sections of the Site listed above.

**Personal data subject to processing**

"Personal Data" means any information concerning an identified or identifiable natural person.

*Navigation Data*

The computer systems and programs used to operate the Site collect some personal data whose transmission is implicit in the use of Internet communication protocols (e.g. IP addresses or domain names of computers used by users who connect to the Site, URI addresses -Uniform Resource Identifier- of requested resources, time of the request, method used to submit the request to the server, size of the file obtained in response, numerical code about the status of the response made by the server -good end, error, etc.- and other parameters relating to the operating system and computer environment of the User). Although this information is not collected in order to be associated with identified interested parties, by its nature it could, through processing and association with data held by third parties, allow the Users to be identified. Such data are used for the sole purpose of obtaining statistical information not associated with any User identification data on the use of the Site and to check its correct functioning and are deleted immediately after processing.

*Data provided spontaneously by the User*

For consultation of the public pages of the Site, no personal data is required from the User. However, any contact with GC, the optional, explicit and spontaneous sending of messages, electronic or traditional mail, to their addresses involves the subsequent acquisition of the address, including e-mail, the sender or the relevant telephone number, necessary to respond to requests, as well as any other personal data included in the related communications. Such data will be used solely for the purpose of responding to the User's request and may be communicated to third parties only if necessary for this purpose. Such data are kept for the time strictly necessary to provide the User with the requested service and will not be disclosed.

**Cookie**

Common personal data collected through cookies as specified in the Cookie Policy;

**Data relating to minors**

GC does not accept registrations, purchases of services, donations made by children under the age of eighteen (18) years, nor does it knowingly collect or use personal data about them. Minors are urged not to register or purchase online and to ask an adult to perform the necessary procedures.

**Purpose of data processing and legal basis**

The Personal Data that you provide through the Site will be processed by GC for the following purposes:

**1. statistical research/analysis purposes on aggregate or anonymous data**, without any possibility of identification, aimed at measuring the functioning of the Site, measuring traffic and evaluating usability and interest;

**2. to provide the services requested by the interested party**(e.g. management of the registration and access processes to the Site, management and maintenance of the Site, management of the User's account, user assistance, and management of any complaints, processing of data for the provision of individual services requested by the User). For these purposes, GC may process personal data without the consent of the Data Subject in accordance with Article 6(1)(b) of the GDPR (purposes relating to the execution of a contract to which you are party or the execution of pre-contractual measures taken at the request of the Data Subject);

**3. for the fulfilment of any legal obligations** such as, for example: safety incident reporting obligations. For these purposes the data may be processed by the Data Controller, without the consent of the Data Subject pursuant to art. 6 par. 1 letter c) of GDPR (purposes inherent to the fulfilment of a legal obligation to which the Data Controller is subject);

**4. purposes related to the establishment, exercise or defence of a right in court or whenever the courts exercise their judicial functions.** This purpose can be pursued by the Data Controller without the consent of the Data Subject because it represents a legitimate processing of Personal Data pursuant to the Applicable Law since, once the Personal Data have been provided, the processing is indeed necessary to fulfil a legal obligation to which the Data Controller is subject pursuant to art. 6 par. 1 letter c);

**5. for marketing purposes**with the consent of the interested party, pursuant to art. 6 par. 1 letter a) of GDPR (express consent of the interested party), by sending, by e-mail, traditional mail (paper), telephone, fax and/or SMS/MMS, push notifications and through any other IT channel (eg. websites, mobile social applications, etc.) of newsletters and commercial communications relating to the products or services offered by GC, as well as, by telephone or e-mail, statistical analyses, surveys and market surveys, including online, relating to the products and services offered by the Owner.

With respect to the purposes set out in points 1 to 4, the provision of data is necessary and any refusal to do so will make it objectively impossible to use the services. It is not necessary to obtain the consent of the data subject for such processing purposes.

The provision of any data, for example data relating to the profile, other than those required, is entirely optional and free and any refusal to do so does not affect in any way the possibility of using the services. In this case, however, the user may not be able to make full use of some features of the Site that technically require the provision of certain information.

The provision of data that may be functional to the pursuit of the purpose referred to in point 5 is not mandatory and any refusal to do so does not affect in any way the possibility of using the services. In this case, however, GCHR may not be able, for example, to transmit promotional material aimed at services that may be of greater interest. In any case, it is understood that the processing of data for such purposes can only take place if the data subject has given his consent, which he may revoke at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation.

**Methods of data processing**

The processing of personal data is carried out by computer, telematic and manual means, with logic strictly related to the purposes and, in any case, so as to ensure the security of the same.

**Categories of subjects to whom the data may be communicated**

Your Personal Data may be shared, for the purposes specified, with:

a. subjects necessary for the provision of the services offered by the Site including, by way of example: hosting and backend infrastructure providers of the Site, providers of services for the management of the email/telephone contact database, the sending of emails and the analysis of the functioning of the Site; IT services, management of marketing and analysis activities. These parties typically act as GC's data processors;

b. persons authorised by GC to process Personal Data who are committed to confidentiality or have an adequate legal obligation of confidentiality; (e.g. employees and consultants appointed by the Data Controller who need to process data for the performance of their duties); (a. and b. are collectively "Recipients");

c. communicated to third parties who process the data autonomously and in compliance with the law only to execute the purchase contract (e.g. payment intermediary or credit institution for the execution of electronic payment services at a distance by credit/debit card)

d. courts in the exercise of their functions when required by the Applicable Rules.

Personal data will not be disclosed or transferred to third parties for use for their own purposes.

**Transfers**

Personal data may be transferred abroad within or outside the European Union, within the limits and under the conditions set out in Articles 44 et seq. of EU Regulation 2016/679 in particular:

- to third countries international organizations for which the Commission has intervened with an assessment of adequacy (art. 45 EU Regulation 2016/679)
  
- to third countries or international organisations which have provided adequate guarantees and where the person concerned has effective rights and remedies (Article 46 EU Reg. 2016/679);
  
- to third countries or international organisations on the basis of derogations in specific situations (art. 49 EU Reg. 2016/679).

**Data retention**

The personal data of the interested party will be kept for the time necessary to achieve the purposes described above. In particular:

- a) for the purposes referred to in point 1: indefinitely because the data are anonymous or irreversibly anonymized;
- b) for the purposes referred to in point 2: until the interested party decides to unsubscribe from the service;
  
- c) for the purposes referred to in point 3: for reporting computer incidents 30 days;
  
- d) for the purposes referred to in point 4: time allowed by Italian law to protect his interests (Art. 2947 paragraphs 1 and 3 C.C.);
  
- e) for the purposes referred to in point 5: in compliance with the terms prescribed by law for the type of activity (24 months for marketing) and in any case until the revocation of consent or until the exercise of the right of objection art. 21 GDPR; We point out that if the interested party has already used GC services (customer), we may send by email commercial communications relating to GC services and products similar to those you have already used, unless you disagree (art. 130 c. 4 Privacy Code).

Outside of these cases, your personal data will only be stored for the purpose of fulfilling the legal and regulatory obligations of the Data Controller, or for purposes of proof relating to the exercise of the right of defence.

**The rights of the interested party**

Within the limits of the Applicable Regulations, you have the right to ask GC, at any time, for access to your Personal Data, to rectify or delete them or to oppose their processing, to limit their processing and to obtain the data concerning you in a structured, commonly used and readable by automatic devices format.

Requests should be sent by e-mail to: [privacy@gchumanrights.org](mailto:privacy@gchumanrights.org)

In accordance with the Applicable Regulations, you have in any case the right to lodge a complaint with the competent supervisory authority (Guarantor for the Protection of Personal Data) if you believe that the processing of your Personal Data is contrary to current legislation.

**Amendments**

This updated Privacy Policy is effective from July 20, 2020. GC reserves the right to modify or simply update its content, in part or in full, also due to changes in the Applicable Policy. GC will inform you of such changes as soon as they are introduced and will be binding as soon as they are published on the website for the purposes for which consent is not required.