



## **PRIVACY POLICY FOR THE PROCESSING OF PERSONAL DATA ON THE CYCERONE PLATFORM**

Talent Garden Italia S.r.l., Piazza Città di Lombardia, 1, 20124 Milan (MI), Italy, VAT number 03249821202 (hereinafter "Data Controller"), in its capacity as Data Controller, informs you pursuant to EU Regulation 2016/679 ("GDPR") and applicable personal data protection laws that your data, within the framework of the "Cycerone" platform (hereinafter "Platform"), will be processed as described below for the specified purposes.

Unless otherwise stated, this privacy notice applies to personal data processed in connection with the use of the Platform. It is understood that for data processing carried out for purposes other than those indicated below, the relevant privacy notices of the services concerned will apply.

### **1. TYPES OF DATA PROCESSED**

We collect and store the following categories of personal data:

- Common data collected from users during Platform use, including but not limited to: full name, phone number, email address, browsing data (such as IP address and session ID), data necessary for account registration.

### **2. PURPOSES AND LEGAL BASES OF THE PROCESSING**

Personal data are processed for the following purposes and legal bases:

- To fulfill contractual and pre-contractual obligations under Art. 6(1)(b) GDPR, specifically for:
  - Creating and managing user accounts on the Platform;
  - Enabling the user to use the Platform, including technical management and operational functionalities;
  - Sharing data with commercial partners of the Cycerone project, funded by the European Union, acting as independent data controllers, for the purpose of managing participation in training courses (including application, selection and organization) offered by the selected partner;
  - Managing, processing, and responding to users' requests for information and assistance regarding the Cycerone project and its related activities.
- Only with the user's explicit consent under Art. 6(1)(a) GDPR, Talent Garden will process your data to:
  - Send newsletter and communications related to Cycerone project via newsletters to which the user has voluntarily subscribed;
  - Share data with commercial partners of the Cycerone project, funded by the European Union, for the purpose of receiving newsletters and communications related to the project.
- To comply with legal, regulatory, national, or EU obligations or orders from competent authorities under Art. 6(1)(c) GDPR;
- To pursue a legitimate interest of the Data Controller under Art. 6(1)(f) GDPR, including:
  - Exercising or defending a right in court or before an authority;
  - Managing and maintaining the Platform and its functions to ensure proper operation, improve service quality, and optimize Platform functionality;
  - Preventing and detecting fraudulent or harmful activities against the Platform.



### **3. METHODS OF PROCESSING**

Data processing is carried out by electronic and paper means, minimizing risks of destruction, loss (including accidental), unauthorized access/use, or incompatible use with the original collection purpose. This is achieved through technical and organizational security measures implemented by the Data Controller.

### **4. DATA RETENTION**

Talent Garden retains your data for the minimum time necessary to achieve the purposes described above, and specifically:

- For the fulfillment of contractual and pre-contractual obligations, data are kept for the contract duration and subsequently for 10 years from contract termination;
- For periods required by applicable laws concerning legal obligations of the Data Controller.

After these periods, data will be destroyed or anonymized.

### **5. DATA PROVISION**

In the context of using the Platform, providing personal data:

- Is mandatory for contractual and pre-contractual obligations related to the Platform use. These data are necessary for the relationship with the Data Controller and the use of the services. The user may refuse to provide personal data; however, without such data, access to services will not be possible;
- Is mandatory for fulfilling legal obligations of the Data Controller;
- Is optional for processing based on your consent. Refusal to provide data for these purposes will not affect access to the Data Controller's services but will prevent you from receiving updates and informational content.

### **6. DATA DISCLOSURE**

Your data may be accessible to:

- Authorized individuals trained and bound by contract or law to confidentiality, such as employees, collaborators, processors, managers, and system administrators;
- Talent Garden group companies and third parties necessary for contract execution (e.g., IT, banking, insurance, accounting, tax, legal service providers), acting either as processors or independent controllers as applicable;
- As described above, partners participating in the EU-funded Cycerone project, acting as independent data controllers;
- Public organizations and Authorities as required or permitted by law or for legal defense or enforcement purposes.

Your data will not be disclosed to unspecified third parties, except where consented by you or required by law enforcement, judicial authorities, intelligence and security agencies, or other public entities for state security or crime prevention.

### **7. DATA TRANSFER**

Data processing may take place outside the European Economic Area (EEA).

The Data Controller ensures that any data transfer to non-EEA countries complies with Articles 44 and following of the GDPR. Transfers will only occur to countries recognized by the European Commission as providing adequate protection or under appropriate safeguards such as standard contractual clauses.

### **8. RIGHTS OF THE DATA SUBJECT**



As a data subject, you have the right to request from Talent Garden:

- Access: to view and obtain a copy of your data, unless this infringes on others' rights and freedoms;
- Rectification: to correct incomplete or inaccurate data;
- Erasure: to delete data where applicable, except where exclusions apply under Art. 17(3) GDPR;
- Restriction: to limit processing where applicable, subject to exclusions under Art. 18(2) GDPR;
- Portability: to receive data in a structured, common, and machine-readable format to transmit to another controller, where processing is based on consent or contract and technically feasible;
- Complaint: to file a complaint with the Data Protection Authority (in Italy, [www.garanteprivacy.it](http://www.garanteprivacy.it)) or the authority in your EU country of residence or work, or where the violation occurred.

You also have the right to withdraw consent at any time without affecting the lawfulness of processing based on prior consent.

Where data are processed based on legitimate interest, you may object to processing on grounds related to your situation, unless overriding legitimate grounds apply, or processing is necessary for legal claims. You may also object to direct marketing processing without providing reasons.

Exercise of rights may be limited or excluded as provided by applicable law.

## 9. HOW TO EXERCISE YOUR RIGHTS

You can exercise your rights at any time by:

- Sending a registered letter to the Data Controller's address;
- Sending an email to [privacy@talentgarden.com](mailto:privacy@talentgarden.com)
- Sending an e-mail to our Data Protection Officer (DPO) at the following address: [dpo@talentgarden.com](mailto:dpo@talentgarden.com)