

## Website Privacy Policy

(DATACONTROLLER =) Trust-IT Ltd, with registered offices in Chase Green House, 42 Chase Side Enfield, Middlesex EN2 6NF United Kingdom, VAT no. and Fiscal Code VAT: 848450895, is committed to protecting the online privacy of the users of this website (“**Website**”).

As such, this Privacy Policy has been written in order to allow you to understand Trust-IT’s policy regarding your privacy, as well as how your personal information will be handled when using the Website. This Privacy Policy will also provide you with information so that you are able to consent to the processing of your personal data in an explicit and informed manner, where appropriate.

In general, any information and data which you provide to Trust-IT over the Website, or which is otherwise gathered via the Website by Trust-IT, in the context of the use of Website’s services (“**Services**”) as better defined in [Section 3](#) below, will be processed by Trust-IT in a lawful, fair and transparent manner. To this end, and as further described below, Trust-IT takes into consideration internationally recognised principles governing the processing of personal data, such as purpose limitation, storage limitation, data minimisation, data quality and confidentiality.

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## 1. Data controller

Trust-IT, as identified at the top of this Privacy Policy, is the data controller regarding all personal data processing carried out through the Website. You can contact Trust-IT with any questions related to this Privacy Policy or the Trust-IT’s personal data processing practices by sending a written communication to [info@phidias-hpc.eu](mailto:info@phidias-hpc.eu), or via the contact forms available on the Website.

## 2. Personal Data processed

When you use the Website, Trust-IT will collect and process information regarding you (as an individual) which allows you to be identified either by itself, or together with other information which has been collected. Trust-IT may also be able to collect and process information regarding other persons in this same manner, if you choose to provide it to Trust-IT, also via the Website.

This information may be classified as “**Personal Data**” and can be collected by Trust-IT both when you choose to provide it (e.g., when you subscribe to the newsletter or request other Services provided by Trust-IT over the Website) or simply by analysing your behaviour on the Website.

Personal Data which can be processed by Trust-IT through the Website are as follows:

### a. Name, contact details and other Personal Data

In various areas of the Website – including, in particular, if you decide to create an account on the Website – you will be asked to submit information about yourself, such as your name, professional title, organisation name/type, primary (and secondary) domain of work/expertise, e-mail address, city/country of residence, address, gender, Twitter handle, LinkedIn profile, and picture. Mandatory fields will be marked as such in the online registration forms – it is not possible to process your registration if any of the mandatory fields are left incomplete.

In addition, whenever you communicate with Trust-IT by submitting a general enquiry or a support ticket via the Website, as well as whenever you participate in surveys which may be available on the Website, Trust-IT may collect additional information which you choose to provide.

Regarding any applications received, Trust-IT may assess the professional social media accounts (e.g. LinkedIn, Twitter) or professional websites of candidates, where publicly available or disclosed by the candidate, as necessary to gain insight as to a candidate’s suitability for the position/function to which the candidate applied.

When signing up for an event via the Website (such as a workshop organised or promoted by the Website), you will also be asked to provide details such as your name, your Twitter handle, the dates on which you will be attending and other information of relevance for the management of your attendance. Your payment details (including debit/credit card number and bank account details as needed) will be processed via an external payment gateway.

### b. Special categories of Personal Data

When signing up for an event via the Website (such as a workshop organised or promoted by the Website), you will also be asked whether you have any special dietary/access requirements which might need accommodation. These Personal Data may potentially qualify as “health data” or “data revealing your religious/philosophical beliefs”, which are special categories of personal data under Art. 9 GDPR, and will be processed only with your explicit consent.

Certain areas of the Website may include free text fields, where you can write messages to Trust-IT or otherwise allow you to post various types of content on the Website, which may contain Personal Data. Where these fields are completely free, you may use them to disclose (inadvertently or not) more sensitive categories of Personal Data, such as data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. The content you upload in

these fields may also (inadvertently or not) include other types of sensitive information relating to you, such as your genetic data, biometric data or data concerning your health, sex life or sexual orientation.

Trust-IT asks that you do not disclose any sensitive Personal Data on the Website, unless you consider this to be strictly necessary. As it is totally optional to provide this information, if you nonetheless choose to do so, please mind that Trust-IT requires your **explicit consent** to process this sort of Personal Data (which can be provided, e.g., by declaring that you “explicitly consent to the processing of my special categories of personal data for the purpose of assessing my candidacy”).

### **c. Other persons’ Personal Data**

As mentioned in the previous section, certain areas of the Website include free text fields where you can write messages to Trust-IT, or otherwise allow you to post various types of content on the Website. These messages and content may (inadvertently or not) include Personal Data related to other persons.

In any situation where you decide to share Personal Data related to other persons, you will be considered as an independent data controller regarding that Personal Data and must assume all inherent legal obligations and responsibilities. This means, among other things, that you must fully indemnify Trust-IT against any complaints, claims or demands for compensation for damages which may arise from the processing of this Personal Data, brought by the third parties whose information you provide through the Website.

As Trust-IT does not collect this information directly from these third parties (but rather collects them, indirectly, from you), you must make sure that you have these third parties’ consent before providing any information regarding them to Trust-IT; if not, then you must make sure there is some other appropriate grounds on which you can rely to lawfully give Trust-IT this information.

### **d. Browsing data**

The Website’s operation, as is standard with any websites on the Internet, involves the use of computer systems and software procedures, which collect information about the Website’s users as part of their routine operation. While Trust-IT does not collect this information in order to link it to specific users, it is still possible to identify those users either directly via that information, or by using other information collected – as such, this information must also be considered Personal Data.

This information includes several parameters related to your operating system and IT environment, including your IP address, location (country), the domain names of your device, the type of device, the URI (Uniform Resource Identifier) addresses of resources you request on the Website, the time of requests made, the method used to submit requests to the server, the dimensions of the file obtained in response to a request, the numerical code indicating the status of the response sent by the server (successful, error, etc.), and so on.

These data are used to compile statistical information on the use of the Website, to ensure its correct operation, as well as restore backup from possible failures of the Website and identify any faults and/or abuse of the Website. Save for this last purpose, these data are not kept for more than 60 business days.

### **e. Cookies**

*- Definitions, characteristics, and application of standards*

Cookies are small text files that may be sent to and registered on your computer by the websites you visit, to then be re-sent to those same sites when you visit them again. It is thanks to these cookies that those websites can “remember” your actions and preferences (e.g., login data, language, font size, other display settings, etc.), so that you do not need to configure them again when you next visit the website, or when you change pages within a website.

Cookies are used for electronic authentication, monitoring of sessions and storage of information regarding your activities when accessing a website. They may also contain a unique ID code which allows tracking of your browsing activities within a website, for statistical or advertising purposes. Some operations within a website may not be able to be performed without the use of cookies which, in certain cases, are technically necessary for operation of the website.

When browsing a website, you may also receive cookies from websites or web servers other than the website being visited (i.e., “**third-party cookies**”).

There are various types of cookies, depending on their characteristics and functions, which may be stored on your computer for different periods of time: “**session cookies**”, which are automatically deleted when you close your browser, and “**persistent cookies**”, which will remain on your device until their pre-set expiration period passes.

According to the law which may be applicable to you, your consent may not always be necessary for cookies to be used on a website. In particular, “**technical cookies**” – i.e. cookies which are only used to send messages through an electronic communications network, or which are needed to provide services you request – typically do not require this consent. This includes browsing or session cookies (used to allow users to login) and function cookies (used to remember choices made by a user when accessing the website, such as language or products selected for purchase).

On the other hand, “**profiling cookies**” – i.e., cookies used to create profiles on users and to send advertising messages in line with the preferences revealed by users while browsing websites – typically require specific consent from users, although this may vary according to the applicable law.

*- Types of cookies used by the Website*

The Website uses the following types of cookies:

- **Browsing or session cookies**, which are strictly necessary for the Website’s operation, and/or to allow you to use the Website’s content and Services.
- **Analytics cookies**, which allow Trust-IT to understand how users make use of the Website, and to track traffic to and from the Website.

Trust-IT also uses **third-party cookies** – i.e. cookies from websites / web servers other than the Website, owned by third parties. These third parties will either act as independent data controllers from Trust-IT regarding their own cookies (using the data they collect for their own purposes and under terms defined by them) or as data processors for Trust-IT (processing personal data on Trust-IT’s behalf).

For further information on how these third parties may use your information, please refer to their privacy policies:

- **LinkedIn**

- **Privacy Policy:** <https://www.linkedin.com/legal/cookie-policy> ;
- **Opt-out Mechanism:** [https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out?trk=microsites-frontend\\_legal\\_cookie-policy](https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out?trk=microsites-frontend_legal_cookie-policy) .

- **Twitter**

- **Privacy Policy:** <https://help.twitter.com/en/rules-and-policies/twitter-cookies> ;
- **Opt-out Mechanism** (Digital Advertising Alliance / Network Advertising Initiative): <http://optout.aboutads.info> ; <http://optout.networkadvertising.org/?c=1> .

- **Youtube**

- **Privacy Policy:** <https://www.youtube.com/about/policies/#community-guidelines> ;
- Youtube videos have privacy-enhanced mode enabled: therefore YouTube won't store information about our visitors, unless they play the video, according to the Google-Youtube guide: <https://support.google.com/youtube/answer/171780?hl=en-GB>

The list of installed cookies is available in the Cookie Policy on the Website

- *Cookie settings*

You can block or delete cookies used on the Website via your browser options. Your cookie preferences will be reset if different browsers are used to access the Website. For more information on how to set the preferences for cookies via your browser, please refer to the following instructions:

- [Chrome](#)
- [Firefox](#)
- [Internet Explorer](#)
- [Safari](#)

You may also provide set your preferences on third-party cookies by using online platforms such as [AdChoice](#).

**CAUTION** If you block or delete **technical** and/or **function cookies** used by the Website, the Website may become impossible to browse, certain services or functions of the Website may become unavailable or other malfunctions may occur. In this case, you may have to modify or manually enter some information or preferences every time you visit the Website.

### **3. Purposes of processing**

Trust-IT intends to use your Personal Data, collected through the Website, for the following purposes:

1. To allow you to create and maintain a registered user profile on the Website, to allow you to participate in different areas over the Website and exchange information/documents with other participants, to verify your identity and assist you, in case you lose or forget your login / password details for any of the Website's registration services, to send you informative newsletters and other communications (linked to the collaborative areas which you participate in), to respond to your

enquiries and requests for support, and to provide any other Services which you may request (“**Service Provision**”);

2. To process your sign-up/registration forms for events and webinars hosted or supported by the Website, process your payment details for associated fees, track event attendance and publish attendee lists online (“**Events/Webinars**”);

3. To assess applications submitted via the Website, such as collaborating opportunities or for participating to events organised or sponsored by the Website, among others (“**Applications**”);

4. For marketing, promotional and publicity purposes, including to carry out direct marketing, market research and surveys, via e-mail, through push notifications / pop-up banners, through the Website’s official social media pages, [...], regarding upcoming events organised by the Website, as well as events hosted by selected third parties (“**Marketing**”);

5. To include information on you as a registered Member within the Website database (“**Database Publication**”);

6. For future marketing, promotional and publicity purposes, by sending you direct e-mail marketing communication regarding events hosted and Services provided by the Website and which are of an identical or similar scope to those which you have previously signed up for or acquired via the Website (“**Soft Opt-in**”);

7. To create a profile of you as a Website user, through the use of profiling cookies and by collecting and analysing information on the preferences you select and choices you make in the Website, as well as your general activities on the Website. This profile will be used to give you information about other websites / services you may be interested in, and to show you information and advertisements which may be relevant to you and your interests. All algorithms involved in this processing are regularly tested, to ensure the processing’s fairness and control for bias (“**Profiling**”);

8. For compliance with laws which impose upon Trust-IT the collection and/or further processing of certain kinds of Personal Data (“**Compliance**”);

9. For development and administration of the Website, in particular by use of data analytics regarding how you and other users make use of the Website, as well as the information and feedback you provide, to improve our offerings (“**Analytics**”);

10. To prevent and detect any misuse of the Website, or any fraudulent activities carried out through the Website, including by carrying out internal audits (“**Misuse/Fraud**”).

## **4. Grounds for processing and mandatory / discretionary nature of processing**

Trust-IT’s legal bases to process your Personal Data, according to the purposes identified in [Section 3](#), are as follows:

1. **Service Provision** : processing for these purposes is necessary to provide the Services and, therefore, is necessary for the performance of a contract with you – Art. 6(1)(b) GDPR. It is not

mandatory for you to give Trust-IT your Personal Data for these purposes; however, if you do not, Trust-IT will not be able to provide any Services to you.

2. **Events/Webinars**: processing for these purposes is generally necessary to allow the Trust-IT Team to respond to your request to sign up for an event/webinar and, therefore, is necessary for the performance of a contract with you – Art. 6(1)(b) GDPR. However, the tracking of event attendance and publication of attendee lists is done on the basis of the Website’s interests in managing events and allowing other participants to become aware of persons taking part at the event – Art. 6(1)(f) GDPR. It is not mandatory for you to give Trust-IT your Personal Data for these purposes; however, if you do not, Trust-IT will not be able to process your registration for an event/webinar.

3. **Applications**: processing for this purpose is needed in order for Trust-IT to be able to consider your application and, therefore, is necessary to take steps at your request before (potentially) entering into a contract – Art. 6(1)(b) GDPR. It is not mandatory for you to give Trust-IT your Personal Data for these purposes; however, if you do not, Trust-IT will not be able to consider your applications.

4. **Marketing**: processing for these purposes is based on your consent – Art. 6(1)(a) GDPR. It is not mandatory for you to give consent to Trust-IT for use of your Personal Data for these purposes, and you will suffer no consequence if you choose not to give it (aside from not being able to receive further marketing communications from Trust-IT). Any consent given may also be withdrawn at a later stage (please see [Section 8](#) for more information).

5. **Database Publication**: processing for this purpose is based on your consent – Art. 6(1)(a) GDPR. It is not mandatory for you to give consent to Trust-IT for use of your Personal Data for these purposes, and you will suffer no consequence if you choose not to give it. Any consent given may also be withdrawn at a later stage (please see [Section 8](#) for more information).

6. **Soft Opt-In** : processing for these purposes is based on Trust-IT’s interest in sending you direct e-mail marketing communication regarding events and Services provided by Trust-IT and which are identical or similar to those you have previously signed up for or acquired through the Website – Art. 6(1)(f) GDPR. You can block these communications, and you will suffer no consequence if you do so (aside from not being able to receive further communications from the Website), by objecting through the link provided at the bottom of all such communications.

7. **Profiling**: processing for this purpose is based on your consent, collected by means of the cookie pop-up banner and/or a specific tick box – Art. 6(1)(a) GDPR. It is not mandatory for you to give consent to Trust-IT for use of your Personal Data for this purpose, and you will suffer no consequence if you choose not to (aside from not being able to benefit from greater personalisation of your user experience regarding the Website). Any consent given may also be withdrawn at a later stage (please see [Section 8](#) for more information).

8. **Compliance**: processing for this purpose is necessary for Trust-IT to comply with its legal obligations – Art. 6(1)(c) GDPR. When you provide any Personal Data to Trust-IT, Trust-IT must process it in accordance with the laws applicable to it, which may include retaining and reporting your Personal Data to official authorities for compliance with tax, customs or other legal obligations.

9. **Analytics**: Information collected for this purpose is used to allow Trust-IT to understand how users interact with the Website and to improve the Website accordingly, with the aim to providing a better user experience – Art. 6(1)(f) GDPR.

10. **Misuse/Fraud**: Information collected for this purpose is used exclusively to prevent and detect fraudulent activities or misuse of the Website (for potentially criminal purposes) – Art. 6(1)(f) GDPR.

## 5. Recipients of Personal Data – Data Processors

Your Personal Data may be shared with the following list of entities (“**Data Processors**”):

- The following entities are engaged in order to provide or support the Website and Services (e.g., hosting providers, e-mail platform providers, technical maintenance providers Website administrators and Website user administrators):
- Trust-IT srl, via Nino Bixio 25, 56125 Pisa (PI) Italy. CF and PIVA: 01870130505
- COMMpla srl, via Nino Bixio 25, 56125 Pisa (PI) Italy. CF and PIVA: 01958380501

## 6. Other Recipients of Personal Data

Your Personal Data may be shared with the following list of persons / entities (“**Recipients**”):

- Persons, companies or professional firms providing the Trust-IT with advice and consultancy regarding accounting, administrative, legal, tax, financial and debt collection matters related to the provision of the Services and which act typically as data processors on behalf of the Trust-IT;
- Persons authorised by Trust-IT to process Personal Data needed to carry out activities strictly related to the provision of the Services, who have undertaken an obligation of confidentiality or are subject to an appropriate legal obligation of confidentiality (e.g., members of the team operating the Website, and other functions with access to Personal Data processed via the Website);
- Public entities, bodies or authorities to whom your Personal Data may be disclosed, in accordance with the applicable law or binding orders of those entities, bodies or authorities.

Additionally, with your consent, some of your Personal Data may be published in the webpages available online at the Website. Furthermore, when you sign-up for an event, you will be listed in attendee lists made available on the Website.

More information on these transfers is available upon written request to the Website Managing Team at the following address: [info@phidias-hpc.eu](mailto:info@phidias-hpc.eu).

## 7. Retention of Personal Data

Personal Data processed for **Service Provision** and **Events/Webinars** will be kept by Trust-IT for the period deemed strictly necessary to fulfil such purposes – in any case, as these Personal Data are processed for the provision of the Services, Trust-IT may continue to store this Personal Data for a longer period, as may be necessary to protect Trust-IT’s interests related to potential liability related to the provision of the Services.

Personal Data processed for **Applications** will be kept by Trust-IT for up to 5 years. Trust-IT may contact applicants before the expiration of this period, in order to request an extension of the retention period.

Personal Data processed for **Database Publication, Marketing** and **Profiling** will be kept by Trust-IT from the moment you give consent until it is withdrawn. Where it is not withdrawn, consent will be renewed at fixed intervals. Once consent is withdrawn (or not given, following a renewal),

Personal Data will no longer be used for these purposes, although it may still be kept by Trust-IT in particular as may be necessary to protect Trust-IT's interests related to potential liability related to this processing.

Personal Data processed for **Soft Opt-In** will be kept by Trust-IT from the moment where it is provided by you to Trust-IT (in the context of registrations for events or Services requested via the Website) until you object to this processing. Once you have objected, Personal Data will no longer be used for these purposes, although it may still be kept by Trust-IT, in particular as may be necessary to protect Trust-IT's interests related to potential liability related to this processing.

Personal Data processed for **Compliance** will be kept by Trust-IT for the period required by the specific legal obligation or by the applicable law.

Personal Data processed for preventing **Misuse/Fraud** will be kept by Trust-IT for as long as deemed strictly necessary to fulfil the purposes for which it was collected.

More information on applicable retention periods is available upon written request to the Website Managing Team at the following address: [info@phidias-hpc.eu](mailto:info@phidias-hpc.eu).

## 8. Data subjects' rights

As a data subject, you are entitled to exercise the following rights before Trust-IT, at any time:

1. Access your Personal Data being processed by Trust-IT (and/or a copy of that Personal Data), as well as information on the processing of your Personal Data;
2. Correct or update your Personal Data processed by Trust-IT, where it may be inaccurate or incomplete;
3. Request erasure of your Personal Data being processed by Trust-IT, where you feel that the processing is unnecessary or otherwise unlawful;
4. Request the restriction of the processing of your Personal Data, where you feel that the Personal Data processed is inaccurate, unnecessary or unlawfully processed, or where you have objected to the processing;
5. Exercise your right to portability: the right to obtain a copy of your Personal Data provided to Trust-IT, in a structured, commonly used and machine-readable format, as well as the transmission of that Personal Data to another data controller;
6. Object to the processing of your Personal Data, based on relevant grounds related to your particular situation, which you believe must prevent Trust-IT from processing your Personal Data; or
7. Withdraw your consent to processing (for **Marketing, Database Publication, Soft Opt-in, and Profiling**).

Please note that most of the Personal Data you provide to Trust-IT can be changed at any time, including your e-mail preferences, by accessing, where applicable, your user profile created on the Website.

You can also withdraw consent for **Marketing** (for communications received via e-mail) or object to **Soft Opt-In** by selecting the appropriate link included at the bottom of every marketing e-mail message received. The same applies to the Website's newsletter which you may have subscribed to and receive as a Service.

Consent for **Profiling** carried out by cookies may be withdrawn as described in Section 2(e). Where consent for **Profiling** was given via a specific tick box, you may withdraw this consent by changing your preferences, at any time, within your user profile created on the Website, where applicable.

Aside from the above means, you can always exercise your rights described above by sending a written request to the Website Managing Team at the following address: [info@phidias-hpc.eu](mailto:info@phidias-hpc.eu).

In any case, please note that, as a data subject, you are entitled to file a complaint with the competent supervisory authorities for the protection of Personal Data, if you believe that the processing of your Personal Data carried out through the Website is unlawful.

## **9. Amendments**

This Privacy Policy entered into force on 01/02/2020

Trust-IT reserves the right to partly or fully amend this Privacy Policy, or simply to update its content, e.g., as a result of changes in applicable law. The Website Managing Team will inform you of such changes as soon as they are introduced, and they will be binding as soon as they are published on the Website. The Website Managing Team therefore invites you to regularly visit this Privacy Policy in order to acquaint yourself with the latest, updated version of the Privacy Policy, so that you may remain constantly informed on how Trust-IT collects and uses Personal Data.