

## PRIVACY POLICY

This privacy policy was last changed on 25 May 2018.

### Who we are and what we do with your personal data?

FIT CISL, the national transport workers' federation, union based in Rome, Via Antonio Musa n. 4 (hereinafter indicate as **Holder**, on behalf of the **data processing holder**), acting as data processing holder of treatment, takes care of your privacy and protects your personal data from any event which could put them at any violation risk.

The **Holder** implements policy and practice referring to the collection and use of personal data and exercising the rights which are recognized by applicable law. The **Holder** makes sure to update policy and practice adopted for the personal data protection whenever this will be necessary, however in the case of regulatory and organizational changes which may affect the processing of personal data.

The **Holder** has appointed a responsible for data protection (RDP) or a data protection officer (DPO) you can contact for any query on the policy and practices implemented.

You can contact the RPD/DPO to the following address and contact details:

- Protection Trade S.r.l. via G. Morandi 22 Itri 04022 Itri (LT) - Italy
- [dpo\\_fitcisl@protectiontrade.it](mailto:dpo_fitcisl@protectiontrade.it)

### How and why the Holder collect and processes your personal data ?

The **Holder** collects and/or receives the information about you as the following:

- name, last name
- fiscal code
- place and date of birth
- nationality
- gender
- language
- degree
- address & email address
- telephone & mobile contact details
- Family unit
- Information regarding the classification and the place of work/company where you work or the unemployment/ unemployment status
- information relating to the membership and/or your elective charge
- in the eventuality, if necessary, for the performance of the services/practices requested by you, the data relating to your state of health
- the share of your union deduction paid through a single quota
- computer data (regarding your e-mail accounts and or access logs to dedicated platforms)
- social media accounts

Your personal data will be treated for the following purposes:

### 1) the management of the membership relationships as well as the consequent obligations also regulatory

| Purposes  | Legal Basis  |
|---|--|
| - The management of memberships relationships established in all its phases, management of individual and collective claims | Carrying out of activities coming from the membership's affiliation and/or and depending on the provided tasks and in any case provided to be statutory activities |

|  |  |
|--|--|
| <ul style="list-style-type: none"> <li>- The holding of social books, records and books of accounting and tax relevance</li> </ul> | <p>Fulfillment of legal obligations coming from the relationship established, such as, among others, those coming from:</p> <ul style="list-style-type: none"> <li>- Presidential Decree n. 633/1972 and subsequent amendments.</li> </ul> <p>As well as those deriving from the application of:</p> <ul style="list-style-type: none"> <li>- The Confederal Ethic Code</li> <li>- CISL Statute and Regulations and of the <b>Holder</b></li> <li>- Rules on regulatory treatments and on financial compensation for managers elected in the secretariats at all levels of the Organization and for managers of bodies, associations, companies and similar promoted/participated by CISL and/or Federations affiliated to CISL</li> <li>- Regulations for economic and regulatory treatments for the operators/employees/managers in secondment through trade union, companies, associations promoted by CISL and/or CISL affiliated federations.</li> </ul> <p>Fulfilment of the obligation on transparency and economic-associative reporting</p> |
|--|--|

Your data may be communicated/collected also through third parties such as, for example:

- other data officers, e.i. trade union bodies of the **Holder** (national, regional, interregional, territorial);
- CISL offices as well as the bodies, companies, associations promoted and/or linked and/or collateral to CISL and/or CISL affiliated federations by virtue of memberships and participatory relationship
- your employer, as a result of your expressed authorization to join the union, [in the event your employer is resident in Extra-UE countries, to handle any outstanding disputes, your personal data may also be transferred outside the European Union;](#)

- IT service provider;
- communication services internal to CISL organization

and the data concerning you can be obtained by consulting:

- lists hold by public/institutional, insurance, bilateral or equivalent bodies or under the control of the public authority on the basis of specific national legislation.

**2) for the communication to CISL bodies, as well as bodies, companies, associations promoted and/or connected and/or collateral to CISL and/or CISL affiliated federations by virtue of memberships and participatory relationship**

| Purposes   | Legal Basis   |
|--|---|
| <p>communication to third parties such as:</p> <ul style="list-style-type: none"> <li>- the other bodies of the trade union of the <b>Holder</b> for fiscal/administrative/accounting/organizational/legal/statistical purposes</li> <li>- CISL structures as well as bodies, companies, associations promoted and/or connected and/or collateral to CISL virtue of memberships and participatory relationship, for accounting, tax and organizational obligations.</li> <li>- financial administration and public/institutional bodies for legal obligation.</li> <li>- external consultants for accounting and tax matters</li> <li>- legal consultants for disputes management</li> <li>- provider of IT services and HW and SW assistance and maintenance</li> </ul> | <p>Carrying out of statutory activities<br/>           Legitimate interest<br/>           Fulfillment of the obligations provided by the agreement<br/>           Compliance with legal obligations, including those provided by:</p> <ul style="list-style-type: none"> <li>- Presidential Decree n. 633/1972 and subsequent amendments.</li> <li>- Presidential Decree n. 600/1972</li> </ul> <p>As well as those deriving from the application of:</p> <ul style="list-style-type: none"> <li>- CISL Statute and Regulation and of the <b>Holder</b></li> <li>- Confederal Ethics Code</li> <li>- Regulations for regulatory and financial compensation for managers elected in the secretariats at all levels of the Organization and for managers of bodies, associations, companies and the like promoted / participated by CISL and / or CISL Federations</li> <li>- Regulations for economic and regulatory treatments for operators/employees/managers in secondment through trade unions, companies, associations promoted by CISL and/or CISL affiliated federations.</li> </ul> |

|  |   |
|--|---|
|  | Fulfilment of the obligation on transparency and economic-associative reporting |
|--|---|

The communication concerns categories of data whose transmission and/or disclosure where necessary for the performance of the activities and the pursuit of the purposes of the **Holder** in managing established relationship. The consent for processing of personal data is not required in case of legal obligations or to fulfill the obligations arising from the existing relationship or if another hypothesis of exclusion should occur (in particular when implementing rules provided by the Ethic Code and/or the legitimate interest of the **Holder** expressly provided also for the correct application of the current legislation and of regulations concerned, or even through third parties identified as data processing controllers).

**3) for computer security activity**

| Purposes  | Legal Basis   |
|---|---|
| - control and monitoring equipment use and IT infrastructures belonging to the CISL structures as well as bodies, companies, associations promoted and/or linked and/or collateral to CISL and/or CISL Federations by virtue of the associative and participatory relationship<br>- implementation of detection and notification procedures for breaches of personal data (data breach) | Carrying out of activities arising from established relationships.<br><br>Compliance with legal obligations (detection and notification of data breach events)<br><br>Legitimate interest |

**4) for communication to third parties for the purpose of sending promotional communications regarding their activities/services**

| Purposes   | Legal Basis  |
|--|--------------|
| Communications to third parties as follows:<br><br>- CISL structures as well as bodies, companies, associations promoted and/or linked and/or collateral to CISL by virtue of the associative and participatory relationship | Your consent |

The communication concerns categories of data listed above and specifically:

- o name, surname
- o address and email address
- o telephone & mobile contact details

**5) for sending promotional communications from the Holder**

| Purposes                         | Legal Basis  |
|----------------------------------|--------------|
| - SMS, e-mail, mail, phone calls | Your consent |

Sending communication concerns categories of data listed above and specifically:

- o name, surname
- o address and email address
- o telephone & mobile contact details

## 6) For statistical purposes

| Purposes   | Legal Basis                              |
|--|--|
| - statistical analysis by the Data processing data processing holder | legitimate interest of the <b>Holder</b> |

### How, where and for how long are kept your data?

#### How

The processing data is performed through paper and/or telematic procedures by specifically authorized subjects. To these persons are allowed access to your personal data to the extent and within the limits in which it is necessary for carrying out processing activities regarding you.

The **Holder** periodically checks the tools through which your data are processed and the security measures established for them which are constantly updated;

makes sure, also through subjects authorized to the processing, that no personal data are collected, processed, stored or kept, for which the treatment is not necessary or whose ends are exhausted;

verifies that the data are kept with the guarantee of integrity and authenticity and their use only for the purposes of the processing actually performed.

The **Holder** guarantees that the data which, even after the verifications, are exceeded or not relevant, will not be used except for the eventual conservation, according to the law, of the document or record containing them.

#### Where

The data are kept in paper, computer and electronic archives, located within the European economic area, and security measures are ensured.

#### How long

Your personal data are kept for the necessary time to complete the activity related to the management of the relationship with the **Holder** and for the obligations, also by the following rules

In particular:

|  |  |
|--|--|
| <ul style="list-style-type: none"> <li>- identification data</li> <li>- fiscal, administrative/accounting data</li> <li>- data relating to the state of health</li> <li>- data relating to the membership and/or position held</li> <li>- share of the union deduction withholding/paid in a single quota</li> <li>- data relating to the classification and the workplace/company where you work</li> <li>- data relating to pension treatment</li> <li>- social media account</li> </ul> | <p>Duration of the membership/statutory relationship<br/>Except for the following:</p> <ul style="list-style-type: none"> <li>- Termination of the relationship (for any reason) as set out in the Articles of Statute and the Regulations of CISL and of the <b>Holder</b>, as well as in:               <ul style="list-style-type: none"> <li>- Regulations for regulatory and financial compensation for managers elected in the secretariats at all levels of the Organization and for managers of bodies, associations, companies and the like promoted / participated by CISL and / or CISL Federations</li> <li>- Regulations for economic and regulatory treatments for operators/employees/managers in secondment through trade unions, companies, associations promoted by CISL and/or CISL affiliated federations.</li> </ul> </li> <li>- the aims which continue beyond the conclusion of the relationship (ex. Bookkeeping accountability, Article 2220 Civil Code)</li> <li>- the prescription terms: from five to ten years from the definition of the relationship and, in any case, from the moment in which the rights concerned can be exercised (Articles 2935, 2946 and 2947, and Articles 18 and 22, Civil Code)</li> <li>- the different terms that may be provided by the Statute of CISL and of the <b>Holder</b></li> </ul> |
|--|--|

|   |  |
|---|--|
|   | Except yet any litigation if this involves an extension of the aforementioned terms, for the time necessary to pursue the relative purpose   |
| Computer data (access logs to systems and networks and/or IP addresses)   | Keeping storage time depends on the presumed and/or detected risk and on the prejudicial consequences arising from it, without prejudice to the measures to make the data anonymous or suitable to limit the treatment<br>In any case, the data must be kept (starting from the knowledge/detection of the dangerous event or data breach) for the time necessary to proceed to the notification to the guarantor authority of the violation of the data through the procedures implemented by CISL and by the <b>Holder</b> , and in any case, to remedy it |
| Personal identification data (name, last name, address and email address, telephone and mobile number) necessary to send promotional communication of services/activities | Without prejudice to the revocation of consent in the case provided, the duration of the retention shall correspond to a maximum of 24 months from given consent itself.   |

Exhausted all the purposes which legitimize the retention of your personal data, the **Holder** will take care to delete them or make them anonymous.

#### Which are your rights?

The right you are entitled for are those which allow you to always have control of your data. They are the following:

- access;
- rectification;
- withdrawal of consent
- cancellation;
- limitation of treatment;
- opposition to the treatment;
- portability.

Basically, at any time and free of charge and without any special charges and formalities for your request, you can:

- get confirmation of the processing performed by the **Holder**;
- access to your personal data and to know its origin (when data are not obtained by you directly), the objectives and purposes of the processing, the data of the subjects to whom they are communicated, the retention period of your data or the criteria useful for determining it;
- update or rectify your personal data so that they are always correct and updated;
- revoke the consent at any time, if this constitutes the basis of the treatment. The withdrawal of consent, however, does not prejudice the lawfulness of the treatment based on the consent made before the revocation;
- delete your personal data from the databases and/or from the archives also in case of backup if they are no longer necessary for the purposes of the processing or if this is assumed to be illicit, and the conditions established by law are still present; and in any case if the treatment is not justified by another equally legitimate reason;
- limit the processing of your personal data in certain circumstances; for example, where you have contested its accuracy, for the period necessary for CISL to verify its correctness. You must be informed, in reasonable time, even when the suspension period has been completed or the cause of the limitation of treatment has ceased, and therefore the limitation itself revoked;

The **Holder** must proceed accordingly without delay and, in any case, no later than one month after receiving your request. The deadline may be extended by two months if necessary, taking into account the complexity and the number of requests received. In such cases, the **Holder** within one month of receiving your request will inform you by giving advice on the reasons for the extension.

For any further information, and however to send your request, please write to the data protection holder to the following email address: [federazione\\_fit@cisl.it](mailto:federazione_fit@cisl.it)

### **How and when can you oppose the processing of your personal data?**

For reasons related to your particular situation, you may object at any time to the processing of your personal data if based on legitimate interest, by sending your request to the **Holder**: [federazione\\_fit@cisl.it](mailto:federazione_fit@cisl.it)

You have the right to the cancellation of your personal data if there is no legitimate reason prevailing over which gave rise to your request.

### **To whom can you file a complaint?**

Without prejudice to any other action at administrative or judicial level, you can file a complaint to the data protection authority, unless you reside or work in another Member State. In the latter case, or in the case which the violation of the legislation on the personal data protection takes place in another EU country, the power to receive and to know the complaint will be the supervisory authority established in such EU country.

Each update of this privacy policy will be promptly communicated to you and by appropriate means and you will be notified if the **Holder** will continue the processing of your data for purposes other than those referred to in this policy, before going ahead and in time necessary for your consent, if necessary.