



PRIVACY POLICY FOR PARTICIPATION IN THE EVENT

“TRENTO RUNNING FESTIVAL”

1) Data controller and categories of processed data

Participation in the ‘Trento Running Festival’ event and the provision of related services involve the processing of participants’ ‘common’ personal data, such as: personal details and membership of sports clubs/organizations; images captured on video and photographs; times of transit at checkpoints and/or timing points; geographical location data for participating individuals who use a device for geographical position detection and the services associated with it; data and copies of certificates of fitness for sporting activities.

Non-common personal data relating to the data subject’s health (i.e. data on medical conditions obtained from medical certificates or declared in writing directly by the data subject) may also be processed, where strictly necessary for the purposes of registration and participation in the ‘**Trento Running Festival**’ event and only with the explicit and express consent of the data subject. In such cases, the consent of the data subject is necessary for participation in the Event and failure to sign the consent form will prevent the participant from completing the registration.

Data controller: Association ‘Città di Trento – Associazione sportiva dilettantistica’ with registered office in Trento (TN), v.le Verona, 167/2, 38123, Tax Code 01573950225, (hereinafter also referred to as the ‘Association’ or ‘Organizer’) in the person of its Legal Representative, Mr. Gianni Valler, with elected domicile at the registered office of the Association, email address: info@trentorunningfestival.it

2) Data processing purposes

The use of the above personal data is inherent in the sporting and public nature of the Event, its organizational requirements, and the provision of services to participants.

The Organizer uses and processes the data, also through its technical and service partners and affiliated companies, for the following purposes: the verification of participation requirements; timing and tracking services; medical assistance services; photo and video services for the media and participants (including for a fee); communications to sporting and public authorities; reporting and documentation of the Event; promotion and commercial exploitation of the Event.



The conditions for processing are therefore as follows:

- (i) provision of services related to the registration of participants in the Event and the regular conduct of the Event (for example, in the case of participant registration management, timekeeping and publication of results, or making photos and videos of the Event available to participants);
- (ii) consent of the data subject (for example, in the case of the processing of health data or for marketing purposes, as specified below);
- (iii) pursuit of the legitimate interests of the Organizer and its commercial partners (for example, in the case of the publication of images and results to document the Event);
- (iv) compliance with legal obligations (for example, in the case of communications required by public authorities);
- (v) safeguarding the vital interests of the data subject (for example, if medical assistance is required during the Event).

The Organizer draws the attention of all participants to the fact that during the Event, video recordings and photographs of participants will be taken, both in motion and posing; based on the above conditions (in particular, (i) and (iii)), the Organizer may use, or allow the sponsors and technical and service partners of the Event, to use these images for the following purposes: reporting and documentation of the Event;

- a) delivery and transfer of photographic and video services of the Event, free of charge or for a fee, of the photos and videos themselves, exclusively for private use, to all participants and people authorized by them;
- b) authorization for the recording of one's image in the context of the Event is a necessary requirement for participation in the Event itself, insofar as the procedures for conducting the Event, as described in the Internal Regulations, provide for video and photographic recording of the Event for documentation purposes, and the consequent offer to all participants of services for the acquisition or purchase of photos and videos of the Event; therefore, failure to authorize the use of one's image for the aforementioned purposes, as requested in the Release Form, will make it impossible to register for the Event.

3) Use and dissemination of participants' images

The Organizer informs participants that, as already highlighted in point (2) of this document, the Event is organized and managed with the help of technical and commercial partners, and with the support of sponsors. The services provided by these partners may include registration services, tracking services, timing services, photography and video services, services for checking and validating participation requirements, and any other services. Some of these services may require or presuppose the registration of the data subject on the platform of the partner acting as an external Data Processor, or in any case processing carried out by the partner in its capacity as an independent Data Controller; in such cases (with specific reference to the Data Controller status of the Organizer's partner), the data subject is warmly invited to carefully read the privacy policy provided by the partner itself.



This individual may request a list of partners and sponsors at any time by writing to the Organizer, unless the Organizer provides specific information in the privacy policy document.

For participants with their own ENDU profile (i.e. individuals registered with ENDU, a platform managed by Engagigo S.r.l.), the Organizer shall communicate the data to Engagigo without delay and in accordance with the principle of data portability, if these participants have requested Engagigo to acquire the data processed by the Organizer (in particular, data relating to event registrations, as well as copies of documents relating to certificates of fitness for sports and membership cards) from the Organizer operating through ENDU.

The data subject may view Engagigo's privacy policy on its website (endu.net) and exercise their rights directly with that company, which will act, in this case, as the Data Controller of the data acquired.

Given the public nature and purpose of the Event, participants also acknowledge and accept that data relating to their image, their times and results, or their real-time position, where specific tracking services are active, may be made publicly available through dissemination on the websites of the Organizer, sponsors and service partners of the Event and/or communicated to third parties for the purposes of reporting, documentation and promotion of the Event itself, for the provision of specific services related to the Event, such as the sale of video and photographic services. The data may also be processed, as provided for in points (iv) and (v) of paragraph (2), in compliance with specific legal or regulatory obligations and for the protection of the vital interests of participants (e.g. communication to competent authorities and rescue personnel for rescue operations and/or the provision of medical assistance services within the Event).

4) Consent for the advertising use of the participant's image

In addition to the video recordings and photographs referred to in the previous points, with the specific and free consent of the interested party, the Organizer may use recordings that include their image for the promotion of the Event and other events organized by the same Organizer. The data subject may revoke this consent at any time by writing to the Organizer by registered letter with return receipt or by email to: info@trentorunningfestival.it

5) Processing for marketing purposes

In case participants use their email address to register for the Event, the Organizer may use this address, without the participant's prior consent, to send them, including through its service partners, commercial communications relating to its products and services connected with the Event, or in any case to other initiatives and events similar to the Event itself. The data subject may object to the sending of such communications at any time by writing to the Organizer or by following the specific instructions for discontinuing communications contained in each communication.

Without prejudice to the above, with the prior, specific, and free consent of the data subject, which may be revoked at any time, the Organizer may, either directly or through its service partners to:

a) use participants' contact details (e-mail, address and telephone number) for commercial information purposes, market research, surveys, direct offers of its own products and services and/or products and services of its service and commercial partners, through traditional methods (i.e. paper mail, telephone calls



via operator, etc.) and automated communication tools (i.e. pre-recorded telephone calls, emails, faxes, text messages, multimedia messages, apps, etc.);

b) disclose to certain categories of third parties (in particular, the Event sponsors and other companies that provide products and services related to the organization of the Event and, more generally, to the world of sports activities) the contact details of participants (email, address, and telephone number) for commercial information, market research, surveys, direct offers of their products and services carried out through traditional methods (i.e. paper mail, telephone calls via operator, etc.) and automated communication tools (i.e. pre-recorded telephone calls, emails, faxes, text messages, multimedia messages, apps, etc.). These third parties will act from time to time as independent Data Controllers, with the consequent obligation to provide the data subject with their privacy policy in accordance with the law.

The Organizer, its commercial partners, or any third party to whom the individual's data has been communicated or disclosed may carry out profiling or automated decision-making operations. The data subject may interrupt communications with the relevant entity at any time by making a declaration using the same method of communication (or by sending a registered letter with proof of delivery), or by following the instructions indicated in each communication.

6) Data storage and Data Processors

The individual's data will be stored in the Organizer's computer archives and protected by appropriate security measures in line with the provisions of Article 32 of the EU Regulation 2016/679.

The data will be stored for the time necessary in relation to the purposes for which it was collected, and possibly for a further period if the storage of the data is necessary for the protection of a right of the Organizer, the data subject, or a third party.

In particular, data related to registration for the Event will be stored for ten years, also in consideration of possible complaints by the data subject within the ordinary ten-year limitation period; data relating to the results of the Event will be stored for as long as there is a current interest in the documentation of the Event itself; contact details for sending commercial communications will be retained for as long as the individual does not exercise their right to object or withdraw their previously given consent; data relating to the image of participants will be retained for as long as the Organizer can legitimately dispose of the recordings of the Event.

For storage and processing purposes, the Organizer may use third parties, who will be appointed as external Data Processors by the Organizer pursuant to Article 28 of the EU Regulation 679/2016, provided that the legal requirements are met. Individuals can obtain a complete list of Data Processors appointed by the Organizer from time to time by sending a request using the contact details and methods indicated above.

The Organizer may also use, for the purposes of processing the data provided by the data subject, people operating within its organization as Data Processors, as per Article 4, paragraph 1, no. 10 of the GDPR.



7) Transfer of data outside the EU

In the case of international data transfers from the European Economic Area (EEA) to a non-EEA country recognized by the European Commission as having an adequate level of data protection, the data subject's data may be transferred on that basis.

For transfers to countries outside the EEA whose level of protection has not been recognized by the European Commission, the Organizer will implement one of the following measures to ensure the protection of the data:

- standard contractual clauses approved by the European Commission;
- binding corporate rules, where applicable.

You may send a written request to the Organizer, using the means and methods indicated above, to obtain a copy of these measures or details of where they are available.

8) Minors

Minors may only be registered for events by individuals with parental or legal authority over them. By registering a minor, the relevant person must authorize the taking of photographs and videos of the minor during the event for the purposes described in this general policy and the specific policy, which requires specific and express consent.

They may exercise the rights specified in Article 9 below regarding the minor's personal data.

The Organizer does not process the minor's data for marketing purposes or directly offers products and services. However, the Organizer may process the data of the person with parental or legal authority for these purposes, provided that they have received a specific information document regarding the processing of their personal data and have given their consent, as indicated in point (5) above. This person retains the right to object to the continued processing of their data for these purposes using the methods indicated in point (5) of this document.



9) Rights of the data subject

At any time, the participant may exercise their rights regarding the processing of personal data pursuant to Articles 15–22 of GDPR 2016/679. These rights include:

Access: the data subject may obtain information about the processing of their data and a copy of such data;

Rectification: where the data subject believes that their data is inaccurate or incomplete, they may request that such data be amended accordingly;

Erase: the data subject may request the deletion of the data if they withdraw their previous consent and there is no other legal basis for the processing, or in other cases provided for by law;

Restriction: in the cases provided by law (e.g.: the data subject contests the lawfulness of the processing or the accuracy of the data), the data subject may obtain a restriction of the processing without the data being deleted;

Objection: the data subject may object to the processing of their data where the processing is based on the Organizer's legitimate interest, for reasons related to their particular situation, unless there are compelling grounds for which the Organizer's interests prevail over the data subject's rights (for example, where the processing is necessary to defend the Organizer's rights in legal proceedings);

Withdrawal of consent: the data subject may withdraw the consent previously given for the purposes of the processing. Under the conditions set out in this document, if the data subject withdraws consent prior to participation in the Event, they will not be able to take part in the Event, unless such withdrawal is due to legally mandated circumstances.

The data subject may, at any time, object to the processing of their data for marketing purposes and withdraw any consent previously given for such purposes by following the procedure and instructions indicated in each commercial communication.

The participant acknowledges that their objection to, or withdrawal of consent or authorization for, the use of images depicting them will have effect only to the extent that it is possible to prevent the publication of such images using reasonable means and at reasonable cost. Such objection or withdrawal shall not affect the lawfulness of any use already carried out.

The above rights may be exercised by sending a written communication to the Organizer at the following address: info@trentorunningfestival.it

(or by equivalent means, such as registered mail with return receipt).

In accordance with applicable law, in addition to the rights set out above, the data subject also has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali).