



Institute of Constructivist Psychology

**NOTE ON PROCESSING PERSONAL DATA IN PURSUANCE OF SECTION 13 OF
LEGISLATIVE DECREE 196/2003**

In pursuance of section 13 of Legislative Decree 196/2003, we inform you of the following:

1. The personal data you provide or that are acquired in the course of our work will be subject to processing which observes correctness, legality, transparency and the protection of your privacy and your rights.
2. The use of your personal data will have the following aims:
 - “Contacts” section of the www.icp-italia.it website and sites relating to www.icp-italia.it the data will be used so as to give an answer to your specific requests for information.
 - “Newsletter” section: the data will be processed, when provided by the client and when consent is given for it to be processed for the above mentioned purpose, so as to send promotional, informational and/or marketing messages to the user.
 - Restricted Area (Students, faculty and staff) registration in www.icp-italia.it : the data will be used to for educational purposes and organizational requirements for the activity of the Institute of Constructivist Psychology.
3. Personal data can also be used to send informational and advertising material, or for marketing communications involving new courses, workshop and events or updates to new aspects to preexisting courses.
4. Data processing can also be carried out with the help of electronic tools which are suitably equipped to guarantee the security and privacy of the data.
5. The provision of data is obligatory for the purposes set forth in point 2. If you refuse to supply us with your personal data or do not authorise their use, in whole or in part, this may mean that the contract is not completed in full or in part, or that the assignment is not carried out.
6. The consent to use data for the ends set forth in point 3 is optional and any refusal to supply us with the authorisation for this use cannot mean that a contract is not completed, either in part or in full, or that the assignment is not carried out.
7. Data can be communicated, exclusively for the ends indicated above, to specific subjects, including legal or tax advisers, banks and to the online ticketing manager so as to fulfil the obligations set forth above. Data can also occasionally become known by companies which are linked to us. The consent to have these data processed is obligatory, and failure to provide it will mean that it is impossible to carry out the service requested.
8. If, and only if, you have given your free and express consent, the data can also be communicated and/or passed to subsidiary companies, parent companies or affiliated companies of the Institute of Constructivist Psychology as well as third party companies working in the marketing sector, for informational and promotional purposes. Any



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refusal to provide us with the authorisation for this processing cannot entail the total or partial absence of fulfilment of the contract or the non-fulfilment of the assignment.

9. The data controller is Institute of Constructivist Psychology Srl, via Martiri della Libertà, 13 – Padova. The list of the processors of personal data can be requested from the data controller.

10. You can apply to the data controller or the manager to exercise your rights, as stipulated in section 7 of the Legislative Decree 196/2003.

Section 7–Right to Access Personal Data and Other Rights

1. A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him exist, regardless of their being already recorded, and communication of such data in intelligible form.

2. A data subject shall have the right to be informed:

a) of the source of the personal data;

b) of the purposes and methods of the processing;

c) of the logic applied to the processing, if the latter is carried out with the help of electronic means;

d) of the identification data concerning the data controller, data processors and the representative designated as per Section 5 (2);

e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.

3. A data subject shall have the right to obtain:

a) updating, rectification or, where interested therein, integration of the data;

b) erasure, anonymisation or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;

c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

4. A data subject shall have the right to object, in whole or in part:

a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;

b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

USE OF COOKIES ON THIS SITE

On this page the ways in which cookies are managed on this site are described. This is a note which is provided in compliance with Section 13 of Legislative Decree 196/2003 – Code on protection of personal data to those who interact with the web services of the Institute of Constructivist Psychology Srl accessible electronically at the address: <http://www.icp-italia.it> and for all its sites that relate to single events or special projects.



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This note is only provided for the websites and portals of Institute of Constructivist Psychology Srl and the companies linked to it e and not for other websites which might be viewed by the user through links.

The note also reflects Recommendation 2/2001 which the European Data Protection Authorities, meeting in the Working Party instituted by section 29 of Directive 95/46/EC, adopted on 17th May 2001 to identify some minimal requirements for gathering personal data on-line, and, in particular, the means, timeframe and type of information that the Data Controllers have to provide to users when they connect to web pages, regardless of the purpose of that connection. The regulations given by the Italian Data Protection Authority in the provision dated 8 May 2014 (published in the Official Gazette number 126 of 3 June 2014) in relation to simplified ways of notification and acquiring consent for the use of cookies have been incorporated into this Privacy Policy.

THE DATA “CONTROLLER”

After consulting this site, data relating to identified or identifiable people can be processed. The “controller” of the processing is the Institute of Constructivist Psychology Srl, Via Martiri della Libertà, 35137 Padova.

PLACE WHERE DATA IS PROCESSED

Processing connected to the web services of this site takes place at the aforementioned company sites and at its subsidiaries and is only done by people who are tasked with processing, or by those who might be tasked with occasional maintenance operations and by those who may be named as “external data processors” with the appropriate documentation. No data deriving from the web service is communicated or spread. The personal data provided by users who send requests for informational material to be sent (publications, newsletters, answers to queries, etc.) are only used to undertake the service or services required and are only communicated to third parties if needed for that purpose (services of sending and delivery).

KIND OF DATA PROCESSED

Navigation data:

This information is not gathered so as to be associated to identifiable individuals but is information which –through its very nature –could allow users to be identified through processing and linking with data held by third parties. Falling in this data category are the IP addresses or the domain names of computers used by users who connect to the site, the URI (Uniform Resource Identifier)addresses of the resources requested, the time of the request, the method used to make the request to the server, the size of the file obtained in response, the numerical code showing the status of the answer given by the server (successful outcome, error, etc.) and other parameters relating to the operating system and the user's computer environment.

These data are only used to produce anonymous statistical information on the use of the site and to ensure its correct functioning and are cancelled immediately after their creation. The data can theoretically be used to attribute responsibility in the event of computer crime which damaged the site: except for this case, and as it stands, data on web contacts do not exist for more than seven days.



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Data voluntarily provided by the user:

The optional, clear and voluntary sending of an e-mail to the addresses indicated or through questionnaires to be compiled on this site, signifies the subsequent acquisition of the address of the sender, which is needed to reply to requests, as well as any other personal data included in the message or its questionnaires. Specific summary information will be progressively relayed or visualised in the pages of the website designated for particular services that are requested.

COOKIES

Cookies are small strings of code that websites visited by users send to their terminals (normally to the browser), where they are memorised to then be retransmitted to the same sites the next time the same user visits those sites. While logged on to a site, users can also receive cookies on their terminal which are sent by different sites or web servers (so-called “third parties”), in which some elements can remain (such as, for example, images, maps, sounds, specific links to pages of other domains) present on the site which the user is visiting.

Cookies, which normally exist in very large numbers in users' browsers and sometimes last a considerable time, are used for various different purposes: carrying out digital identification, monitoring sessions, memorising information on specific configurations involving users who go on to the server, etc. So as to obtain proper control of these devices, it is necessary to distinguish them in terms of the purpose of those who use them, given that they do not have any distinguishing technical features (provision of the Data Protection Authority, 8th May 2014, number 229).

We notify you that our website uses the following cookies, divided up according to their purpose:

- So-called “essential” cookies: they belong to the technical group of cookies and are those cookies that allow the webpages to function. It is possible to deactivate these cookies, but we must point out that in their absence the functioning and navigation of this website would be effectively impossible.
- Optimisation cookies: these are also technical cookies and included in them are the cookies which are used to gather information of a statistical nature and that are gathered in an aggregated way. These cookies have the sole purpose of improving the performance of the site itself. For example, optimisation cookies are considered to be those used to identify the pages on the website which are most visited and allows the website owner to structure the layout to assist consultation. Also belonging to this classification are those third party cookies that have the same role (for example, Google Analytics and similar, only in the case in which anonymous data are processed in an aggregated way).
- Third party cookies: these are all those cookies which are not directly received from the owner's website, but rather by websites managed by other companies or entities. Also included in third party cookies are the so-called “social plugins”. These are parts of pages which are visited which are generated directly by the aforementioned sites and integrated into the page of the host page. Social plugins are used to make the sharing of contents on various social networks possible. The presence of these plugins entails the transmission of cookies from and to all the sites managed by third parties. The management of the



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information gathered by “third parties” is governed by the relevant information, to which you are asked to refer. In the www.icp-italia.it website and websites for the events and special projects organised and managed by it, the following “social plugins” are used: for Instagram, LinkedIn, Google Analytics, Vimeo, Pinterest, Twitter, Facebook, Youtube, Tumblr, Google+, Flickr.