

PRIVACY NOTICE REGISTRATION TO EVENTS THROUGH MICROSOFT

Pursuant to the legislation currently in force on the protection of personal data (the “**Privacy Legislation**”) including the Regulation (EU) 2016/679 (the “**GDPR**”) the Italian Legislative Decree 196/2003 as amended by the Italian Legislative Decree 101/2018 (“**Privacy Code**”), PACE Aerospace Engineering and Information Technology GmbH (“**PACE**” or the “**Company**”, the “**Data Controller**”) in its capacity of data controller, informs Users (hereinafter the “**Users**” or, the singular, the “**User**”) of the website https://pace.txtgroup.com/student_contest_2024 (the “**Site**”) that it will process their personal data collected through the event registration form available on the Site itself (the “**Registration Form**”) in the manner and for the purposes described in this notice (the “**Notice**”).

This Privacy Notice applies solely and exclusively to the Website and not to other websites owned by third parties that the User may access through links contained in the Website. Should the User access another website, it is recommended that he/she read the information on the processing of personal data applicable to that site.

By filling in the Registration Form, the User acknowledges that he/she has read and understood the contents of this Notice.

1. **DATA CONTROLLER**

The Data Controller is PACE Aerospace Engineering and Information Technology GmbH, with registered office in Am Bahnhof Westend 13, 14059 Berlin (Germany), available at +49 30 29362-0 or at the following e-mail address privacy@txtgroup.com.

PACE is an affiliate of TXT Group (the “**TXT Group**”).

2. **TYPE OF DATA PROCESSED THROUGH THE SITE**

The Company will only process the following types of personal data of Users who fill in the Registration Form:

- (i) Personal data provided directly by the User when filling in the Registration Form available on the Site
These are the data provided to the Company directly by the User, through the relevant Registration Form available on the Site, (such as, by way of example but not limited to: name, surname, e-mail address, employer company, role, etc.) for the purpose of registering for the event from time to time organised by the Company.

3. PURPOSES AND LEGAL BASIS FOR PROCESSING

Personal data directly provided by the User will be processed for the following purposes (“**Purposes**”):

Purpose of processing	Legal basis for processing	Retention period
<p>a) allow the User to register for the event from time to time indicated by the Company, by completing the Registration Form available on the Site, and allowing the Company to organise and manage User participation.</p>	<p>Art. 6(1)(b) of the GDPR: execution of the contract to which the Data Subject is party and in the execution of pre-contractual measures taken at Data Subject's request.</p>	<p>Personal data for this Purpose will be stored and processed for the duration of the event and for a period of time equal to 12 months following the conclusion of the event.</p> <p>At the end of the retention periods, personal data will be deleted, unless there are further legitimate interests of the Company and/or legal obligations that render their retention necessary, after prior minimisation.</p>

Whenever the Company intends to use the collected personal data for any other purpose that is incompatible with the aforementioned Purpose for which it was originally collected or authorised, it shall inform the User in advance and, if necessary, collect consent for further processing of the data.

4. NATURE OF PERSONAL DATA TRANSMISSION

The provision of personal data by the User is optional, however the provision of personal data is necessary to allow the Data Controller to manage User registration and participation in the event, as well as to manage the organisational aspects of the event. Failure to provide personal data for this Purpose will result in the impossibility for the User to participate in the events organised by the Company.

5. DATA PROCESSING METHODS

Regarding the aforementioned Purposes, the processing of personal data may consist in the activities indicated in Article 4(1)(2) of the GDPR, namely: collection, recording, organisation, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, interconnection, deletion and destruction of personal data.

The processing may be carried out either by manual, computerised or telematic means with logic strictly related to the Purposes and, in any case, in such a way as to ensure the security and confidentiality of the

data themselves, in addition to compliance with the specific obligations enshrined in the Privacy Legislation from time to time in force and applicable.

6. DATA ACCESS AND COMMUNICATION

Users' personal data will be processed by the Company's staff, specifically designated as authorised persons for processing pursuant to Article 29 GDPR and 2-^{quater}decies of the Privacy Code.

Although without the express consent of the User, the Company may communicate the User's data for the Purposes referred to in Paragraph 3 above to supervisory and/or control bodies of the Company, judicial authorities as well as to all other entities to which the communication is mandatory by law for the fulfilment of the aforementioned Purposes, in their capacity as autonomous data controllers.

In addition, the Company may entrust certain personal data processing operations carried out for the Purposes referred to in Paragraph 3 above to categories of recipients, specifically selected and appointed by the Company, if necessary, as data processors pursuant to Article 28 GDPR, including, by way of example but not limited to:

- other entities of the TXT Group based in the European Union;
- technical service providers of the Site;
- hosting providers offering services for hosting the Site;
- agencies/companies involved in the organisation and management of events.

The complete and up-to-date list of data processors and persons in charge of processing is kept at the Company's registered office and may be requested in the manner set forth in the following Paragraph.

Users' data will not be disclosed to the public or to unspecified persons.

7. TRANSFER OF DATA OUTSIDE EU

Data management and storage will take place on the Company's servers located within the European Union and/or third party companies appointed and duly designated as data processors.

Any transfer of Users' data outside the European Union may only take place under the terms and with the guarantees provided for by the Privacy Policy and, in particular, pursuant to Articles 44 - 49 of the GDPR.

8. THIRD-PARTY WEBSITES

It should be noted as of now that, should the Website contain links to the websites of third parties, the Company cannot exercise any control over the content of such websites, nor does it have any access to the personal data of the users visiting such websites. Furthermore, the Company has no access to the personal data of the visitors/users of the websites or to the social network accounts of its Users with whom the Company has contractual relations, but only to aggregate and anonymous data that it may use to assess the performance and effectiveness of its services.

The owners of the aforementioned websites shall therefore remain the sole and exclusive owners and managers of the processing of their users' personal data, and the Company shall remain extraneous to such activity, as well as to any liability, prejudice or cost that may arise from its failure or improper performance.

It is therefore advisable to read the relevant privacy policies and terms of use of such websites carefully before providing or consenting to the processing of your personal data.

9. USER'S RIGHTS

The User, in its capacity as data subject, shall at all times have the right to withdraw any consent that may have been given, and may at any time exercise the following rights:

- a) the **"right of access"** and specifically to obtain confirmation of the existence or absence of personal data concerning him/her and to have them made available in an intelligible form;
- b) the **"right to rectification"** that is, the right to request the rectification or, if he/she has an interest, the integration of personal data;
- c) the **"right to erasure"** that is, the right to request the deletion, transformation into anonymous form of data processed in breach of the law, including data whose storage is not necessary in relation to the purposes for which the data were collected or subsequently processed;
- d) the **"right to restrict processing"** that is the right to obtain from the Data Controller the restriction of processing in certain cases provided for under the Privacy Legislation;
- e) the right to request the Data Controller to specify the recipients to whom he has notified any rectification or erasure or restriction of processing (carried out pursuant to Articles 16, 17 and 18 GDPR, in fulfilment of the obligation to notify except where this proves impossible or involves a disproportionate effort);
- f) the **"right to data portability"** that is the right to receive (or to transmit directly to another data controller) personal data in a structured, commonly used and machine-readable format;
- g) the **"right to object"** that is the right to object, wholly or partly:
 - to the processing of personal data carried out by the Data Controller for its own legitimate interest;
 - to the processing of personal data by the Data Controller for marketing or profiling purposes.

In the aforementioned cases, where necessary, the Data Controller shall inform the third parties to whom the Data Subject's personal data are transferred of the possible exercise of their rights, except in specific cases where this is not possible or would be too burdensome and, in any case, in accordance with the provisions of the Privacy Legislation.

It is expressly understood, as provided for under Article 21 of the GDPR, that in the event of exercise of the right to object by the Data Subject, the Data Controller shall refrain from further processing the personal data unless the Data Controller demonstrates the existence of compelling legitimate grounds for processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of a right in judicial proceedings.

However, the Company – where it has reasonable doubts as to the identity of the Data Subject making the request under Articles 15 to 21 of the GDPR – may request additional information necessary to confirm the identity of the Data Subject.

Please note that the Company undertakes to respond to your request at the latest within one month following receipt of your request. This deadline may be extended depending on the complexity or number of requests, and the Company will provide you with an explanation as to the reason for the extension within one month from your request. It should also be noted that should the Data Controller fail to comply with the request, it is obliged to provide feedback to the Data Subject as to the reasons for non-compliance and the possibility of lodging a complaint with a supervisory authority or judicial review within one month following receipt of the request.

10. PROCEEDING FOR EXERCISING RIGHTS AND COMPLAINTS TO DATA PROTECTION AUTHORITY

Users may at any time exercise their Rights in the following ways:

- by e-mail, to the address: privacy@txtgroup.com;
- by regular mail, to the address of the registered office of PACE Aerospace Engineering and Information Technology GmbH, in Am Bahnhof Westend 13, 14059 Berlin (Germany).

The Data Controller informs the User that, pursuant to the Privacy Legislation, he/she has the right to lodge a complaint to the competent supervisory authority (in particular in the Member State of his/her habitual residence, place of work or place of the alleged breach), if he/she considers that his/her personal data are being processed in a manner that would result in a breach of the GDPR.

In order to facilitate the exercise of the right to lodge a complaint, the name and contact details of the EU supervisory authorities are available at the following link: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

Finally, should the User wish to lodge a complaint to the competent control authority for the Italian territory (i.e. the Italian Data Protection Authority), the complaint form is available at the following link: <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>.

11. AMENDMENTS TO THE NOTICE

This Privacy Notice may be amended and supplemented over time. We invite Data Subjects to periodically check its contents. In any event, the Data Controller shall be responsible for duly notifying any significant changes made to this Privacy Notice.

Document updated as of 13/10/2023