

**INFORMATIVE EX ART 13 D.LGS. 196/2003 AND DECLARATION OF CONSENT EX ART. 23 and 26 OF D. LGS. 196/2003 AND PURSUANT TO REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 24/04/2016**

This is to inform you that the Italian Legislative Decree. 196 of 30 June 2003 (Code regarding the protection of personal data) and the EU Regulation 2016/679 of the European Parliament and of the Council of 27/04/2016 (General Regulation on Data Protection) provides for the protection of persons and other subjects regarding the processing of personal data.

L 'Institute of Gestalt Human Communication Center Italy, headquartered in Syracuse, Via San Sebastiano 38 (the "Institute") in its legal representative pro tempore domiciled for the office at the Institute, is committed to protect the online privacy of its users. This document will allow you to know our privacy policy, as the Personal Information is managed when you use our services and to allow you, if you wish, to consent to the processing of your personal data expressed and aware in the sections of the site where it is requested to provide personal data.

According to the law, this treatment will be based on principles of correctness, lawfulness, transparency , accountability, limitation of purposes and retention, minimization of data, accuracy, integrity and protection of your privacy and your rights. Pursuant to art. 13 of Legislative Decree 196/2003 and of the art. 13 of EU Regulation 2016/679 , therefore, we provide you with the following information:

1. The personal data you provide to the Institute will be processed, according to the institutional aims of the Institute, within the legislative and regulatory provisions in the field of education and training for the performance of administrative, tax and insurance as well as advertising. The processing may also include personal data included in the list of sensitive data, within the limits indicated by the General Authorization of the Guarantor. If, on the other hand, you provide the Institute with personal data from other third parties involved in the processing, you are independent as the data controller, assuming all the obligations and responsibilities of the law. In this sense, you confer on the point the widest indemnity with respect to any dispute, claim, request for compensation for damage from treatment, etc. that it should reach the Institute from third parties whose personal data have been processed through its use of the Services in violation and the rules on the protection of personal data applicable. In any case, if you provide or otherwise treat Personal Data of third parties in the use of the Service, guarantee from now - assuming all related liability - that this particular ipotes of treatment is based on a ' suitable legal basis under the 'art. 6 of EU Regulation 2016/679 which legitimizes the processing of the information in question.

2. The treatment can be carried out with paper and electronic means. For processing personal data we mean any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as collection, registration, organization, structuring, storage , adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of making available, comparison or interconnection, limitation, cancellation or destruction. We inform you that the personal data processed will be constituted - also depending on your decisions on how to use the Services - by an identifier such as the name, the email address, an identification number, location data, an online ID , the purchases made, and other data suitable to make it identifiable or identifiable, depending on the type of Services requested (hereinafter only " Personal Data "). in particular, the Personal Data processed through the Website are as follows:

a. Navigation data. The computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified interested parties, but which by their very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of the computers used by users who connect to the Site, the addresses in the Uniform Resource Identifier (URI) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (success, error, etc.) and other parameters related to the operating system and the user's computer environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to check its correct functioning, to identify anomalies and / or abuses. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site or third parties .

b. Traffic data. Within the services offered, the IT systems and software procedures used to operate the Website it is not acquire, during their normal operation, some personal data necessary for the provision of contractually agreed services. This is information that is collected to be associated with interested parties in order to issue a certificate of attendance or a tax document required by the current ordering, etc.

c. Cookies. Cookies are small text files that the sites visited by the user send and record on his computer or mobile device, to be then re-transmitted to the same sites at the next visit. Thanks to cookies, a site remembers the

user's actions and preferences (such as login data, the chosen language, font size, other display settings, etc.) so that they do not have to be re-indicated when the user returns to visit said site or browse from one page to another. Cookies, therefore, are used to perform computer authentication, monitoring sessions and storing information regarding the activities of users accessing a site and may also contain a unique identification code that allows you to track the user's navigation inside of the site itself for statistical or advertising purposes. During navigation on a site, the user can also receive on his computer or mobile device cookies of websites or web servers other than the one he is visiting (so-called "third-party" cookies). Some operations could not be performed without the use of cookies, which in some cases are therefore technically necessary for the same functioning of the site. There are various types of cookies, depending on their characteristics and functions, and these can remain in the user's computer or mobile device for different periods of time: cd session cookies, which is automatically deleted when the browser is closed; cd persistent cookies, which remain on the user's equipment until a predetermined deadline. According to the legislation in force in Italy, the user's express consent is not always required for the use of cookies. In particular, "technical cookies", ie those used for the sole purpose of transmitting a communication over an electronic communications network, or to the extent strictly necessary to provide a service explicitly requested by the user, do not require such consent. In other words, these are cookies that are essential for the operation of the site or necessary to perform activities requested by the user. Among technical cookies, which do not require an express consent for their use, the Italian Data Protection Authority (see Determination of the simplified procedures for information and the acquisition of consent for the use of cookies 'May 8, 2014, hereinafter only "Ruling") also includes:

- i. "cookie analytics" when used directly by the site operator to collect information, in aggregate form, on the number of users and how they visit the site,
- ii. browsing or session cookies (to authenticate),
- iii. functional cookies, which allow the user to navigate according to a series of selected criteria (for example, the language, the products selected for purchase) in order to improve the service provided.
- iv. For "profiling cookies", vice versa, ie those aimed at creating profiles related to the user and used to send advertising messages in line with the preferences expressed by the same in the context of surfing the net, a prior consent of the user is required. user.

The Website uses the following cookies that can be de-selected, except for third-party cookies for which you must refer directly to the relative methods of selection and de-selection of the respective cookies, indicated by means of links: Technical cookies - navigation or session and strictly necessary for the functioning of the Site or to allow the user to take advantage of the contents and services requested by them; Analytics cookies, which allow us to understand how the site is used by users. With these cookies we do not collect information about the user's identity or any personal data. The information is processed in an aggregate and anonymous form; functionality cookies, that is used to activate specific functions of the Site and a series of selected criteria (for example, the language, the products selected for purchase) in order to improve the service rendered .

3. The provision of data is mandatory, to the extent that it is necessary for the fulfillment of the institutional and contractual obligations by the Institute of Gestalt; any refusal to provide such data could result in failure or partial execution of the contract.
4. The treatment we intend to carry out, with its specific consent where necessary, has the following purposes:
  - a. Allow the provision of the Services requested by you and the subsequent and independent management of your profile , which will be accessed by registering and creating your account when providing the Services, including the collection, storage and processing of data purposes of the establishment and subsequent operational, technical and administrative management of the relationship connected to the provision of the Services and the making of communications relating to the conduct of the relationship established;
  - b. allow browsing and browsing of the website pages
  - c. respond to requests for assistance or information, which we will receive via e-mail, telephone or chat through the "Contact Us" page of our Site. With particular reference to the answers to requests for assistance received through the telephone, we inform you that calls may be registered with your express consent
  - d. fulfill legal, accounting and tax obligations ;
  - e. carry out direct e-mail marketing for services similar to those signed by you, unless you have opposed such processing initially or on subsequent communications, for the pursuit of the Institute's legitimate interest in promoting products or services you may reasonably be interested in;

f. to elaborate studies, researches, market statistics; send advertising material, information, commercial information or surveys to improve the service ("customer satisfaction") via e-mail and / or through the use of the telephone with operator and / or through the official pages of the Institute or on social media network;

g. only with reference to certain services, the data may be processed for the purpose of communication to third parties for their marketing purposes of third parties, ie to provide information and / or make offers on products, services or initiatives offered or promoted by affiliated and / or controlled companies, and / or by other commercial partners and outsourcers acting as independent data controllers;

h. make personalized business proposals based on the products or services you have purchased, or about which you are interested in browsing our Website, or on the basis of the group of customers you belong to (profiling). Finally, if you are taking advantage of a service, based on its use of the service will receive communications targeted by the Institute (for example, if service capacity is reaching the limit, you will be notified and invited to increase the capacity of the service itself, or will be offered complementary services and / or compatible with the one you purchased). This type of analysis is typically carried out on purchase data relating to both individuals and legal entities and the related decisions are not based on a solely automated treatment. This treatment is necessary for the pursuit of the legitimate interest of the data controller to customize their business proposals. You can always oppose this treatment by contacting us via the "contact" web page.

i. for exclusive purposes of security and prevention of fraudulent conduct, the Controller establishes an automatic control system that involves the detection and analysis of user behavior on the site associated with the processing of Personal Data including the IP address. The consequences of this treatment are that if a person attempts to carry out fraudulent conduct on the Site for example to benefit several times from the same promotion without having the right, the Institute reserves the right to exclude this subject from the promotion or to adopt any other appropriate measure for its protection.

5. The legal basis of the processing of Personal Data for the purposes set out in Section 4 (abc) is art. 6 (1) (b) of EU Regulation 2016/679 as the treatments are necessary for the provision of the contracted services. The provision of Personal Data for these purposes is optional but failure to provide it would make it impossible to activate the required Services. The purpose of section 4 (d) represents a legitimate processing of Personal Data pursuant to art. 6 (1) (c) of EU Regulation 2016/679. Once the Personal Data has been provided, the processing may indeed be necessary to comply with the obligations of the law to which the Institute is subject. The processing performed for marketing purposes described in section 4 (f) and for communication to third parties described in section 4 (g) are based on the release of your consent pursuant to art. 6 (1) (a) of EU Regulation 2016/679. The provision of your Personal Data for these purposes is entirely optional and does not affect the use of the Services. The treatments referred to in section 4 (e), carried out for the purpose of e-mail marketing on products or services similar to those purchased by you, find instead its legal basis, pursuant to art. 6 (1) (f) of EU Regulation 2016/679, in the legitimate interest of the Institute to promote its products or services in a context in which the interested party can reasonably expect this type of treatment, to which he can also oppose any time. In fact, if you wish to oppose the processing of your data for marketing purposes, referred to in sections 4 (e) and 4 (f), you may at any time contact the Institute at the addresses on the web page "contacts". The pre-ventilation treatment referred to in section 4 (h), to which you can object at any time, is based on the legitimate interest of the Data Controller, pursuant to Article 6 (1) (f) of EU Regulation 2016/679, to personalize their commercial communications. The treatment referred to in section 4 (i) is also based on the legitimate interest of the owner to detect frauds and frauds committed against him, in accordance with art. 6 (1) (f) of EU Regulation 2016/679.

6. The Institute is authorized to communicate personal and sensitive data to public entities, in the cases provided for by the laws and regulations for the fulfillment of the respective institutional purposes, as well as to those public and private subjects whose communication is necessary for the proper fulfillment of the purposes indicated in point 1. The Institute is also authorized to process and communicate personal data for purposes of commercial promotion and market analysis, aimed at improving the service offered or making known the new training services.

7. Any video and photographic recordings made during the training activities will be adequately kept in paper or electronic form at the premises of the Institute and will have access only to the staff in charge, according to the directives of Legislative Decree No. 196/03 and subsequent decree. The Institute is authorized, for the pursuit of the purposes indicated in point 1 of this information and / or for purely promotional purposes, to negotiate, use and publish such images. It is expressly excluded any use that may in any way prejudice the personal dignity and the dignity of the subjects taken back.

8. At any time you can exercise your rights towards the data controller pursuant to articles. 7 and 13 of Legislative Decree 196/2003, which, first of all, the right to obtain at any time the confirmation of the existence or otherwise of the same data, the right to know its content and origin, verify its accuracy or request the integration or updating, or correction, the right to request cancellation, transformation into anonymous form or blocking of data processed in violation of the law, and to oppose in any case, for legitimate reasons, to their treatment.

9. The data controller is the Institute of Gestalt-HCC Human Communication Center Italy, with registered office in Syracuse, Via San Sebastiano 38 in person of the legal representative pro tempore domiciled for the office at the Institute.

10. Recipients of personal data. Your Personal Data may be shared for the purposes set out in Section 4

a.subjects that typically act as data controllers, that is: i) people, companies or professional firms that provide assistance and advice to the Institute in accounting, administrative, legal, tax, financial and debt collection with regard to the disbursement of Services; ii) persons with whom it is necessary interact and for the provision of services, for example Agencies, the subjects that provide services pag catkin, etc. iii) or subjects delegated to perform technical maintenance activities (including maintenance of network equipment and electronic communications networks); iv) companies affiliated to the Institute for administrative or statistical purposes (collectively "Recipients");

b. subjects, bodies or authorities that are obliged to communicate their personal data under the provisions of the authorities or orders of the authorities, for example, in the course of criminal investigations, the Institute may receive requests from the judicial authorities of provide information about its users;

c. people authorized by the Institute to the processing of Personal Information necessary to carry out activities strictly related to the provision of services, which have committed to confidentiality or have adequate legal duty of confidentiality, as the Institute's employees and associates them;

11. Transfers of personal data. Some of his Personal Data are shared with Recipients that could be found outside the European Economic Area. The Institute ensures that its Personal Data is processed by these Recipients in compliance with EU Regulation 2016/679. Indeed, transfers can be based on an adequacy decision or on the Standard Contractual Clauses approved by the European Commission.

12. Data retention. The Personal Data processed for the purposes set out in section 4 (abc) will be kept for the time strictly necessary to achieve those same purposes. In any case, since these are treatments carried out for the provision of Services, the Institute will process Personal Data up to the time allowed by Italian legislation to protect its own interests (Article 2946 of the Italian Civil Code). Personal Data processed for the purposes set out in Section 4 (d) will be retained until the time required by the specific obligation or applicable law. For the purposes set out in section 4 (e) (f), your Personal Data will be processed until your consent is revoked. In any case, the possibility is reserved for the Institute to keep its Personal Data up to the time allowed by Italian law to protect its own interests (Art. 2947 (1) (3) cc).

13. Rights of the interested parties. The I has the right to ask the Institute, at any time, access to his Personal Data, rectify or cancel them or oppose their processing in the cases provided for in Article 20 of the Regulation EU 2016/679, has the right to request the limitation of treatment in the cases provided for by art. 18 of the Regulations EU 2016/679, as well as obtaining, in a structured format, in common use and readable by automatic device, the data concerning it (portability), in the cases provided for by art. 20 of the Rules EU 2016/679. Requests should be sent to the contacts on the "contacts" web page. In any case, you are always entitled to lodge a complaint with the competent supervisory authority (Guarantor for the Protection of Personal Data), pursuant to art. 77 of the Regulations, if it considers that the processing of your data is contrary to the law in force.

14. Changes. This privacy statement is effective from 21 May 2018. The Institute reserves the right to modify or simply update its content, in part or completely, also due to changes in the applicable legislation. If the amendments to this Policy regard substantial changes in the treatments or may have a significant impact on the interested parties, the Institute will take care to notify them to the interested parties.

Acquired the information provided pursuant to Article 13 of Legislative Decree 196/2003 and art. 13 of the Rules EU 2016/679 by accepting this information on the relevant pages of the Institute's website, I express freely, pursuant to articles 23 and 26 of Legislative Decree no.196/2003 and of the 7 of the Regulations EU 2016/679 , my consent as well as the Gestalt Institute - HCC Human Communication Center Italy processes the personal and sensitive data for the purposes indicated in the aforementioned information.

I also express my consent to the communication and dissemination of personal and sensitive data for the purposes and within the scope indicated by the information.

Finally, I express my consent to the processing, use and publication of photographic images and videos taken during the training activities, for the pursuit of the purposes and purposes indicated in points 1 and 7 of this information and in compliance with current legislation in the field.