CONSORZIO KADEO GROUP NOTICE ON THE PROCESSING OF PERSONAL DATA

pursuant to Article 13 of Regulation (EU) 2016/679 - GDPR

Data Controller	CONSORZIO KADEO GROUP
Registered office	Via Galileo Ferraris 63 - 52100 Arezzo (AR) - Italy
Tax Code / VAT No.	02530190517
REA No.	AR-226380
Certified email (PEC)	kadeogroup@pec.it
Version	26 September 2026

This notice describes how CONSORZIO KADEO GROUP processes personal data provided by the data subject through the application form for membership of the Consortium and, subsequently, in the context of any resulting Consortium membership relationship.

1. Data Controller

The Data Controller is CONSORZIO KADEO GROUP, with its registered office at Via Galileo Ferraris 63, 52100 Arezzo (AR), Italy, Tax Code/VAT No. 02530190517, REA No. AR-226380, certified email (PEC): kadeogroup@pec.it. Requests concerning personal data protection may be sent using the contact details above.

2. Personal data processed

The following data may be collected and processed as part of the membership application: first and last name; date of birth; address; city; postcode; province, region or state; country; telephone; email; tax identification number; VAT number; business name of any company represented; capacity or role of the signatory; username and data required to create the account; selected membership package; declarations and acceptances submitted through the form; date and time of the application; information on the outcome of the application and, if admitted, administrative and accounting data relating to Consortium membership.

3. Purposes of processing

Personal data are processed to:

- a) receive and manage applications for membership of CONSORZIO KADEO GROUP;
- b) verify the applicant's eligibility and submit the application to the competent bodies of the Consortium;
- c) identify the applicant and, for companies or other legal entities, their representative;
- d) manage communications relating to the application;
- e) if approved, establish and manage the Consortium membership relationship;

- f) manage Consortium membership fees, participation packages, payments and administrative and accounting documentation;
- g) enable access to the Members' Area of the website;
- h) comply with obligations under the law, tax and accounting legislation, the Articles of Association, the Consortium Regulations and applicable provisions;
- i) establish, exercise or defend any rights of the Consortium in judicial or out-of-court proceedings.

4. Legal basis for processing

Depending on the purpose concerned, processing is based on taking pre-contractual steps at the data subject's request and on any subsequent Consortium membership relationship; compliance with legal obligations to which the Data Controller is subject; the Consortium's legitimate interest in the proper management, organisation, security and protection of its relationships; and the data subject's consent solely where such consent is specifically required by law.

5. Provision of personal data

Providing the data marked as mandatory in the form is necessary to assess and manage the membership application. Failure to provide these data will prevent the Consortium from properly examining the application. Submitting an application does not automatically result in admission to the Consortium. Admission will take place only following the approval procedure established by the Consortium.

6. Processing methods and security

Personal data will be processed using IT and electronic systems and, where necessary, paper records, in accordance with the principles of lawfulness, fairness, transparency, data minimisation and security. The Data Controller implements appropriate technical and organisational measures to protect data against loss, unauthorised access, disclosure, alteration or destruction.

7. Recipients of personal data

To the extent strictly necessary, data may be processed by authorised members and staff of CONSORZIO KADEO GROUP; members of the Consortium bodies responsible for assessing the application; appointed administrative, tax and legal advisers and other professionals; providers of IT services, hosting, website maintenance and systems management; banks and parties involved in payment management; and public bodies, authorities, public administrations and agencies where required by law. External parties processing data on behalf of the Consortium will, where necessary, be appointed as data processors pursuant to Article 28 GDPR.

8. Public disclosure of personal data

Personal data will not be disclosed to the public, except for information whose publication is required by law or expressly requested or authorised by the data subject where permitted.

9. Transfers outside the European Economic Area

Where the use of certain technology providers by the Consortium entails transferring personal data to countries outside the European Economic Area, such transfers will comply with the conditions laid down in the GDPR, through adequacy decisions, standard contractual clauses or another mechanism provided for by applicable law.

10. Retention period

Data relating to membership applications will be retained for as long as necessary to assess the application and manage any subsequent obligations or disputes. If the applicant is admitted, data will be retained throughout the Consortium membership relationship and thereafter for the periods required by applicable civil, tax, administrative and accounting legislation. Data that are no longer necessary will be erased or anonymised, unless further retention is required by law.

11. Rights of the data subject

Where provided for by law, data subjects may exercise the rights recognised under Articles 15-22 GDPR, including obtaining confirmation that their personal data are being processed and accessing those data; requesting rectification of inaccurate data; requesting erasure where the relevant conditions are met; obtaining restriction of processing; objecting to processing in the cases provided for; requesting data portability where applicable; and withdrawing any previously given consent, without affecting the lawfulness of processing carried out before withdrawal.

12. Complaint to the supervisory authority

If data subjects consider that their personal data are being processed in breach of applicable law, they may lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), without prejudice to their right to seek a remedy before the competent courts.

13. Automated decision-making

Submitting an application online does not automatically result in admission to the Consortium. The application is subject to the assessment and approval procedure established by CONSORZIO KADEO GROUP.

14. Updates to this notice

CONSORZIO KADEO GROUP may update this notice following legislative, organisational or technical changes. The updated version will be made available on the Consortium's website.

DECLARATION TO INCLUDE IN THE MEMBERSHIP APPLICATION FORM

☐ I declare that I have read and understood the Notice on the Processing of Personal Data pursuant to Article 13 of Regulation (EU) 2016/679.

Note: for optional processing separate from membership management (e.g. newsletters or marketing), separate consent options that are not pre-selected should be provided, where such processing is used.

Important: this template was prepared for the Consortium's membership application process on the basis of the information available. Before final publication, it should be checked with the Consortium's privacy adviser/DPO, particularly regarding the providers actually used, retention periods and any transfers outside the EEA.