



Tondo^{LAB} privacy policy

Privacy Policy

At Tondo^{LAB} we are aware of the importance of your personal data and therefore we are committed to treating them with the utmost care so as to ensure their security and confidentiality.

With this information on the processing of personal data, which is provided in accordance with Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter for simplicity "the Regulation"), we would like to describe the manner and logic by which we process the personal data of users of the website <https://www.tondo.tech/> (hereinafter for brevity also only "the Site" or "the Platform").

This information is provided to all users who, by interacting with the Site, provide their personal data.

Some initiatives organized or promoted by Tondo^{LAB}, such as Hackathons, may involve different processing of personal data than those described here. For this reason, specific conditions will apply to such initiatives, in addition to or as an alternative to what is described below, of which specific information will be, from time to time, provided.

This notice does not extend to other websites that you may access through links on the Site.

Data controller

The data controller is Tondo^{LAB} (hereinafter also "the Data Controller") (P.IVA 10561680967) in the person of its legal representative pro tempore, based in Milan, Corso Indipendenza 5, 20129.

Types of data processed

A. Navigation data

The computer systems and software procedures used to operate this Site acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes the IP addresses or domain names of the computers and terminals you use, the addresses in URI/URL (Uniform Resource Identifier/Locator) notation of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to your operating system and the computer environment you use.

B. Cookies

The Site uses cookies, so for more information please see the cookie policy available on the Website.

C. Data provided using contact addresses

This is the information you choose to communicate by writing to the addresses listed on the Website. In this case we process the e-mail address and any other information you include in the communication.



D. Data provided for newsletter subscription

Upon request, Tondo will send you communications regarding major news about the world of Circular Economy. Communications may include invitations to events or news alerts from Tondo or third parties. In order to send the communications, the Owner will process the email address provided when subscribing to the service.

E. Data provided for participation in an event or event (e.g. MeetUp, Webinar, etc)

For participation in an event or event (e.g., ticket registration, registration), Tondo invites you to fill out a form for which you will be asked to provide certain data such as, but not limited to, first name, last name, email, nationality, LinkedIn profile, company at which you work.

As part of the same initiatives, video footage and/or photos of the audience may be taken. Images may be posted on Tondo's website and on our social channels. Through participation, you consent to the filming of the images and their exploitation for the purposes described.

In addition, the Holder, in the context of both online and offline events or events, may process for the purpose of dissemination on its channels, with prior consent, data relating to the individual participant or each team (depending on the organization of the event) e.g. names and surnames, team name, photos/videos of the project presented and materials produced by the team for the purpose of promoting the event.

Relative to online events, Tondo uses third-party systems to assess competencies within the selected online event. In this case, we will provide you with information about the selected platform from time to time so that you can view the relevant privacy policy.

The email address provided for participation in events or events will be used by Tondo to inform you about similar initiatives. Such processing does not require explicit consent (so-called "soft spam") and you may, at any time, request not to receive further communications by exercising your right to object under Article 21 GDPR by writing an email to info@tondo.tech and in any case when sending any communication by clicking on the appropriate link.

F. Data provided for Tondo's receipt of commercial communications

With your express consent, Tondo may use the contact information you provide to send you commercial communications about its own or third parties' activities or products.

G. Data provided for receipt of commercial communications from third parties

Subject to your express consent, Tondo may transmit to third parties the data you enter when filling out forms, forms (such as, for example, when purchasing a ticket or registering for an event) or when subscribing to the Platform in order to receive commercial communications.

Purpose and legal basis for processing

Processing activities are carried out in order to:

- Enable the operation of the Site. Browsing data are also processed in order to obtain statistical information on the use of the services (most visited pages, number of visitors by time slot or daily, geographical areas of origin, etc.) and/or to control the proper functioning of the services offered. The processing of such data is based on the legitimate interest of the owner
- Responding to your requests and communications. The processing is functional to fulfill a user request.



- Allow registration and registration for events and events. Processing is based on the execution of a contract or pre-contractual measures. Publication of names and surnames, team name, photos/videos of the presented project and materials produced by the team for the purpose of promotion of the event may be processed with prior consent. Dissemination of speakers' speeches will take place for promotional purposes with prior consent. The Holder may send communications related to similar initiatives. For such processing, which does not require explicit consent (so-called "soft spam"), at any time, you may exercise your right to object under Article 21 GDPR by clicking on the appropriate link you will find in each communication. Photos and videos of the public are collected and disseminated for promotional purposes only. The processing is based on the consent of the data subject.
- Allow us to send you commercial communications, including by automated means, about the activities of Tondo or third parties. In this case, your data may be used to include you among the recipients of the newsletter. Processing is based on the consent of the data subject.
- Communicate the data provided in event registration forms or when registering for the Platform to partners/sponsors of initiatives or third-party companies in order to receive commercial information. The processing is based on the consent of the data subject.

Method and place of processing

Your data will be processed at the Data Controller's offices within the European Union and/or at servers of third party companies duly appointed as data processors using methods and procedures strictly necessary for the pursuit of the purposes for which they were collected with the aid of electronic instruments.

Should it become necessary to transfer your data to countries outside the EU, the Data Controller assures you as of now that the transfer will take place in accordance with the applicable legal provisions, in the presence of adequacy decisions or subject to the stipulation of standard contractual clauses provided by the European Commission.

In order to avoid the risk of data loss, illicit use or incorrect use of data, or unauthorized access, alteration of data, appropriate technological and managerial security measures have been taken. Personal data will be processed by the Data Controller, by personnel authorized to process them or by individuals specifically appointed as Data Processors. At any time, you can ask the Data Controller for the full list of the Data Processors appointed from time to time involved in the processing of data for the purposes set out in this policy.

Communication and data diffusion

Browsing data may be disclosed to the judicial authorities if necessary for the investigation of crimes.

- For participation in events or events, in cases where such events are organized in collaboration with other entities, through your registration you are aware that your data will be shared with the Partner for activities strictly related to the conduct of the Project (e.g., disbursement of the prize; receipt of communications related to the organization and participation in the Event). As part of the events they physically hold, the Owner may disseminate photos and videos of the audience on its channels. For all events both online and offline, the Holder will disseminate, with prior consent, data related to the individual participant or each team (depending on the organization of the event) e.g. first and last names, team name, photos/videos of the presented project and materials produced by the team.



Data conservation

- Browsing data is retained for a maximum of 60 days.
- Data that you voluntarily disclose to send us emails will be kept only for as long as necessary to respond to your requests.
- Data related to newsletter subscription will be retained until your consent is revoked.
- Data related to registering for an event and requesting to attend an event or event will be retained for 10 years after the event ends. Data related to speaking as a speaker, of the project and related photos/videos will be retained until your request for deletion. Data related to communications about similar initiatives will be kept until your request to object.
- Data provided for commercial communications activities will be retained until your consent is revoked..

Rights of data subjects

As a data subject, you may exercise your rights under Articles 15 et seq. of the Regulation by sending an email to info@tondo.tech, or, by sending a registered letter with return receipt to Tondo, Corso Indipendenza 5, 20129 Milan (MI). You also have the right to lodge a complaint with the Privacy Guarantor, as a supervisory authority, should you believe that the processing of your personal data takes place in violation of the provisions of the current regulations.

Changes to the policy

This policy is valid from 22.01.2021 and is subject to updates; therefore, we invite you to periodically check its contents.