

PRIVACY NOTICE – VOLUNTEERS

“Torino 2033 – European Capital of Culture” candidacy – pursuant to Articles 13 and 14 of EU Regulation 2016/679 (GDPR)

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (the “GDPR”), Fondazione per la Cultura Torino (the “Foundation”) informs you of the manner and purposes of the processing of personal data of individuals who apply for and take part as volunteers in Turin’s candidacy as European Capital of Culture 2033.

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

In connection with the volunteering programme, the Foundation processes the following categories of data:

- personal identification data (first name, last name, date and place of birth, tax code);
- contact details (address, e-mail, telephone number);
- data relating to the application and participation (availability, areas of interest, skills, languages, prior volunteering experience, activities carried out);
- images and audio/video recordings that may be made during events and activities, subject to specific consent (see below);
- any personal data arising from the use of online meeting assistance tools, such as recording, automatic transcription and the generation of meeting summaries.

PURPOSES AND LEGAL BASES OF THE PROCESSING

The data is processed for the following purposes:

- **managing the application and the volunteering relationship** in all its stages (selection, accreditation, organisation of activities, training and service communications) — legal basis: pre-contractual measures and management of the relationship, Art. 6, par. 1, lett. b), as well as the Foundation’s legitimate interest in managing volunteers, Art. 6, par. 1, lett. f);
- **compliance with legal** and insurance obligations connected with the volunteering activity — legal basis: Art. 6, par. 1, lett. c);
- **producing photographs, recordings and materials** for documenting and promoting the candidacy’s activities, including via the website and social media channels — legal basis: consent, Art. 6, par. 1, lett. a), freely revocable;
- **sending informational communications** about the programme and related initiatives — legal basis: consent, Art. 6, par. 1, lett. a).

Providing the data necessary to manage the volunteering relationship is optional, but failure to provide it makes it impossible to join the programme. Processing based on consent (images, communications), on the other hand, is entirely optional and its absence does not affect participation.

RECIPIENTS OF THE DATA

The data may be disclosed to:

- the Foundation’s staff and collaborators authorised to process data pursuant to Articles 29 and 32 GDPR;

- external parties acting on behalf of the Foundation, appointed as data processors pursuant to Art. 28 GDPR (e.g. IT service providers, volunteer management platforms, insurance companies);
- the City of Turin and other partner bodies of the candidacy, to the extent necessary for organising joint activities;
- Authorities and Public Administrations, where required by law.

The data is not disseminated, except for images for which specific consent has been given, and is not subject to automated decision-making processes or profiling.

TRANSFER OF DATA ABROAD

As a general rule, personal data is processed within the European Economic Area. Should the use of specific IT services involve the transfer of data to third countries, such transfer will take place in compliance with Articles 44 et seq. of Regulation (EU) 2016/679, on the basis of an adequacy decision of the European Commission or through the adoption of the Standard Contractual Clauses (SCC), supplemented, where necessary, by additional measures suitable to ensure a level of protection substantially equivalent to that provided within the European Union.

MEETING ASSISTANCE TOOLS

Certain online meetings and training activities may make use of assistance tools that enable recording, automatic transcription and the generation of meeting summaries. Such tools process the voice, image and content of participants' contributions, thereby constituting, to all effects, a processing of personal data. The use of such services may involve the transfer of personal data to countries located outside the European Economic Area. In such cases, the Foundation ensures that the transfer takes place in compliance with Articles 44 et seq. of the GDPR, by means of an adequacy decision of the European Commission or through the adoption of the Standard Contractual Clauses (SCC), supplemented, where necessary, by additional security measures.

RETENTION PERIODS

The data is retained for the entire duration of the volunteering relationship, in accordance with the retention periods set by the Foundation in compliance with applicable law. Images disseminated on the basis of consent are retained until the consent is withdrawn, without prejudice to copies already published by third parties that are no longer within the Foundation's control.

MANNER OF PROCESSING

Processing is carried out by the Controller and by authorised, trained personnel, in compliance with the principles of Art. 5 GDPR, using paper-based and electronic tools and adequate security measures (user authentication, access control, backup systems, encryption measures where applicable, and organisational procedures aimed at ensuring the confidentiality, integrity and availability of personal data).

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