

Privacy Policy Statement

Protection of privacy and fundamental rights of people and their private sphere.

Index

1. Privacy Policy Statement
 1. Foreword
 2. Information pursuant to art. 13 of legislative decree no. 196/2003 (Italian Personal Data Protection Code)
 3. Consultation, modification and cancellation of personal data – rights in art. 7, legislative decree no. 196/2003
 4. Third parties in charge of data processing
 5. Third parties to whom your personal data can be communicated
 6. What cookies are and how APG23 uses them
 7. Credit card security
 8. Security of your personal data

Foreword

The *Comunità Papa Giovanni XXIII* Association (hereafter referred to as 'APG23' or 'the Community') is particularly mindful of the protection of privacy and fundamental rights of people and their private sphere. Since the Internet is a potentially risky means of circulating personal data, APG23 assumes the responsibility of strictly following the code of conduct in the collection and processing of personal data, in compliance with the laws stipulated in legislative decree dated 30 June 2003, no. 196 (“Italian Personal Data Protection Code”) – in order to guarantee a safe, controlled and confidential means of online browsing.

The laws pertaining to the protection and confidentiality of information may be revised from time to time. For this reason, you are kindly requested to read this section periodically, in order to be informed of the updates in our privacy policy, as modifications may be made in order to maintain and guarantee the highest level of service to our website users.

Basic principles of APG23’s privacy policy

1. to process data exclusively for the specified purposes and according to the information presented to users every time they access a section of the website where personal data entry is required;
2. to use solely data sent voluntarily by the user;
3. to make personal data available to third parties exclusively for carrying out purposes according to the specific requirements carefully selected by us for the proper functioning of the service;
4. to inform users if their data is disclosed to third parties for the proper functioning the requested services, or if it is required by law, regulation or community legislation to disclose personal data to a third party;
5. to disclose data to associations linked to us (specifically, *Condivisione fra i Popoli*, NGO supported by APG23), only if the user has given his/her explicit consent;
6. to respond to requests of cancellation, modification or integration of personal data supplied to us, and to the objection of data processing on illegitimate grounds or to the objection of

the processing of data for purposes of advertising about our projects and requests for financial contributions in support of our institutional activities;

7. to guarantee the proper and lawful processing of data, protecting of users' privacy, and taking adequate security measures to protect the confidentiality, integrity and availability of personal data.

Information pursuant to art. 13 of legislative decree no. 196/2003

As detailed in the sections of the website offering the possibility of signing up for our services, after having entered the required data, your personal data is used exclusively to respond to your expressed voluntary requests. In particular, the collection – and subsequent processing – of personal data are carried out to achieve APG23's institutional goals, specifically for the following purposes:

1. to respond to requests for information on on-going and future activities, projects and initiatives
2. to respond to requests for products by SEMPRE Comunicazione
3. to manage contributions and donations made towards our projects
4. to manage donations made by credit card payment

The application forms require compulsory information, generally marked with an asterisk (*), which is necessary for the proper processing of your request. Information in non-compulsory fields is not required and if left blank, will not annul the operation.

Data collected through this website is processed either by paper, electronic or telematic means, according to the purpose for which the data is collected and in compliance with the current security laws, for achieving the specific aims defined in the privacy statement provided to the user each time the user is requested for personal data.

The Community will not use data entered for purposes other than those applicable to the service requested by users. It will use personal data only within the time frame defined in the privacy statement each time the user is requested for personal data.

Personal data will be made available to third parties for purposes related to the proper functioning of the service requested; these third parties will act as independent data controllers for the supply of instrumental services to satisfy the users' requests (e.g. companies that produce and supply information material requested by the user) or where disclosing of data is necessary in compliance with laws and regulations. Data will not be disseminated or transferred abroad.

Only if the user has given his/her express consent, can data be disclosed to *Condivisione fra i Popoli*, a NGO (Non Governmental Organisation) supported by APG23, which requires personal data for conveying information on their projects and initiatives.

Personal data supplied by a donor is also required for sending him/her information material on news about projects, institutional activities and humanitarian aids carried out in countries where the Community is active. The data will also be used for fundraising campaigns to support institutional activities.

Material on “social advertising” is sent to users only if they have specifically requested it or have given their consent to receive it.

Personal data will be made available to persons specifically authorised by the Community appointed in charge of data processing, to carry out necessary processes for the above mentioned purposes. The group of persons in charge of data processing are defined each time in the privacy statement. In general, they are in charge of specific services, such as administration and management of information services, relations with existing and potential donors, relations with organisers in charge of information campaigns on our projects and of “social advertising” for our humanitarian initiatives.

The *Comunità Papa Giovanni XXIII* Association – with a registered office in Via Mameli 1, 47921 Rimini (RN – Italy) – is the data controller, according to the legislative decree no. 196 dated 30 June 2003. The effects of this law states that, upon informing the user of his/her rights in the privacy statement, the data controller can decide on the reasons for and means of data collection and on how the personal data given by the user will subsequently be used. The Community can also decide on the means used for data processing and the security measures to be followed in order to guarantee its integrity, confidentiality and availability.

APG23 guarantees to respect all the rights stipulated in art. 7 of legislative decree no. 196/2003, which allow the user to cancel, modify, correct or integrate data that has been voluntarily given by them, as well as to request that it be blocked or transformed into anonymous form, or to object its processing if carried out on illegitimate grounds or in the case the user does not wish to receive “social advertising” from APG23. The user has the right to have access to information on the processing of his/her data also after having provided it to the data controller.

Consultation, modification and cancellation of personal data – rights in art. 7, legislative decree no. 196/2003

APG23 informs the user that he/she can exercise the rights stipulated in art. 7, legislative decree no. 196/2003 at any time by sending an e-mail to privacy@apg23.org (alternatively, by writing to: Via Mameli 1, 47921 Rimini – RN – Italy). Following is the main extract from the article. The user has the right to:

1. obtain confirmation of the existence of his/her personal data in the data bank, request and get written and complete information about it and its origin, about the logic followed in processing it and the purpose for which it is processed, in the case it is processed electronically. The user’s request can be re-submitted, for justifiable reasons, at an interval of no less than 90 days;
2. obtain the cancellation, transformation into anonymous form and block of data processed unlawfully;
3. obtain updates, rectifications or, if requested, integrations of data;
4. fully or partly object, on legitimate grounds, to the processing of his/her personal data;
5. object to the processing of personal data for the purpose of sending advertising material and interactive information.

Third parties in charge of data processing

Personal data can be processed either manually, electronically or through telematic means, directly by APG23 and by third parties which are adequately experienced, technically capable, professional and reliable in carrying out data processing on behalf of the Community, for the purpose of supplying improved website services and to guarantee the highest level of user satisfaction, while keeping in full compliance with the security and confidentiality of users' personal information. These third parties include, for example, companies responsible for printing and supplying "social advertisements", which are mailed out to donors.

The complete and updated list of third parties in charge of data processing can be requested at privacy@apg23.org, or at the mailing address mentioned in the paragraph above.

Third parties to whom personal data can be disclosed

User's data can be made available to third parties and independent data controllers, for purposes related to the proper functioning of the website services or in compliance with laws and regulations which require its disclosure, or according to requests made by law from controlling authorities. As previously mentioned in the paragraph on Information pursuant to art. 13 of legislative decree no. 196/2003, data can be disclosed, with the user's specific consent, to *Condivisione fra i Popoli* for their own institutional activities and "social advertising".

What cookies are and how APG23 uses them

Cookies are information sent to your computer from a web server which is saved on the hard disk of your computer and sent back to the web server by your browser. This information concerns your use of the website and makes it possible for the server to keep track of the services you access, the websites you visit, and the options you chose while browsing online.

This information is not given voluntarily or directly by the user, but rather, it tracks the user's navigation path on the web.

To this end, the Community wants to point out that data acquired through cookies is used exclusively for technical purposes, in order to guarantee efficient, friendly and faster access to the website and its services, and to ensure easier navigation for the single user. This information will never be used to create users' profiles on the basis of his/her selections or by tracking his/her navigation through this website or while browsing the web.

Credit card security

Online donations require identification and details of the credit card and its owner. APG23 would like to highlight that it will not have any access to this information, as at the time of transaction,

credit card details (number, expiry date, owner's personal details) are collected directly by the card issuer and by Banca Sella (which is involved in the processing of this information).

Hence, the protection, processing and security measures pertaining to credit card information are defined by the financial institutions responsible for issuing the card and by Banca Sella.

We also want to stress that the Community is not responsible for unauthorised or fraudulent use of the user's credit card details by third parties.

Security of personal data

APG23 takes appropriate and preventive security measures to protect the confidentiality, integrity and availability of personal data. As stipulated by the regulations governing the privacy of personal data, certain technical, logistic and organisational devices are put into effect with the aim of preventing damages, losses (including accidental loss), alterations, improper and unauthorised use of personal data. Similar preventive security measures are adopted by third parties (data processors) which the Community entrusts for the processing of personal data on its behalf.

Furthermore, the Community is not responsible for false information sent directly by the users (e.g. incorrect e-mail address, mailing address or other details), nor is it responsible for incorrect or misinformed user information from third parties, either accidentally or with fraudulent intentions.