

PRIVACY NOTICE FOR WEBSITE USERS

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

DATA CONTROLLER

Fondazione LINKS – Leading Innovation & Knowledge for Society

VAT no. 11904960017

Registered office: via Pier Carlo Boggio 61, 10138 Turin, Italy

E-mail: info@linksfoundation.com

Pursuant to Article 13 GDPR, Fondazione LINKS – Leading Innovation & Knowledge for Society (the "Data Controller" or "Fondazione LINKS") informs users of the website dedicated to the DEEPACT programme (the "Website") that their personal data will be processed for the purposes and by the methods described below.

1. Categories of data collected

The Data Controller processes identification data, contact data and usage data collected during the User's navigation of the Website or provided through its forms and functions (the "Personal Data" or "Data").

In particular, the following Data may be processed:

- navigation and technical data, including IP address, date and time of the request, requested resource, response code, browser, operating system, device information and logs;
- identification, contact and professional data provided through contact, registration or account forms, such as name, surname, e-mail address, telephone number, company and role;
- account and authentication data, including credentials, identifiers and access logs;
- data entered in the DEEPACT application and its attachments. Such data are governed in greater detail by the specific DEEPACT Application Privacy Notice;
- cookies and other online identifiers, as described in the Cookie Policy and according to the preferences expressed by the User.

2. Purposes and legal basis of processing

The User's Personal Data will be processed for the following purposes:

- a) enable navigation and the proper functioning of the Website;
- b) respond to requests for information submitted by the User;
- c) create and manage the User's account and reserved area and enable submission and management of a DEEPACT application;
- d) acquire aggregate statistics and technical metrics and monitor the proper functioning and security of the Website;
- e) comply with legal obligations and establish, exercise or defend legal claims;
- f) use non-essential cookies or similar technologies for the purposes described in the Cookie Policy, in accordance with the preferences expressed by the User.

The legal bases for processing are:

- g) for purpose a), processing is based on the legitimate interest of the Data Controller in ensuring the availability, proper operation and security of the Website (Article 6(1)(f) GDPR);

FONDAZIONE LINKS Leading Innovation & Knowledge for Society

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FONDAZIONE ISCRITTA NEL REGISTRO DELLE PERSONE GIURIDICHE PRESSO LA PREFETTURA DI TORINO AL N. 365

linksfoundation.com

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- h) for purpose b), processing is necessary to take steps at the User's request prior to entering into a contract, where relevant (Article 6(1)(b) GDPR), or is based on the legitimate interest of the Data Controller in responding to other requests (Article 6(1)(f) GDPR);
- i) for purpose c), processing is necessary to take steps at the User's request prior to entering into a contract and is based on the legitimate interest of Fondazione LINKS in managing relations with DEEPACT applicants and their representatives (Article 6(1)(b) and (f) GDPR);
- j) for purpose d), processing is based on the legitimate interest of the Data Controller in measuring Website use and ensuring its proper and secure operation (Article 6(1)(f) GDPR). Where non-essential cookies or similar technologies are used, purpose f) applies;
- k) for purpose e), processing is necessary to comply with legal obligations (Article 6(1)(c) GDPR) and, for legal claims, is based on the legitimate interest of the Data Controller in protecting its rights (Article 6(1)(f) GDPR);
- l) for purpose f), processing is based on the User's consent, which may be refused or withdrawn at any time through the cookie-preference tool (Article 6(1)(a) GDPR and applicable e-privacy rules).

Users are free not to provide Data requested through optional fields. Failure to provide mandatory Data may make it impossible to respond to a request, create an account or submit and manage an application.

The User's Data may also be processed through cookies. Further information is available in the Cookie Policy published on the Website.

3. Retention time

Personal Data will be retained for the time necessary to fulfil the purposes described in this Privacy Notice.

Copies of correspondence having legal or commercial relevance may be retained for 10 (ten) years. Other messages will ordinarily be retained for 2 (two) years, unless a longer period is necessary to manage the relationship or protect a right.

Account and application data will be retained according to the criteria specified in the DEEPACT Application Privacy Notice. Navigation and security logs will be retained for the period necessary to ensure the operation and security of the Website or investigate misuse. Data may also be retained for the time necessary to establish, exercise or defend legal claims.

Personal Data processed through cookies will be deleted according to the periods and methods stated in the Cookie Policy.

4. Disclosure of personal data

The User's Personal Data will not be disseminated. Where necessary for providing the Website and its services or complying with statutory obligations, Data may be made accessible or disclosed to:

- employees and collaborators of the Data Controller, acting as persons authorised to process Personal Data and/or system administrators;
- third-party companies or professionals providing outsourced services, including hosting, platform management, IT support, maintenance, cybersecurity and application-support services, acting as Data Processors or, where applicable, independent Data Controllers;
- supervisory, judicial or public authorities and other recipients to whom disclosure is required by law or necessary for the purposes described above.



5. Transfer of personal data

The User's Data are normally stored on servers located within the European Economic Area and managed by providers duly appointed as Data Processors.

Where a specific service entails a transfer outside the European Economic Area, the transfer will take place only to countries covered by an adequacy decision of the European Commission or on the basis of appropriate safeguards under Articles 46 et seq. GDPR, such as the European Commission's Standard Contractual Clauses. Further information or a copy of the applicable safeguards may be requested from the Data Controller or the DPO.

6. Users' rights

In relation to the processing of Personal Data, the User may exercise the following rights:

- obtain confirmation as to whether the Data Controller is processing Personal Data and access such Data;
- request the updating, rectification or completion of Personal Data;
- request erasure of Personal Data or restriction of processing where the statutory conditions are met;
- object, on grounds relating to the User's particular situation, to processing based on the Data Controller's legitimate interests;
- withdraw consent at any time, without affecting the lawfulness of processing carried out before withdrawal;
- receive Personal Data in a structured, commonly used and machine-readable format and transmit them to another Data Controller where the conditions for data portability are met;
- lodge a complaint with the competent Supervisory Authority, including the Italian Data Protection Authority (Garante per la protezione dei dati personali).

7. Data Controller contact information

To exercise the rights granted by the GDPR, the User may contact the Data Controller at info@linksfoundation.com, providing the information necessary to identify the requester and the subject matter of the request. A copy of an identity document will be requested only where reasonably necessary to verify identity.

8. Data Protection Officer

The Data Controller has appointed a Data Protection Officer who may be contacted at privacylinks@argobs.it.

9. Information not contained in this notice

Further details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time using the contact information provided above. The processing of Data contained in DEEPACT applications is also described in the specific DEEPACT Application Privacy Notice.

10. Changes to this Privacy Notice

The Data Controller reserves the right to amend this Privacy Notice at any time. The updated version will be published on the Website and the date of the latest update will be indicated below.

Privacy Notice updated on: 6 August 2026