

PRIVACY NOTICE – TORINO 2033 WEBSITE

pursuant to Art. 13 of EU Regulation 2016/679 (GDPR)

This notice is issued pursuant to Art. 13 of Regulation (EU) 2016/679 ("GDPR") and describes how the personal data of users who consult and use the website www.torino2033.com (the "Website") is processed. The Website is dedicated to Turin's candidacy as European Capital of Culture 2033.

Through the Website it is possible to consult information about the Torino 2033 project, take part in initiatives promoted by the Foundation, submit an application as a volunteer, contact the relevant offices and make use of the online services made available.

This notice applies exclusively to the processing of personal data carried out through the Website and does not extend to processing carried out through other channels, nor to third-party websites that may be reached via hyperlinks. The Foundation is not responsible for the processing of personal data carried out by the operators of such websites, who act as autonomous data controllers and make their own privacy notices available. For specific activities or initiatives involving further processing of personal data, the Foundation may make dedicated privacy notices available.

DATA CONTROLLER

The data controller is Fondazione per la Cultura Torino, with registered office at Via Meucci 4 – 10122 Turin, reachable at privacy@fondazioneperlaculturatorino.it. The Data Protection Officer (DPO) is Dr. Giuliana Dolci, reachable at the same address, privacy@fondazioneperlaculturatorino.it.

TYPES OF DATA PROCESSED

Through the Website, the following categories of data may be processed:

- **browsing data:** data automatically acquired by IT systems during browsing (IP addresses, browser and device type, pages visited, access times), processed in aggregate form for statistical and security purposes;
- **data provided voluntarily:** data communicated by the user by filling in the forms available on the Website (for example the volunteer application form or contact requests), such as first name, last name, e-mail and other information entered;
- **cookies and similar technologies:** as described in the Website's Cookie Policy.

PURPOSES AND LEGAL BASES OF THE PROCESSING

- **enabling browsing and ensuring the security of the Website** — legitimate interest of the Controller, Art. 6, par. 1, lett. f);
- **responding to requests sent through the contact forms** — pre-contractual measures or response to a request from the data subject, Art. 6, par. 1, lett. b);
- **managing applications to the volunteer programme** — as described in the notice dedicated to volunteers;
- **compiling aggregate statistics on the use of the Website** — compiling statistics on the use of the Website by means of cookies and similar technologies, where applicable on the basis of the data subject's consent expressed through the consent management system.

PROVISION OF DATA

Providing browsing data is necessary to enable the Website to function correctly and to deliver the related services. Providing the personal data requested through the Website's forms is optional; however, failure to provide the data

marked as mandatory makes it impossible to act on the data subject's request (for example, a volunteer application or a request for information).

RECIPIENTS OF THE DATA

Personal data is processed by the Foundation's authorised staff, who act on the basis of documented instructions given by the Controller, and by external parties that provide services functional to the management and operation of the Website, appointed as data processors pursuant to Art. 28 GDPR. This category includes, by way of example, providers of IT services and of hosting and maintenance services for the technology platforms. Personal data is not disseminated and may be disclosed exclusively to parties to whom disclosure is required by law or requested by the competent Authorities.

TRANSFER OF DATA ABROAD

Should the use of technical service providers involve the transfer of personal data to third countries or international organisations, such transfer will take place in compliance with Articles 44 et seq. of the GDPR, on the basis of an adequacy decision of the European Commission or through the adoption of the appropriate safeguards provided for by the GDPR, including, where applicable, the Standard Contractual Clauses (SCC) adopted by the European Commission.

RETENTION PERIODS

Browsing data is retained for the time strictly necessary to achieve the purposes for which it was collected, in compliance with the principles of data minimisation and storage limitation set out in Art. 5 GDPR, as well as for the Website's security and operational needs. Personal data provided through the Website's forms is retained for the time necessary to handle the data subject's request and, thereafter, for the period set out in the Foundation's Data Retention Policy, determined according to the type of request, the purposes pursued and any applicable statutory obligations.

COOKIES

The Website uses cookies and similar technologies as described in the related Cookie Policy, available in the dedicated section of the Website. Where required by applicable law, the user may express, refuse or change their preferences regarding the use of non-technical cookies at any time, through the dedicated banner or the consent management tools made available.

MANNER OF PROCESSING

Personal data is processed mainly by IT and electronic means, in compliance with the principles of lawfulness, fairness, transparency, minimisation, integrity and confidentiality set out in Art. 5 GDPR. The Foundation adopts adequate technical and organisational measures, pursuant to Art. 32 GDPR, to ensure a level of security appropriate to the risk and to protect data against unauthorised access, loss, alteration or unlawful disclosure. No automated decision-making processes, including profiling, within the meaning of Art. 22 GDPR, are used in connection with the processing carried out through the Website.

RIGHTS OF DATA SUBJECTS

In relation to the processing described above, the data subject may exercise, at any time, the rights set out in Articles 15 et seq. of Regulation (EU) 2016/679, and in particular:

- **right of access (Art. 15):** to obtain confirmation of whether processing of their data is taking place and to access information on purposes, categories of data, recipients and retention period;
- **right to rectification (Art. 16):** to obtain the correction of inaccurate data and the completion of incomplete data;

- **right to erasure (Art. 17):** to obtain the erasure of their data, except where legitimate grounds exist that prevent the exercise of this right;
- **right to restriction of processing (Art. 18) and right to object (Art. 21):** to restrict or object to certain processing operations in the cases provided for;
- **right to data portability (Art. 20):** to receive, in a structured, commonly used format, the data processed on the basis of consent or a contract by automated means, and to transmit it to another controller;
- **right to withdraw consent:** where processing is based on consent, to withdraw it at any time without affecting the lawfulness of the processing carried out before the withdrawal;
- **right to lodge a complaint (Art. 77):** to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) (www.garanteprivacy.it/reclamo).

HOW TO EXERCISE YOUR RIGHTS

Requests may be addressed to the Controller at privacy@fondazioneperlaculturatorino.it. The Controller will respond without undue delay and, in any event, within 30 days of the request. The exercise of these rights is free of charge pursuant to Art. 12 GDPR; in the case of manifestly unfounded or excessive requests, including because of their repetitive nature, the Controller may charge a reasonable fee or refuse to act on the request.

Where it is not possible to send the request by e-mail, it may be sent by registered letter with return receipt to the Foundation's offices at Via Meucci 4, 10122 Turin.

Turin, 22 July 2026