## **Privacy policy**

#### Update April 2025

This Privacy Policy (hereinafter referred to as "PP") describes how Slow Food handles personal data. In fact, by virtue of a Joint agreement for the processing of personal data, the following institutions are joint data controllers:

- FONDAZIONE SLOW FOOD ETS, with offices in ITALY in BRA, in the province of CUNEO, Piazza XX Settembre 5
   postcode 12042, tax code no. 91019770048, VAT number 02743970044
- SLOW FOOD ITALIA A.P.S., with registered offices in ITALY at Via Mendicità Istruita 14, 12042 Bra (Cn), tax code no. 91008360041, VAT number 02106030048
- SLOW FOOD PROMOTION SRL S.B., with registered offices in ITALY at Via della Mendicità Istruita, 14, 12042
   Bra (Cn), tax code no. 0220020040
- SLOW FOOD EDITORE SRL with registered offices in ITALY at Via Audisio, 5, 12042 Bra (Cn), tax code no. 02177750045

The information is provided in this PP pursuant to art. 13 and 14 of the GDPR for the various types of data subjects:

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- 10.4 Commercial, promotional and sales-oriented content and communications
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- 12. Product reporters of the Arca del Gusto (Ark of Taste), Slow Food Presidia
- 13. Hosts of Slow Food Experience to publish on Airbnb
- 14. Host families
- 15. Volunteers for events
- 16. Exhibitors, speakers, cooks, guests at fair events
- 17. Delegates
- 18. Anyone in relation to their own photographic and video images
- 19. Producers, businesses and representatives of Thematic Networks and Slow Food projects
- 20. Chefs and restaurateurs who are members of the Slow Food Cooks' Alliance project
- 21. Participants in training courses and educational activities, workshops, conferences and webinars
- 22. Collaborators, people, premises and shops reported and mentioned in the Slow Food Editore Guides
- 23. Workers and candidates
- 24. Signatories of conventions, contracts, etc.
- 25. Work contacts between partners, customers, suppliers, consultants, collaborators, journalists and public administrations, etc.
- 26. Institutional and political positions within Slow Food
- 27. Any person involved in accounting, tax, fiscal and social security obligations incumbent on one of the Controllers
  - 27.1 Transparency
- 28. Whistleblowing (in compliance with Decree no. 24/2023)

#### 1. Preamble

When necessary, beyond the cases where legal obligations or contractual obligations or the legitimate interest both of the Joint Controllers (collegially or individually) and of third parties are applied, the data subject must, in any case after reading the information note, give his/her consent to the processing and communication of his/her data for the purposes and within the limits described below, failing which the Joint Controllers will be unable to process the data in order to carry out and implement the services requested by or offered to the data subject.

#### 1.1. Methods of data handling

The processing of personal data, understood as the collection, recording, organization, storage, processing, modification, deletion or destruction or the combination of two or more of these operations, takes place through manual, IT and telematic tools, including by automated means, with logics strictly related to the stated purposes and, in any case, in order to guarantee security and confidentiality and for the time strictly necessary to achieve the purposes for which they were collected.

Data are processed lawfully and fairly, are collected and recorded for specific, explicit and legitimate purposes, correctly, and if necessary updated, pertinent, complete and not exceeding the purposes of the processing, in compliance with the minimum standards of security and of fundamental rights and freedoms, as well as of the dignity of the data subject with particular reference to privacy and personal identity.

#### Data may be transmitted to:

- data controllers and processors, both internal to the Data Controller's organisation, and external, to all
  organisational levels of the Slow Food association (local, regional, supra-regional, national, international)
  and which carry out specific tasks and operations;
- project partners;

third parties, in the cases provided for by law or by contracts and agreements.

Specific security measures are observed to prevent the loss of data, their illicit or incorrect use and unauthorized access.

The data will be stored until the end of the legal limitation period for defence, or to enforce a right in court, after the purpose (purposes of the processing) for which the data was collected has been exhausted.

Personal data will generally not be transferred to a recipient in a third country or to an international organisation outside the European Union (EU) or the European Economic Area (EEA), except in special cases described below.

#### 1.2. Rights of data subjects

The data subject may at any time: exercise his / her rights (access, rectification, cancellation, limitation, portability, opposition, absence of automated decision processes) towards the data controller, where so envisaged, in accordance with articles from 15 to 22 of the GDPR (<a href="https://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=IT#d1e2168-1-1">https://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=IT#d1e2168-1-1</a>); lodge a complaint with the Personal Data Authority (<a href="https://eur-lex.europa.eu/legal-content/">https://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=IT#d1e2168-1-1</a>); lodge a complaint with the Personal Data Authority (<a href="https://eur-lex.europa.eu/legal-content/">https://eur-lex.europa.eu/legal-content/</a>); and, should the processing be based on consent, revoke this consent, taking into account that the revocation does not affect the lawfulness of the processing based on consent before the revocation.

#### 1.3. Applicable law

The processing of personal data relating to the website is governed by European Reg. (EU) 2016/679, and by Italian legislation, L. Decree no 196 dated 30 June 2003 and subsequent amendments and additions, as well as by the provisions of the Authority for the protection of personal data.

#### 1.4. Forwarding addresses

Requests should be addressed to the Data Controller via the addresses <a href="mailto:privacy@slowfood.com">privacy@slowfood.com</a> and <a href="mailto:privacy@slowfood.it">privacy@slowfood.it</a>

The Data Protection Officer is SPAZIOTTANTOTTO S.r.l., VAT number 08283280017 with registered office in Turin, in Via Nino Bixio, 8, in the person of Mr Massimiliano Bonsignori, Engineer, dpo@spazio88.com, phone 0114337431.

## 2. Users connecting to websites

For the following internet domains and related subdomains, including websites, portals, landing pages, forms, apps, etc.

- slowfood.com
- slowfood.it
- terramadresalonedelgusto.com/
- slowfish.slowfood.it
- cheese.slowfood.it
- slowinefair.slowfood.it
- fondazioneslowfood.it
- slowfoodfoundation.org
- slowfood.it/slow-cheese
- donate.slowfood.com
- imagelibrary.slowfood.it
- www.slowfoodeditore.it
- www.slowfood.fr
- foodpolicycoalition.eu
- coffeecoalition.slowfood.com
- coffeecoalition.slowfood.it
- slowinecoalition.slowfood.it
- crm.slowfood.it
- shop.slowfood.it
- sfea.slowfood.it

Users who navigate and consult these should know that, in relation to the processing of their personal data as users, the processing connected to the web services of these websites takes place first of all at the internet service providers' facilities used on each occasion to implement and make the website available and also at the headquarters of the joint Data Controllers. The data processed by the appointed personnel and by the designated data processors, including for any maintenance and administration operation of the processing systems, may concern:

#### 2.1. Navigation and technically indispensable data

During their normal operation, the computer systems and software procedures used to operate this website acquire some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects, but 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 the IP addresses or domain names of the computers employed by users who connect to the website, the URI (Uniform Resource Identifier) addresses 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 numeric code indicating the status of the response given by the server (success, error, etc.) and other parameters relating to the operating system and to the user's IT environment. These data are used only to obtain anonymous statistical information on the use of the website and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the website.

#### 2.2. Data provided voluntarily by the user (via forms and emails)

Data relating to identified or identifiable persons may also be processed, based on additional information communicated by the data subject: for example, by filling in data collection forms (forms); or with the optional,

explicit and voluntary sending of electronic mail to the addresses indicated on this website, which implies the subsequent acquisition of the sender's address, necessary to respond to requests, as well as of any other personal data included in the communication.

The personal data voluntarily provided through registration forms or online registrations for participation in events, such as workshops, forums, conferences, even in online mode (e.g. webinars) are used for the organisational purposes of the event, including the sending of useful communications for participation in the event itself as well as the sending of any material of informative, didactic and functional content to support the event itself. Follow-up communications may be provided and, based on the legitimate interest of the Data Controller, the data subject may receive invitations or reports of similar events.

When the event is organised in collaboration and partnership with other Bodies, the personal data of the data subject may be shared for the purposes described above.

For events that require the online payment of the service, without prejudice to the provisions of this paragraph, please also refer to the following paragraph "E-Commerce Data and for online payments".

#### 2.3. E-commerce data and for online payments

The data processed for managing store orders (on the websites where there is one) and for managing online payments include records, addresses, purchase lists, reports and notes. Credit card data are not directly acquired and processed as they are managed directly by the payment system (e.g. Gestpay Banca Sella, Paypal, etc.). Unless opposed, the purchaser is registered in both the association and the commercial newsletters (see the dedicated paragraphs), from which he/she can subsequently unsubscribe.

#### 2.4. Registration data for Image Library (Slow Food photo archive)

The portal <u>imagelibrary.slowfood.it</u> is the Slow Food photographic archive. Anyone can consult the images inserted and made available. Subject to the applicant's registration and the check and evaluation of the requests, the images can be downloaded in high resolution, without watermark and with a licence for use. The personal data of registered users (name, surname, e-mail, username, password, company) are used to access the system, to manage orders and to archive historical information concerning the access and downloads of photographic documents and videos, in order also to verify the correctness of their use.

By prior consent, the registered user is registered in the association newsletter (see the specific paragraph "Recipients of the association newsletter"), from which he/she can subsequently unsubscribe.

#### 2.5. Profiling data

The profiling data relating to the habits or consumption choices of the person concerned are not acquired directly. However, it is possible that such information should be acquired by independent or other subjects through links or by incorporating third-party elements. See the following Chapter on Cookies.

#### 2.6. Cookies

Like others, these websites save cookies on the user's computer browser in order to transmit personal information and to enhance his/her experience. In fact, cookies are small text strings which the websites visited by the user send to his/her terminal (usually to the browser), where they are stored, sometimes for a long time, to be then retransmitted to the same websites at the next visit.

As explained below, it is possible to choose whether and which cookies to accept, bearing in mind that refusing their use may affect the ability to perform certain transactions on the website or the accuracy and adequacy of some proposed customised content or the ability to recognise the user from one visit to the next. If no choice is made in this regard, the default settings will be applied and all cookies will be activated: however, this decision can be notified or changed at any time.

In particular, so-called session cookies are used, which are not stored permanently on the user's computer and disappear when the browser is closed and whose use is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) required to allow the safe and efficient browsing of the

website and which avoid the use of other IT techniques which may potentially damage users' browsing privacy and do not allow acquiring the user's personal identification data.

Analytics cookies are used, in order to help understand how visitors interact with the website's contents, by collecting information (geographical and web origin, technology used, language, entry pages, pages visited, length of visits etc.) and generating website usage statistics without the personal identification of individual visitors. All these should be considered technical cookies for which, since consent is not required, the opt-out mechanism applies. Technical cookies are not transmitted to third parties as they are necessary or useful for the website to function; therefore they are processed only by persons qualified as processors or system administrators.

Each website may specifically use different cookies: for details see the dedicated "Cookie policy" page of each website which is accessible therein.

Some people prefer not to enable cookies and for this reason almost all browsers offer the option of managing them in order to respect users' preferences. Some browsers allow setting rules to manage cookies for each individual website, an option which offers a more precise control over privacy. This means that cookies on all websites can be disabled, except on those which are trusted.

Another function available on some browsers is the private browsing or incognito mode, so that all cookies created in this mode are deleted after closing.

See the instructions contained in the links to learn more about cookie management in the relevant browsers:

Chrome: <a href="https://support.google.com/chrome/answer/95647?hl=it">https://support.google.com/chrome/answer/95647?hl=it</a> Firefox: <a href="https://support.mozilla.org/it/kb/Gestione%20dei%20cookie">https://support.mozilla.org/it/kb/Gestione%20dei%20cookie</a>

Internet Explorer 11: http://windows.microsoft.com/it-it/windows-vista/block-or-allow-cookie

Internet Explorer 9: http://windows.microsoft.com/it-it/windows7/how-to-manage-cookie-in-internet-explorer-9

Safari: http://support.apple.com/kb/HT1677?viewlocale=it IT

#### 2.7. Purposes of data processing, transmission and dissemination

The personal data collected are only used to carry out the services requested and are transmitted to third parties only if this is necessary for that purpose. Services include: consultation and mere use of the sites and their content; registration and access to reserved areas; donations and payments; subscription and receipt of the newsletter; reports; contact request; etc.

In any case, no data deriving from web services is disseminated or published without the prior consent of the data subject except in cases where the legitimate interest of the controller is applicable

Finally, please note that in some cases (not falling within ordinary management) the Public Authorities may request additional information, including of a personal nature, which the Data Controller must answer.

#### 2.8. Optional supply of data

Apart from what has been specified for navigation and technically indispensable data, the user is free to provide personal data for specific requests concerning products and/or services. Failure to provide certain data, deemed essential, may make it impossible to obtain what is requested.

#### 2.9. Insights for specific services

Some web services or forms which collect personal data, indicated below, may concern specific types of interested parties, for whom specific in-depth information is provided in the following Chapters:

Web service / form	Typologies data subjects
members.slowfood.com	Registered members worldwide
soci.slowfood.it	Registered Italian members

slowfood.com/donate	Donors
www.slowfood.it/newsletter	Recipients of the Slow Food
www.siowioda.ity newsietter	Italia newsletter.
www.slowfood.com/newsletter www.fondazioneslowfood.com	Recipients of Fondazione Slow Food newsletters for members and the general public according to language and/or project interest
www.slowfoodeditore.it/it/newsletter	Recipients of newsletters and commercial, promotional and sales-oriented communications
www.fondazioneslowfood.com/en/what-we-do/the-ark-of-	
taste/nominations-from-around-the-world/nominate-a-product/	Product reporters of the Arca
www.fondazioneslowfood.com/it/cosa-facciamo/arca-del- gusto/segnalazioni-prodotti-dellarca/segnala-un-prodotto/	del Gusto (Ark of Taste) and Slow Food Presidia
confluence.slowfood.it/pages/viewpage.action?pageId=1077903453	Applications for Community Gardens
docs.google.com/forms/d/1rjoTuGZUgp1ScVQrd8a6- poHnaujGEk5BFg_9WktRq4/edit	Applications for School Gardens
confluence.slowfood.it/pages/viewpage.action?pageId=1310589236	Participants in the training courses of the Gardens
communities.slowfood.it/comm/login/	Community members
go.slowfood.it/alleanza-cuochi	Cuochi dell'Alleanza dei cuochi Slow Food
experiences.slowfood.com/en/sendexp	Clar Familia and discount and an
experiences.slowfood.com/it/sendexp	Slow Food experience reporters
experiences.slowfood.com/es/sendexp	- Airbnb
imagelibrary.slowfood.it/register	Users registered with the Image Library
coffeecoalition.slowfood.com coffeecoalition.slowfood.it	Users who choose to join the coalition for good, clean and fair coffee
shop.slowfood.it	Members and buyers of the online shop
sfeapps.slowfood.it/applications/terramadre sfeapps.slowfood.it/applications/slowfish sfeapps.slowfood.it/applications/cheese sfeapps.slowfood.it/applications/slow-wine-fair sfeapps.slowfood.it/applications/slow-wine-world-tour sfeapps.slowfood.it/applications/slow-wine-tour-asia go.slowfood.it/terramadre-buyer	Accredited exhibitors at the events and buyers
go.slowfood.it/slowinefair-premio-carta-vini go.slowfood.it/slowinefair-best-wine-list-award	Slow Wine Fair Producers
go.slowfood.it/terramadre-volontari go.slowfood.it/terramadre-eventi	Fair event volunteers
go.slowfood.it/delegates-it go.slowfood.it/delegates-en go.slowfood.it/delegates-fr go.slowfood.it/delegates-es go.slowfood.it/delegates-jp go.slowfood.it/delegates-pt go.slowfood.it/delegates-de go.slowfood.it/delegates-ru	Terra Madre delegates participating in events

go.slowfood.it/press-terramadre-it
go.slowfood.it/press-terramadre-en
go.slowfood.it/press-cheese-it
go.slowfood.it/press-cheese-en
go.slowfood.it/press-fish-it
go.slowfood.it/press-fish-en
go.slowfood.it/press-slowinefair-it
go.slowfood.it/press-slowinefair-en

#### 2.10. Slow Food CRMs

- Fondazione Slow Food Ets CRM for the management of the movement on an international scale;
- Slow Food Italia Aps CRM for the management of members, volunteers and Communities on a national scale;
- Slow Food Promozione Srl Events CRM for the management of exhibitors at fairs and event-related contract regulations
- Slow Food Editore Srl CRM of the management of the publishing house's publications and contacts

are to be regarded as confidential, accessible only after authentication, for the exclusive use of authorised and appointed parties. Unauthorised access to these areas or continuing to stay in these will be prosecuted according to the law (Penal Code art. 615-ter) and constitute an irregularity prerequisite for the administrative responsibility (L. Decree 231/2001 art. 24-bis) of the entity with which the offender operates.

Authorised users should be aware that for these areas technical cookies (session, security, navigation, etc.) are used in the user's browser, without the possibility of exclusion, in order that this may operate correctly. The processing, mainly automated, of the authorised subjects' data (authentication credentials, access logs and related attempts, operation logs, etc.) falls within the Data Controller's management of the information system, including with a view to cybersecurity, and is regulated and illustrated in detail in the internal Slow Food IT Regulation. Data are temporarily stored, are not disseminated and are possibly accessible, if necessary, by the technical staff (developers and systems engineers), unless required for further legitimate purposes provided for by the Code on the protection of personal data. The information (texts, videos and images) that the user uploads to the private area are protected by encryption and authentication systems and are accessible only to authorised users, i.e. to the interested parties and/or to the intermediaries involved. This information is not subject to dissemination operations.

## 3 Smartphone App users

Every App has a specific dedicated privacy policy of its own, directly accessible through the App itself, which specifies typologies of data processed, methods and aims of data handling for which explicit consent may be required. This Chapter provides details of the overall policy regulating the Controller's management of the App.

Personal data processed through the application may be surfing data and data processed in proportion to the services rendered thereby or rendered voluntarily in the forms contained therein.

Such data may be processed on a case-by-case basis in order to:

- enable surfing of the Application and the provision of all the other services made available by the Controller, including management of Application security and the delivery of push emails (wherever expressly activated by the subject concerned);
- enable recording of user content (for example: word-for-word remarks, images and preferences) with which
  the user may make full use of the application itself. These data may be used to enable their retrieval by
  multiple devices owned by the user and/or to make them available for subsequent versions of the application.;
- manage authentication utilities and layers, to contact the data subject, for example, or deliver communications (newsletters, email, messages) conditional on the subject's explicit consent;

handle specific functionalities from SDKs (Software Development Kits), provided by third parties, conditional
on the consent of the data subject or the legitimate interest of the controller according to the functional or
optional character of the service provided.

The services provided to the Controller by Third Parties entail the access of said Third Parties to the personal data and other information contained in the user's device, including for purposes other than the provision of services. With reference to this possible further processing, the Third Parties act as autonomous controllers, which is the reason why links to the private policies of the Third Parties involved are provided in the specific privacy policy of the App.

Personal data are transferred inside the European Union or the European Economic Area, while in the event of transfers outside the European Union, the adequacy decisions adopted by the European Commission with regard to recipient countries that ensure a corresponding level of data protection and/or designations of Controllers of data handling consistent with the Standard Contractual Clauses Standard (SCC) approved by the European Commission, shall be applicable.

### **4 Fondazione Slow Food Ets Participants**

Slow Food has assumed, as of November 28, 2022, the new legal status of a participatory foundation open to individuals, public or private legal entities, organizations, Local Groups and Territorial Branches that share Slow Food's aims and carry out their projects in their respective local areas in order to contribute to its life and the realization of its goals.

"Participants" are defined as natural persons who join Slow Food directly as members, activists and leaders. Direct members of Territorial Offices and Local Groups are regarded by right as participants in the Slow Food Foundation in accordance with existing agreements among the parties, albeit entitled not to join.

Participation has a precise duration and according to procedure (directly to the Foundation, or through a local group: communities, convivia, thematic groups, farms) may be an be extended as many times as desired by renewing membership of the movement.

The data of participants are collected directly from the data subjects who freely provide them; they may be collected and provided by another participating legal entity (local group) to which participants are linked in accordance with the general regulations or bilateral agreements (see Chapter 4.1 "Members and cardholders of national associations or organizations operating locally as Territorial Offices or Local Groups). It is the responsibility of the other participating legal entity to ensure the lawfulness of the data transfer and to inform the data subjects about the transfer of their data to Slow Food.

Depending on participation procedure, participants' data refer to:

- for all name, surname, date of birth, gender, address, telephone contact, e-mail, language
- for supporters information about their contributions;
- for activists and leaders information about their role in the organization;

some are essential; others are optional; they are used to maintain direct contacts between Slow Food and its participants through the sending of service and renewal communications and the participatory information and dissemination newsletter, without the need for further consent, based on the specific information notice (see paragraph 10), without prejudice to the right to object to the communications at any time.

If freely provided by the user, the telephone number may be used for the instantaneous communication of messages as set out in the paragraph "Recipients of Whatsapp communications or instantaneous messages by smartphone apps".

Participants' data are retained indefinitely as long as participation is renewed; sending of the participatory information and disclosure newsletter is discontinued in case of opposition, however, without removal of the participant's data.

## 4.1 Members and cardholders of national associations or organizations operating locally as Territorial Offices or Local Groups

The communication of personal data to all organizational levels of the association (local, regional, supra-regional, national, international) is regulated by specific agreements and tasks which regulate:

- the participation, as of right, of members of the national leadership in Slow Food;
- any additional activities, in addition to registration for the purpose of Slow Food membership, such as, for example: periodic communications, call to collective actions, participation in campaigns, raising awareness of issues and proposals, fundraising, etc.;
- breadth and detail of data, depending on the activities envisaged in the agreement;
- ways and timing of data transfer;
- obligations on the part of the national directorate, particularly to ensure the lawfulness of the data transfer and to inform data subjects about the transfer of their data to Slow Food.

So even members of a Territorial Office or Local Group can also become participants in their own right, according to agreements between Slow Food and the national department itself. It is up to the national department to ensure data transfer compliance and to inform its members about the transfer of their data to Slow Food. In any case, the member of the national department, may decide, by objecting, not to become a participant of Territorial Office or Local Group.

#### 4.2 Institutional positions of Fondazione Slow Food

The data of those who hold institutional posts in Slow Food national departments are processed according to Chapter 26 "Institutional and political positions within Slow Food".

#### 4.3 Former participants of Fondazione Slow Food Ets

Even in the case of discontinuation of participation in Slow Food, the legitimate interest of the Data Controller remains in reaching the data subject with the information and dissemination newsletter and similar communications, without prejudice to the data subject's right to object.

The data of former participants are used for communication purposes, in the absence of explicit consent and explicit objection, up to 36 months after discontinuation of participation; after that period or in case of objection they are kept up to 40 months after interruption of participation, but with limited processing; after that further period, the data are anonymized within two months or deleted.

### 5 Slow Food Italia Aps registered membership

The Slow Food member, a natural person, is affiliated at territorial level, in the reference Conduct; his/her data are shared in co-ownership both by the Regional Association of reference, and by the National Association Slow Food Italy Aps by virtue of the National Statute of Slow Food Italy, for the existing legal relationships; moreover, by virtue of the co-ownership agreement referred to in the introduction, Slow Food Italy Aps shares such data with the other related legal entities. Each organisational level only processes data pertaining to its own level (territorial, regional, national, international).

In the case of membership of legal persons, the data of the contact persons and/or legal representatives are collected and processed as those of the members of natural persons. In the event of an alternation in the role, the legal entity member is required to notify the Association that provides for the updating of the data, without further processing of the previous ones.

The membership data of legal entities are freely provided by the subject: some of these (Name, Surname, Dare of Birth, Gender, Address, E-mail, Tax Code Number) are indispensable, others are optional.

If freely provided by the user, the telephone number may be used for the instantaneous communication of messages as set out in the paragraph entitled "Recipients of WhatsApp communications or instantaneous messages by smartphone apps".

Il tesseramento prevede anche tipologie di tessera iscrivibili a minori. In questo caso, per le procedure di tesseramento cartacee i dati possono essere trattati esclusivamente previo consenso del genitore o di chi ne fa le veci. Con esclusivo riferimento alla procedura di tesseramento on line il consenso può essere espresso direttamente dal minore che abbia compiuto 16 anni.

Non è richiesto il consenso al trattamento per le finalità e le attività di carattere associativo che, con la prima registrazione, comprende anche la ricezione della newsletter associativa (si veda il paragrafo specifico), dalla quale ci si può successivamente disiscrivere.

I dati dei soci sono scritti nel libro soci; il libro soci è conservato ai fini di legge per 120 mesi dalla fine dell'anno sociale di iscrizione.

I dati dei tesserati sono conservati illimitatamente fintanto che la tessera viene rinnovata; l'invio della newsletter associativa è interrotto in caso di opposizione, tuttavia senza rimozione dei dati del socio.

If a member unsubscribes from the newsletter and fails to renew their membership card when it expires, their data will be stored in accordance with paragraph "former Slow Food Italia cardholders" below. If a member renews their membership card but has unsubscribed from the Newsletter, they will receive communications once more via this channel, from which they may unsubscribe if they wish.

A Slow Food Italia member has access to the Slow Food Web App in Tasca, a tool dedicated to members with which they can stay informed about Slow Food activities and opportunities reserved to members, as well as receive advice about food establishments and choices. Subject to prior agreement, the app handles the geolocation data of users who wish to receive advice according to their geographical position.

#### 5.1 Slow Food Italia Aps volunteers

Slow Food Italia Aps volunteers are listed in a special register which is obligatory by law (Art. 17 of the Third Sector Code). The volunteer register is managed through CRM. Volunteer data consist of name, date and place of birth, date of commencement of voluntary service, date of termination if applicable and information regarding the type of voluntary activity performed. Additional data (e.g.IBAN no., expense reports, receipts etc.) may be collected for the purpose of reimbursement of expenses. The volunteer receives a notice confirming that he/she has been entered in the register. The volunteer's personal data may be communicated to subjects appointed and responsible for processing by Slow Food Italia Aps, as well as to the insurance company for the obligatory policy.

#### 5.2 Institutional positions of Slow Food Italia Aps

The data of those who hold institutional positions in the Slow Food Italy Association, regional associations and convivia and any other articulations at the territorial or local level are processed in accordance with Chapter 26, "Institutional and political positions within Slow Food."

#### 5.3 Former members of Slow Food Italia Aps

In the case of termination of membership in the Slow Food Italia association, the legitimate interest of the Data Controller in reaching the data subject with the association newsletter and similar communications remains, without prejudice to the data subject's right to object.

The data of former members are used for communication purposes, in the absence of explicit consent and explicit opposition, until 36 months after the expiration of the non-renewed membership; after this period or in case of opposition they are kept until 40 months after the expiration of the non-renewed membership, but with limited processing; after this further period, the data are anonymized within two months.

## **6 Community members**

Personal data are collected using the online or paper version of the foundation document:

- directly, from data subjects;
- indirectly, from the Community Spokesperson, duly appointed as external Controller of data handling. In this case the data subjects subsequently receive a communication via email to confirm their adherence.

The expressed will to be part of the Community, made in the founding declaration and the subsequent membership, envisages the active involvement of the member in the community and the legitimate interest of the controller to send newsletters of an associative nature.

The identification data and e-mail collected are processed:

- to complete the membership in the Community
- to keep the member of the Community up to date through communications (possibly also via smartphone
  app, if the phone number was provided during the application process) and newsletters of an associative or
  informative nature, of the Slow Food Movement, including the organisational forms through which the
  movement operates on a national and international scale and to suggest that members of the Community
  should be involved in campaigns, petitions, and activities based on the right of initiative by European citizens

In addition to the recipients indicated in the introductory paragraphs, the data may be transmitted to the spokespersons of the Community to which the data subject adheres (the spokespersons act as autonomous controllers).

The data of people belonging to communities outside the European Union (EU) or the European Economic Area (EEA) will be shared with these "bodies", referents and spokespersons also outside Italy.

## 7 Participants in initiatives such as surveys, questionnaires, evaluations and campaigns and call to action signatories

Through physical presidia (with pollsters or volunteers) or through digital platforms and tools (Google forms, Confluence Survey, Survey Monkey, Change.org, Quick tap survey, etc. managed by third parties, autonomous data controllers) Slow Food collects information (answers to questions which are then treated in aggregate and anonymous form) on topics of interest to its mission or asks for signatures for petitions for awareness campaigns on laws, measures, etc. In these cases, people (adults) are required to give their consent to participate in the initiative and in order to be further informed about its development (see the specific paragraph "10.3 Thematic or project content, campaigns or fund-raising"). By prior consent, the reporter is registered in the association newsletter (see the specific paragraph "Newsletter recipients", from which he/she can subsequently unsubscribe. Initiatives may be promoted in collaboration with private and public bodies in the context of funded research, cooperation or partnership projects, including those on an international scale. Some data might thus be shared, with said bodies as assignees, exclusively for the aims of the initiative, or for reasons of evidence in the case of funded projects.

#### 7.1 Special cases

Among the platforms and web services of third parties that collect personal data as indicated above, we wish to highlight the following, addressed to specific data subjects, for whom specific in-depth information is prepared in the following sections:

Web / form service	Type of interested parties
https://confluence.slowfood.it/display/SWRP/Orti+di+Comunita https://confluence.slowfood.it/display/SWRP/F1+Community+Garden https://confluence.slowfood.it/display/SWRP/F2+Community+Garden	Members of Communities for evaluation of the impact of the Community Garden.
https://sfeapps.slowfood.it/applications/impact-gfgf- elections-2024/ https://sfeapps.slowfood.it/applications/impact/	Those compiling the Impact Form to measure the impact of Slow Food projects round the world
ENG: https://www.tfaforms.com/5151501 FRA: https://www.tfaforms.com/5152289 PORT: https://www.tfaforms.com/5152477 TED: https://www.tfaforms.com/5152339 ITA: https://www.tfaforms.com/5152484 SPA: https://www.tfaforms.com/5152468 RUS: https://www.tfaforms.com/5152509	Those compiling the Impact Form to measure the impact of Slow Food projects round the world

#### 8 Donors

The data required for donations are freely provided by the data subject: some of these (Name, Surname, E-mail) are indispensable; others are optional (Country, Notes, Slow Food Membership, Project of Interest, etc.). Consent to processing is not required for the purpose related to donation (accounting records, etc.). Consent IS required to send the newsletter of the association. Consent is required to publish data in the official list of donors. The payment system envisages communicating some data to the bank providing the service.

## 9 Anyone who makes a payment

In some cases (for example, to make a donation or to renew membership in Slow Food or to give a gift or renew a Slow Food Italy membership card) it may be necessary to make a payment, including online on Slow Food websites. In these cases, it is expected that certain data will be communicated to the electronic money service provider or the bank providing the service that enables the payment.

## 10 Newsletter recipients

The newsletter that arrives by e-mail is managed by Mailup and Marketing Cloud and is divided into various channels with different topics and contents, some with information and news on participation (in the Fondazione Slow Food), some associational (with regard to Associazione Slow Food Italia), and others of a commercial/promotional nature. The insertion of the recipient's contact takes place either for the legitimate interest of Slow Food or based on the consent of the data subject.

In the event that the communications are not of interest to the recipient, it is possible to avoid further communications related to the specific channel or to others, by clicking on the appropriate unsubscribe link contained in each message, or by writing to the contact details (see paragraph Errore. L'origine riferimento non è stata trovata.), exercising the

right to unsubscribe from the newsletter. The recipient can, therefore, decide to unsubscribe *in full* or only from some channels.

Registration to the various types of channel takes place according to the following policies.

#### 10.1 Content related to the association

The Slow Food association newsletter (distinguished on the basis of the language and the country of registration) is a periodic communication of an exclusively associative nature, which disseminates the activities of the movement and with a cultural and educational nature for all members of the association and other categories of persons interested in various capacities on the basis of the legitimate interest of the Data Controller (by way of example: host families, producers of presidium products, reporters of Ark of Taste products, etc.). The links which may be contained in the communication could refer to websites of supporters and partners of the association and of its projects, should this be useful to analyse in depth the themes within the context of specific associative projects.

The e-mail contacts used to send the periodic newsletter are obtained:

- directly from the membership and from all other situations in which the legitimate interest applies (e.g. host families, community members, volunteers, etc.); the legitimate interest in sending the membership newsletter is maintained even when the data subject interrupts the membership relationship from which this legitimate interest initially arose, without prejudice to the possibility of opposing the continuation of the sending of communications;
- as well as from voluntary registrations by the recipient, from whom explicit consent is always requested (e.g.
  written in the case of paper forms, digital in the case of apps, games and online forms, oral in the case of
  acquiring business cards);
- possibly from "consensual" lists supplied by third parties, where conditions are met

#### Summary table:

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CATEGORIES OF DATA SUBJECTS	LEGAL BASIS FOR SENDING THE ASSOCIATIVE NEWS LETTER
Voluntarily Registered	CONSENT
Participants in surveys, evaluations or	CONSENT
campaign signatories	
Registered Members worldwide	LEGITIMATE INTEREST
Person who gives away a membership card	CONSENT
Community members	LEGITIMATE INTEREST
Donors	CONSENT
Product reporters of the Arca del Gusto (Ark of Taste), Slow Food Presidia	LEGITIMATE INTEREST
Hosts of Slow Food Experience to publish on Airbnb	CONSENT
Host families	LEGITIMATE INTEREST
Volunteers for events	LEGITIMATE INTEREST
Exhibitors, speakers, cooks, guests at fair events	CONSENT
Delegates	LEGITIMATE INTEREST
Manufacturers, businesses and representatives of Slow Food projects	LEGITIMATE INTEREST
Chefs and restaurateurs who are	LEGITIMATE INTEREST (becoming a member of the project entails
members of the Slow Food Chefs	membership in the association as a member, and therefore receiving
Alliance project	the association newsletter
Participants in training courses	CONSENT
Signatories of conventions, contracts, etc.	CONSENT
Institutional and political positions within the Association	LEGITIMATE INTEREST

#### 10.2 Renewal Notices

The newsletter can also be used to send communications about the expiry of the membership or to propose the renewal of membership or a donation. We deem legitimate the interest in sending such communications to those who, already members or already donors, are subscribed to at least one newsletter channel of the association or, although they are no longer subscribed to any channel, have not opposed, after receiving a confirmation message, the receipt of a single proposal within 90 days from the expiry of the membership of the Association or the anniversary of the donation.

#### 10.3 Thematic or project content, campaigns or fund-raising

The e-mail contacts used for sending thematic and project, campaign or fundraising newsletters derive directly from adhering to the project and from voluntary registrations by the recipient to whom a confirmation request is always submitted.

The project newsletters are periodic communications to disseminate the activities, evolutions, updates of the project itself and of specific themes. By maintaining an exclusively associative (therefore NOT commercial) connotation, they contribute to the dissemination of the culture of the movement and they analyse in depth particular and specific themes. The links which may be contained in the communication could refer to websites of supporters and partners of the association and of its projects, should this be useful to analyse in depth the themes within the context of specific associative projects.

#### 10.4 Commercial, promotional and sales-oriented content and communications

The e-mail contacts used for sending periodic newsletters, other than those of associations and/or projects, containing commercial, promotional and sales-oriented communications (by Slow Food Promotion, Slow Food Publisher and Wine Bank) come from voluntary registrations by the recipient to whom a request for confirmation is always submitted, as well as from information acquired in a context of sale of products or services of the Controller or in any case similar, for legitimate interest. The newsletter includes sending information, commercial communications, promotional and advertising material. It is hereby underlined that contacts are not acquired from public directories of subscribers.

## 11 Recipients of WhatsApp communications or instant messaging via smartphone app

The tool of instant messaging via smartphone app (by way of example WhatsApp, Telegram, etc.) can be used, for sending renewal communications (see paragraph 10.2), welcome messages, limited warning messages relating to events or initiatives of interest to the member or Community member, where the telephone number has been communicated during membership or the application to join the Community. The legal basis for such processing is the legitimate interest of the Data Controller, except for the right to object by writing to the contact details (see paragraph Errore. L'origine riferimento non è stata trovata.).

## 12 Product reporters of the Arca del Gusto (Ark of Taste), Slow Food Presidia

The data requested are freely provided by the data subject: some of these (Name, Telephone, E-mail) are indispensable; others are optional. The publication of the descriptive sheet of the reported product is bound to the consent to the processing of the data which also includes the reception of the association newsletter on the basis of the legitimate interest of the data controller (see specific paragraph) from which it is possible to unsubscribe at any time.

Specific consent is required in order to publish the identification data (name and surname) of the reporting person.

## 13 Hosts of Slow Food Experience to publish on Airbnb

The data acquired from the experience form application are used to record and evaluate the application for the selection of the experiences recommended by Slow Food. Submitting the candidacy by filling in the form does not guarantee the publication of the experience on the Airbnb platform which will take place only when the selection by Slow Food and Airbnb is passed. Therefore, the data will be brought to the attention of Airbnb who will process these as an independent controller, according to their own policies. Submitting the form provides consent both to the registration of data and to their communication to Airbnb, in the USA, which belongs to the privacy shield mechanism, in order to jointly assess the experience proposed by the Host.

In order to monitor the progress of the experiences and their compliance with the selection criteria, Airbnb shares with Slow Food the personal data, contact information and details of the Slow Food experiences uploaded onto the Airbnb platform. By uploading the experience on the Airbnb platform, the host accepts that Slow Food can contact him/her in relation to the experience.

By prior consent, the host is registered for the association newsletter.

#### 14 Host families

The data of the host families are acquired through the application form for the "Hospitality" project to welcome the Terra Madre delegates. The data are used for

- ascertain that there are the necessary requirements to accept the membership
- organise the hospitality service also through volunteers appropriately appointed by the Data Controller.

The data of the host families (limited to e-mail address and telephone number) may be notified to the hosted delegate to create a contact before the event.

The data are stored until their removal is requested by the data subject and are used to send hospitality requests for subsequent editions.

Unless opposed, the reference person for each family is registered for the association newsletter.

### 15 Volunteers for events

Requests for participation as volunteers in events organized by Slow Food are handled with specially dedicated forms created for the different events (google form, confluence survey). Requests for participation are evaluated after verifying the personal data entered (personal, identification data, contact details, membership of associations, language skills, previous experience, etc.) in order to:

- ascertain the necessary requirements such as the compatibility between the skills of the volunteer and the
  operational needs of the event; verify membership of the Slow Food association or of a different association
  with which Slow Food has agreements in place, which is a binding requirement in order to accept the
  application. Should the interested party not belong to any association, the data controller reserves the right
  to propose membership to the Association, in order to be able to evaluate the application for participation as
  a volunteer presented by the data subject.
- Organizing and managing services. These aims may entail sharing a volunteer's contact data with suppliers
  entrusted with the organization and management of the service with whom volunteers have to operate and\or
  interface, or with delegates and guests of the event entrusted to the tutorship of the volunteers themselves.

The data are stored until their removal is requested by the data subject and the contact details are used to send participation requests as volunteers for further events organised by Slow Food.

Unless opposed, the volunteer is registered for the association newsletter.

### 16 Exhibitors, speakers, cooks, guests at fair events

The personal data collected are processed to carry out the activities strictly necessary to ensure the regular performance of the contractual relationship as well as of the services offered and enjoyed.

The contact details (e-mail address) of the guests of the exhibition (speakers, cooks, observers, etc.), subject to explicit consent, are used to send the association newsletter (see specific paragraph "Newsletter recipients" from which it is possible to subsequently unsubscribe).

#### **Exhibitors' data** (e-mail, telephone), **subject to explicit consent** are used for:

- Sending newsletters and communications of a promotional, commercial or sales-oriented nature, as well as
  for market researches carried out by post, telephone and also automated call systems, e-mail, fax, SMS or
  MMS by the joint controllers
- sending promotional and commercial communications by official Suppliers, Sponsors and Partners of the Exhibition
- sending the Slow Food association newsletter.

The transmission outside of the personal data collected for the declared purposes may only occur if such communication is necessary and / or mandatory in order to take part in the event and to correctly establish or continue the contractual relationship. For this purpose, they are also communicated to providers of official service, plant and equipment, and miscellaneous material suppliers whose intervention requires a direct contact with the exhibitor, which the controller has appropriately appointed as external processors.

Some suppliers of the data controller may provide services to the exhibitor and to the guests (cooks, speakers, observers) independently and directly. In these cases, for organisational reasons, the data controller requests that the supplier, by contractual agreement, transfers the information relating to the services which the exhibitor has purchased directly from them.

The data may be disclosed to public and private entities, natural and / or legal persons, with sales and / or IT management and / or payment system purposes, including external parties (collaborators, volunteers, sponsors, partners) who carry out specific tasks on behalf of the data controller. The data may also be disseminated, but only in aggregate, anonymous form and for statistical purposes.

Exclusively in relation to common personal data of the data subjects:

- they can be communicated to companies and publishers in order to publish the data in question;
- they are published in the official catalogue of the relevant reference event;
- they are published on the website of the relevant reference event.

In particular, the people of this category may also be the subject of video / photographic shoots during the event they take part in: see paragraph "18 Anyone in relation to their own photographic and video images".

## 17 Delegates

The completion of the application for participation as a Slow Food delegate, generally during the organised events, does not guarantee participation in the event itself. Nominations are evaluated by the event's organising committee in order to ascertain the necessary requirements (participation in Slow Food projects or campaigns, membership of Slow Food Convivia or Communities, the situation regarding Visas for travel to Italy), or information useful for organising the delegate's visit to the event (identification data and information concerning the candidate, language, hospitality and travel information).

The assessment of the requirements takes place at the discretion of the event's organising committee which can deny the candidate's participation as a delegate.

The data of the rejected applications are subsequently cancelled after having communicated the result of the candidacy to the data subject, with the exception of the identification and contact data required by the organiser to evaluate the applications for participation also from the point of view of the historical situation of the results. The delegates' data are kept until their removal is requested by the data subject and the contact details are used to send requests for participation as delegates to further events organised by Slow Food.

Unless opposed, the delegate is registered for the association newsletter (if he/she does not already receive it as a partner or member of the Community)

### 18 Anyone in relation to their own photographic and video images

As part of its associative, educational, institutional and promotional activities, including events organised by Slow Food of international relevance or of local importance, photographic images and videos concerning anyone may be collected.

The intent is, generally, to create a report which gives an account of the projects and of the activities carried out therein or of the fair event and not in particular to portray the individual persons (except in specific cases, such as for example the portraits of the cooks, the faces of Terra Madre delegates or of the Slow Food Presidia producers). Should audio / video filming and photographs of subjects in the foreground be carried out, consent and right to use will be requested.

Including but not limited to, photographic images and videos can be collected

- at the sites of the producers of the projects (processing plants, agricultural fields, farms, etc.)
- during planned activities, supported by funded projects (for example: Central Europe, Essedra, Food is Culture, etc.)
- at the locations where Slow Food project activities take place (for example: Orti in condotta, school gardens, Orti in Africa, Mercati della Terra, regional Terra Madre events, etc...)
- by appointed photographers at the events
- by volunteer photographers or people from the Slow Food network (project representatives, trustees, community members, etc.)
- at newspapers or third-party websites which take part in the event
- at "social media", such as social networks, on the occasion of and limited to the spaces used by trade fairs.
- at exhibitors, tasting classrooms and laboratories, educational spaces and conference rooms, within the
  events. For the protection of people, information boards are placed near the areas involved, warning of the
  presence of official photographers and video-makers.

#### These images may be used for:

- implementing publications relating to Slow Food projects or events;
- documenting the activities of Slow Food in the project reports;
- issuing press releases;
- creating promotional material;
- publications on social media and Slow Food websites;
- photographic exhibitions;
- archiving in imagelibrary.slowfood.it/ (Slow Food online photo archive);
- the institutional communication of the activities carried out during the event by means of dissemination or publication of audio / video footage and photographs in magazines, websites, social pages, etc., should this not concern shooting with subjects in the foreground or images which are detrimental to the dignity of the persons filmed, paying due care to the more vulnerable subjects (e.g. minors);
- security reasons for people and property (as a residual purpose)

Images and videos are processed as part of the normal institutional activity and according to legitimate interests. Anyone not wishing to be filmed is invited to leave the areas where shoots will take place.

## 19 Producers, businesses and representatives of Thematic Networks and Slow Food projects

- The personal data of the subjects involved in the projects and of the representatives of the Slow Food network, which make its development possible in the areas under their jurisdiction, are collected and processed:
- For the performance of the activities necessary to ensure the smooth performance of the relationship and projects, as well as the services offered and used, including through persons in charge of processing and data processors, on the basis of the agreement/pact to which the data subject has subscribed;
- For the disclosure of projects, including but not limited to images, audio and video recordings (see specific paragraph), through publication on Slow Food or Project Partners web domains, or other paper or digital editorial tools, Apps for smartphones or dedicated web apps.
   In addition, the personal and contact data (name, surname, email address, telephone) of producers, merchants and territorial contacts of the various projects are published in the descriptive sheets on the web pages dedicated to the projects and directly accessible from the relevant sites:
   Including but not limited to:

Presìdi	https://www.fondazioneslowfood.com/it/presidi-slow-food
Farms	https://www.slowfood.com/slow-food-farms
Arca del gusto	https://www.fondazioneslowfood.com/it/arca-del-gusto-slow-food
Mercati della Terra	https://www.fondazioneslowfood.com/it/mercati-della-terra-slow-food
Coffee Coalition	https://www.slowfood.com/thematic-network/coffee-coalition
Slow Wine Coalition	https://www.slowfood.com/thematic-network/slow-wine-coalition
Slow Fish Network	https://www.slowfood.com/thematic-network/slow-fish-network
Indigenous Peoples' Network	https://www.slowfood.com/thematic-network/indigenous-peoples- network
Migrant Network	https://www.slowfood.com/thematic-network/migrant-network
Orti in Africa	https://www.fondazioneslowfood.com/it/orti-in-africa-slow-food
Travel	https://www.fondazioneslowfood.com/it/cosa-facciamo/slow-food-travel

- For sharing the contact data with the interested or entitled convivia and Slow Food territorial coordination organisations, which can independently arrange to send their messages and notifications.
- If no one opposes, for the mailing of the newsletter containing participatory or associational information and news (see the specific paragraph);
- By prior consent, for sending commercial, promotional and sales-oriented communications of the joint controllers or of the reference project Partners.
- For notification, if necessary, of participation in workshops, webinars, and educational and training activities inherent to and functional for participation in the project adhered to by the person concerned

The data of the interested parties that belong to the Slow Food Movement Projects, located outside the European Union (EU) or the European Economic Area (EEA) will also be shared outside Italy.

# 20 Chefs and restaurateurs who are members of the Slow Food Cooks' Alliance project

The data acquired from the application form is used to register, evaluate and select the candidates. The submission of the application for membership does not ensure participation in the Alleanza dei Cuochi project, which will take place only if the selection by Slow Food is passed, by signing the declaration of adhesion.

Adherence to the project entails adherence to the Associazione Slow Food Italia as a member or participation in Slow Food at an international level as a participant.

The personal data collected are processed:

- to carry out the activities necessary to guarantee the regular performance of the Alliance relationship and project, as well as of the services offered and enjoyed
- for purposes of dissemination of the Slow Food Chefs Alliance project, including, on a non-exclusive basis, images and audio and video recordings, by publication on Slow Food web domains (in particular www.fondazioneslowfood.it/alleanza) or other printed or digital publishing tools, including Apps for smartphones or dedicated Web Apps.
- If no one opposes, for the mailing of the newsletter containing participatory or associational information and news (see the specific paragraph);
- For sharing the contact data with with relevant and entitled Slow Food local and regional associations in Italy and Local Groups and Territorial Offices at an international level interested or entitled, which can independently arrange to send their messages and notifications as autonomous data controllers
- By prior consent, for sending commercial, promotional and sales-oriented communications of the joint controllers or of the Slow Food Chefs Alliance project supporting Partners.
- the possible reporting of new educational and training activities similar to those in which the data subject has previously participated.
- For notification, if necessary, of participation in workshops, webinars, and educational and training activities inherent to and functional for participation in the Slow Food Chefs' Alliance project.

The data of subjects connected with the project situated outside the European Union (EU) or the European Economic Area (EEA) will be shared outside Italy too.

## 21 Participants in training courses and educational activities, workshops, conferences and webinars

This chapter describes the purposes of processing the data of participants in training courses organised by Slow Food in different design contexts, including within trade exhibitions. Including but not limited to:

- Educational activities during events
- Workshops
- Conferences
- Food to Action Academy
- Popular Taste Academy
- Training courses for Slow Food Gardens teachers

#### The personal data collected are processed:

- a) to carry out the activities necessary to ensure the smooth running of the relationship and of the training course, as well as of the services offered and enjoyed, including, (depending on the type of course offered)
- possibly sending follow-up communications about the course and for possibly sending the thematic newsletter of the project which the course refers to (see specific paragraph)
- b) for disseminating the project which the course refers to, including non-exclusive images and videos (see specific paragraph), through publication on Slow Food web domains or other printed or digital publishing tools.
- c) For the mailing of thematic project newsletters in accordance with the legitimate interest of the Data Controller in the event of enrolment on training courses which include said publications as tools for the promulgation and further study of the topics addressed by the course itself. By way of an example, albeit not

exhaustive, on enrolment participants in Slow Food Gardens training courses receive the Slow Food Gardens thematic newsletter.

In the case of online events and webinars, activities may be recorded in order to make their contents available and consultable after the training course/event has been completed. These contents must be disseminated among members and assignees or constitute evidence material for possible financial backers.

Possibly, depending on the type of course and always subject to explicit consent, the personal data collected can be processed:

- for the mailing of the newsletter providing participatory or associational information and news (see the specific paragraph);
- For sharing the contact data with the interested or entitled convivia and Slow Food territorial coordination organisations, which can independently arrange to send their messages and notifications.
- For sending communications of a commercial, promotional and sales-oriented nature of the joint controllers, or of the partners of the project.

## 22 Collaborators, people, premises and shops reported and mentioned in the Slow Food Editore Guides

The data are processed for the editions of the guides on the basis of the contractual relationships in the case of collaborators and on the basis of the legitimate interest in the case of the product sheets or the economic activities reviewed, bearing in mind that the personal data are limited to the contact ones. Some data are exclusively stored in the management systems of the publishing company for administrative-accounting and organisational-publishing purposes; the names and a few contact details, already public, are included in the guides and therefore distributed to all those who purchase these either in a paper version or in a digital version through the app.

The data can also be disseminated through IT tools (web and web app) or paper or other editorial tools, including by joint owners or project partners, as part of initiatives to signal, recommend food and wine itineraries or promote

### 23 Workers and candidates

lifestyles related to the movement.

Information is made available by the human resources office at the request of the data subjects and on the occasion of interviews and / or the establishment of the employment relationship. For reasons of confidentiality they are not published in this Privacy Policy.

## 24 Signatories of conventions, contracts, etc.

Personal data are collected directly from the data subjects and freely provided by them and from third parties (e.g. on the internet, from public registers, etc.). This information concerns personal data, contact details, telephone numbers, postal and e-mail addresses, identity documents and other documents concerning the possession of technical, professional and moral requirements, etc. Data subjects act as representatives of themselves or of other natural or legal persons as assignees with the undersigned or with a potential contractual counterpart, such as, for example, partners, customers, suppliers, even potential, public administrations, associations, etc. with whom there are interest, contractual and / or working relations with the Controllers. Personal data are processed to manage agreements, contracts and covenants for administrative and accounting purposes, including legal, contractual and pre-contractual obligations, as well as, based on legitimate interest, for purposes of contacting and maintaining relations and relationships, even beyond contractual obligations, e.g. for invitations to events and meetings.

## 25 Work contacts between partners, customers, suppliers, consultants, collaborators, journalists and public administrations, etc.

Personal data are collected directly from the data subjects and provided directly and freely by them and to third parties (e.g. on the internet, from public registers, online or paper forms for B2B, etc.). This information concerns personal data, contact details, telephone numbers, postal and e-mail addresses, identity documents and other documents concerning the possession of technical, professional and moral requirements, etc. Data subjects act on behalf of public administrations or even potential contractual counterparties (e.g. customers, suppliers, consultants, etc.) or partners, associations, newspapers, communication agencies, etc. with whom there are interest, contractual and / or working relations with the Controllers.

#### Personal data are processed:

- for communication between the undersigned organisation, including its staff, and the data subject and to comply with the legal, contractual and pre-contractual obligations between the parties within the normal activity provided for by the established relationship or relationship being established, such as for example: the management of customers and suppliers, including potential ones, carried out by entering them into company databases; the internal organisation of work; statistical processing; the obligations concerning civil, fiscal, tax, accounting, remuneration, social security, insurance regulations; sending memos and press releases regarding the activity of the contract for providing the services requested; to comply with instructions given by authorities legitimated to do so by law.
- for the purpose of contact and maintenance of relationships, even beyond contractual obligations, e.g. for invitations to events and meetings;
- for B2B and business matching purposes even during trade fair events. The data may be communicated and processed by appropriately appointed data controllers.

The data of journalists are handled exclusively by duly authorized Press Office personnel. The data are drawn from professional lists or supplied directly by individuals as part of the accreditation process in the occasion of events and/or initiatives. Data are handled to provide information about Slow Food events and initiatives, as well as to publicize news, press releases and updates regarding the whole Slow Food movement on a national and international scale.

## 26 Institutional and political positions within Slow Food

The personal data of the data subjects who hold institutional and political positions within the Slow Food Association are processed for the exclusive purposes of their mandate and in order to ensure the correct and full performance of the position. The data can be communicated and disseminated on the basis of the legitimate interest of the owner at all levels of association (local, regional, supra-regional, national, international), during association meetings - physical or virtual - (councils, assemblies, forums, etc.) and in all cases where communication is functional to the proper performance of the position held (at for example public and private institutions, suppliers, partners, exhibitors of events, producers and referents of Slow Food projects)

The personal and contact data of the legal representatives of Slow Food Italia Aps local and regional associations, Convivium leaders of Slow Food international organizations and Community spokespersons are published on the relevant websites.

The data of the data subjects are kept for the purposes set out above for the duration of the office. Upon termination of office, without prejudice to legal obligations, the data are kept for the exclusive purposes of historical archives of the Association. They can be used by the personnel in charge to contact the data subjects for reasons related to the association consequent or inherent to the position that the data subjects has held at the Association.

# 27 Any person, involved in accounting, tax, fiscal and social security obligations incumbent on one of the Controllers

The data of persons involved in certain activities for which specific data and records (e.g., data and accounting notes or invoices issued and received from customers, suppliers, administrators, collaborators, speakers, teachers and professionals, etc.) are required by legal regulations, especially accounting, tax, fiscal and social security regulations to be kept. ) are collected and processed to fulfill these legal obligations, including any communication from and to public entities (or those exercising public powers) according to regulatory requirements (e.g., electronic invoices are received and transmitted through the Italian Revenue Agency's interchange system; reporting documents are verified by the Control Bodies or the European Commission in the case of funding for Slow Food initiatives and projects) also through intermediaries appointed for this purpose. These compulsory data are retained until the expiration of the general legal limitation period that ends at the conclusion of the tenth fiscal year following the year in which it became necessary to process them.

#### **27.1 Transparency**

Handling applies to information and personal data regarding stakeholders qualified to ensure that, in the organizations, activities and projects are carried out in accordance with the laws of transparency applicable. Handling also includes the data of workers and candidates, as well as all persons involved in given activities as provided for by accounting, fiscal and welfare law.

Transparency is also guaranteed by the publication of detailed financial reports to ensure transparency in operations and verified by Watchdogs and the European Commission in the case of funding of Slow Food initiatives and projects.

## 28 Whistleblowing (in compliance with Decree no. 24/2023)

For some partners, an appropriate Management Organization Model is implemented to prevent the committing of crimes as provided for by Legislative Decree no. 231/2001 on "The administrative liability of bodies". In these Bodies an anonymous whistleblowing system is active with which conducts and events of a presumably illegal or improper nature may be brought to the attention of the Supervisory Board.

The personal data of whistleblowers are handled by the Supervisory Body tasked by the data controller in the execution of their duties of public interest or in any case connected with the exercise of their public powers, with special reference to the job of ascertaining any breaches of the law reported in the interest of the Body, in compliance with art. 54 bis of Legislative decree no. 165/2001, by subjects who, by virtue of their employment in the Body, learn about unlawful conduct.

Each whistleblowing system is equipped with a specific privacy informative reporting procedure, directly accessible through a dedicated whistleblowing link.

o For Slow Food Promozione Srl SB: <a href="https://privacy.slowfood.com/odv/slow-food-promozione/">https://privacy.slowfood.com/odv/slow-food-promozione/</a>