

PRIVACY NOTICE ARTICLE 13 GDPR – EXPLORERS/TEMPORARY CITIZENS

Pursuant to Article 13(1) (a) to (f) of the EU General Data Protection Regulation (GDPR), where personal data relating to a data subject are collected from the data subject, the controller shall provide the data subject with information regarding the processing of their data. Therefore, we fully comply with this requirement by informing you of the following:

The data controller is RAVENNA INCOMING Convention & Visitors Bureau

With registered office in Ravenna – 48124 (RA), Italy, Via Medulino 7

Local business unit located in Ravenna – 48121 (RA), Italy, Via Corrado Ricci 29

VAT no.: 02095290397 - Certified e-mail: ravennaincoming@pec.it Ordinary e-mail: footprints@visitravenna.it - Tel.: +39 0544/421247

The legal basis for collecting data is:

- Pre-contractual, contractual, organisational/administrative requirements with the participants
- A legal obligation the company is subject to
- A legitimate interest of the controller
- The explicit consent given by the data subject for one or more purposes

The data are collected for the following purposes, by giving explicit consent where required by law:

- Receiving, registering, managing and assessing applications, and notifying the results of the selection process for the applicant's participation as Explorer/Temporary Citizen within WP5
- Fulfilling legal obligations and complying with the EU regulations and legislation
- Managing the participant's stay, planning activities and fulfilling obligations arising from bookings management, service provision and events management, as well as to give the participant the best possible experience
- Fulfilling obligations arising from a contract or pre-contractual relationship, when the participant is selected as an Explorer and the relation between the parties and with the project and service partners involved is formalised
- Reporting on and monitoring the FOOTPRINTS project funded by the European Union
- Signing up to the APP/WEBAPP that will guide the participant through the Explorer experience
- Sending technical and service information concerning the participant's stay
- Collecting feedback and reviews useful for improving the services provided and gathering the participant's ideas and suggestions
- Sending institutional and promotional messages concerning the project and related experiences, within the limits of Article 7.6 of the Project Regulation

The categories of data that we process are:

- **Personal data** identification and contact details of the contact person (*i.e. first and last name, e-mail, country, region*), which will also be necessary for administrative and reporting purposes, as well as for guest registration purposes pursuant to Article 109 of the Italian Consolidated Law on Public Security (TULPS) and to Ministerial Decree of 7.01.2013
- **Special data** (*pursuant to Article 9 GDPR – sensitive data*) on the identification card collected for the participant's registration and application, or to provide them with customised services and facilities in case of disability or special health needs
- **Data relating to vulnerable data subjects** (*minors, disabled people and other protected categories involved in the participant's travel experience*)
- **General data relating to the applicant and the group** number of members, age, family unit, organisational preferences and date availability
- **Data collected during the activities** (*i.e. through surveys, interviews, operating log of digital tools, when used*)
- **Images, videos and testimonials** collected during the project activities, within the limits of the authorisations granted

☐ By accepting this privacy notice and by ticking the boxes on the EUSurvey platform where the application form is available, the applicant hereby **authorises the controller** to process their data, as listed above, and more specifically their sensitive data, and declares to possess all the authorisations necessary for processing and providing data relating to minors, where involved.

☐ The data controller accepts no responsibility for any incorrect data relating to third parties involved by the applicant in their travel experience. By accepting this privacy notice, the applicant/contact person, as the only party responsible for communicating with the organisers, declares that they have been authorised by the group members to provide their data.

☐ For additional details on the processing, use and dissemination of image data, read the specific release form, which can be accessed through the link available on the application form and on the EUSurvey platform.

Non-discrimination and sampling:

Data processing for selection and sampling purposes is done **in accordance with the EU directives on non-discrimination, ensuring equal access and scientific sampling criteria consistent with the goals of WP5. The data concerning the data subject will not be used for profiling purposes**, nor will they be collected to take automated or discriminatory decisions that produce legal effects or significantly affect the data subject or their personal preferences. Personal data will only be used (as referred to in item 2b) of the Project Regulation) to select explorer(s) and project participant(s).

Methods of processing:

The data may be processed using computerised, non-computerised and telematic means, and stored in digital or paper format. Special attention will be paid to restricting access to the data and to protecting documents, also by employing enhanced measures to protect sensitive information. **The data controller will implement all the security measures required to prevent unauthorised access, dissemination, modification or destruction of personal data. Personal data will not be shared with third parties for any purposes other than those set out in this privacy notice.**

Transfer of data: Personal data in digital form are stored on a server located in the European Union. These data may be used to book services and events through dedicated software programmes whose **providers have been appointed external data processors pursuant to Article 28 GDPR and provide sufficient security measures as required by law.** Any transfer of personal data outside of the EU will be done in accordance with the requirements set out in Chapter V GDPR (adequacy decisions or standard contractual clauses).

The recipients or categories of recipients are:

- Local authorities and law enforcement agencies for guest registration purposes, and insurance companies
- Duty informed and trained company personnel, carriers and transportation companies
- Hardware and software maintenance and/or repair companies and Internet and Web service providers
- Firms, companies and associations of enterprises or entrepreneurs providing accounting and/or tax services
- Partners acting as independent data controllers for the purposes within their authority and businesses the company works with or whose involvement is necessary for the performance of the contract/service
- Specific project partners that are appointed external data processors pursuant to Article 28 GDPR. The full list of the said partners is appended to the controller's register of processing activities.

Data storage period:

- Data collected to register your application ☐ stored for the time necessary to process your application until the closing date of applications to choose the explorers
- Data collected to sign you up to the APP/WEBAPP and to manage the project activities ☐ stored until the end of your explorer's experience
- Data collected to fulfil contractual and legal obligations, as well as reporting and storing requirements relating to the project ☐ 10 YEARS
- Data collected to settle disputes ☐ Until the dispute is resolved

☐ Afterwards, the data will be erased and anonymised. **All data that are not necessary for the purposes listed above will be erased once your travel experience ends.**

Right of the data subject: The data subject has the right to request access to and rectification and erasure of their personal data, as well as restriction of processing, and to object to data processing and data portability. To exercise these rights and request the full list of data processors and parties with whom the data may be shared and who will process your data for the purposes listed above, you can use the contact information provided in the heading. You have the right to lodge a complaint with a supervisory authority and to not be subject to decisions based solely on automated processing, including profiling.

Given that the legal basis for processing your data is also your consent (Article 6(1) (a) or Article 9(2) (a)), you have the right to withdraw your consent at any time without prejudice to the lawfulness of processing based on consent given prior to your withdrawal.

Nature of data provision: You shall provide at least the data relating to you or to the members of your group that are marked with an asterisk (required fields). This is necessary to manage and register your application. Therefore, failure on your part to provide the said data will result in us being unable to register you, as specified also in the Project Regulation.

Failure to provide the required consent (after reading and accepting Regulation, Privacy Notice and Image Release Form) **will prevent you from submitting your application.**

Updated on 14.10.2025

RAVENNA INCOMING Convention & Visitors Bureau
The legal representative