

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA
art. 13 del Regolamento UE 2016/679

Dear Athlete,

This information is provided, pursuant to Article 13 of the EU Regulation 2016/679 (hereinafter, "**Regulation**"), by Engagigo S.r.l., as the Data Controller, with reference to the processing of data relating to the ENDUpix service.

With reference to the images and/or videos made during the sporting events, please refer to the [Privacy Policy](#) made at the time of registration to the ENDU platform and the sporting event.

Categories of personal data processed

Engagigo S.r.l., as the data controller pursuant to the Regulation (hereinafter, "**Engagigo**" or "**Data Controller**"), will process your personal data in order to provide you with the service of purchasing the photos/videos of the sporting event that portray you and carried out during the event (the "Photos") as well as to allow you to identify the Photos (hereinafter, also "**Services**"). In particular, Engagigo will process the following types of personal data:

- identification and contact data;
- personal data relating to images and/or videos produced during the sporting event;
- where necessary, data relating to the payment made (e.g. card number, billing address);

hereinafter, "**Personal Data**".

Furthermore, in order to allow you to easily identify the Photos, subject to your explicit consent, the Data Controller may process personal data belonging to particular categories pursuant to Article 9 of the Regulation, and in particular the biometric data acquired by means of a selfie provided by you in the purchase process (hereinafter, "**Particular Data**").

In the event of the participation of a minor in a sporting event, the Services may only be requested by a person exercising parental responsibility over the minor, who must also give consent to the processing of Personal Data on behalf of the minor. By consenting to the processing of the Personal Data of the child, the applicant guarantees that he/she has parental responsibility over the child and that he/she is authorised to give consent.

Purpose and legal basis of the processing for which the data is intended

The personal data provided by you will be used for the following purposes:

a) To provide the purchasing service and to ensure the identification of the Photos

Engagigo will process, in accordance with Article 6, paragraph 1, letter b) of the Regulation, your Personal Data in order to provide you with the Services and allow you to purchase the Photos.

Furthermore, in order to allow you to identify the Photos, the Data Controller, subject to your explicit consent, may process your Particular Data pursuant to Article 9, par. 2 (a) of the Regulation.

The consent given can be revoked at any time by writing to toinfo@endu.net.

The provision of your Personal Data is necessary to allow you to use the Services. Any refusal to provide this data will make it impossible for Engagigo to provide the Services.

The provision of your Personal Data is necessary to allow you to use the Services, unless it is possible to identify the Photos in ways other than by uploading the selfie as described from time to time in the purchase process; the refusal of consent for the processing of the Personal Data will not allow ENDU to identify the Photos and consequently the provision of the Services, unless there are no alternative ways to identify the Photos.

b) Transfer of data to the partners for their marketing purposes

In some cases, as an alternative to the payment of the cash fee provided for the Services, ENDU may offer you the opportunity to use the same Services by giving your express and specific consent for ENDU, pursuant to Article 6, paragraph 1, letter a) of the Regulation, to communicate your identification and contact data (name, surname, e-mail address) to the partners indicated in the purchase flow for the sending of marketing communications by the latter (also by means of automated systems such as email and instant messaging systems such as "Whatsapp").

This consent is optional and is not a condition for the use of the Services which will always be purchasable by payment of a cash fee.

The consent given can be revoked at any time by writing to info@endu.net, made in any case without prejudice to the lawfulness of the communication that may have occurred before said revocation. In case of revocation, where the communication of data has already taken place, Engagigo will act as far as possible to bring the revocation to the knowledge of the data assignee.

Data processing methods

The processing of data will be carried out manually and/or using automated and computerized methods, always in compliance with the security measures specified in Article 32 of the Regulation. It will be performed by specifically authorized individuals, in accordance with the provisions of Article 29 of the Regulation. Security measures will therefore be implemented to ensure the confidentiality of the data subject to whom the data relates and to prevent access by third parties or unauthorised personnel.

Storage

We would like to inform you that, in accordance with the principles of lawfulness, purpose limitation, and data minimisation, as stated in Article 5 of the Regulation, the retention period for your personal data is determined to be no longer than necessary for the purposes for which the data is collected and processed, and in compliance with the timeframes prescribed by law.

In particular, to ensure the correct execution of the Services, the images relating to the sporting event will be stored for a maximum of 14 months from the date of the sporting event to which the Photos refer. Please note that the selfie and the biometric data processed instantly for recognition purposes will not be stored.

Scope of communication and dissemination

The images will not be disseminated or disclosed publicly and will be accessible only to users of the Services through the use of credentials and other authentication systems used by Engagigo from time to time to limit access to the Photos.

Your personal data, in relation to the purposes mentioned above, may be disclosed to the following categories of recipients:

- Internal or external staff in charge of taking and processing photos and videos and subsequently making them available online and offline to be edited by Engagigo S.r.l. or its associates.

Transfer of data to third countries

To guarantee the service offered by ENDU, the Data Controller transfers certain personal data to suppliers located outside the European Union (Israel).

The transfer of data outside the European Union takes place in compliance with the applicable provisions on the matter and, in particular, with the rules set out by Regulation (EU) 2016/679. In particular, the transfer takes place in compliance with the provisions of Art. 45 par. 1 (decision of the European Commission of 31/01/2011, which gave approval with respect to the level of protection of the third country in question).

Data Controller, Data Processor and DPO

The Data Controller is Engagigo S.r.l., in the person of its legal representative. The list of Data Controllers and the name of the designated DPO can be consulted at the company headquarters in Via F. Paciotto 6/A, Alberi di Vigatto (PR) or by writing to privacy@endu.net.

To enforce the rights of the data subject or to request further information, please contact the Data Controller "**Engagigo S.r.l.**" at its registered office in **Via F. Paciotto 6/A, Alberi di Vigatto (PR)**, or the DPO at the email address **dpo@endu.net**.

Rights of the data subject

At any time, in accordance with the provisions of Articles 15-22 of Regulation (EU) 2016/679, you may exercise the right to:

- a) ask for confirmation of the existence or otherwise of your personal data and, if it does exist, obtain access to your personal data and the information indicated in b) below
- b) request information about the purposes of the data processing, the categories of personal data, the recipients or categories of recipients to whom the personal data has been or will be communicated (in particular if these recipients are third countries or international organisations) and, when possible, the data storage period
- c) request the rectification and erasure of the data
- d) withdraw consent at any time (however, the withdrawal of consent does not affect the lawfulness of the processing carried out based on consent given prior to the withdrawal)
- e) request the restriction of processing
- f) obtain data portability, i.e. receive your personal data from the Data Controller in a structured, commonly used and machine-readable format, and transmit it to another Data Controller without hindrance
- g) object to processing at any time, including in the case of processing for direct marketing purposes
- h) request confirmation of the fulfilment of the provisions of Art. 19 of Regulation (EU) 2016/679 by the Data Controller, namely that any correction, erasure, or limitation of the processing carried out pursuant to Art. 16 of Regulation (EU) 2016/679 is communicated to each of the recipients to whom the personal data has been transmitted, except in cases in which this proves to be impossible or would involve a disproportionate effort.

Finally, we inform you that, in accordance with current regulations, you may submit any complaints regarding the processing of your personal data to the Supervisory Authority for the protection of personal data.