

Privacy Notice on the Processing of Personal Data of Customers and Course Participants

Privacy Notice on the Processing of Personal Data of Customers and Course Participants pursuant to Regulation (EU) 2016/679 of 27 April 2016 on the Protection of Natural Persons with regard to the Processing of Personal Data (GDPR) and Italian Legislative Decree No. 196/2003 (Italian Privacy Code)

Introduction

CEIDA Centro Italiano di Direzione Aziendale S.r.l. is committed to respecting and protecting the privacy of its customers and course participants in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Italian Personal Data Protection Code (Legislative Decree No. 196/2003, as amended).

This Privacy Notice explains how the Company collects, uses, and processes personal data in connection with the following activities:

- **Management of the contractual relationship relating to the provision of training services:** CEIDA S.r.l. processes personal data to organize, manage, and deliver training and professional development courses to its customers. This includes collecting the information necessary for course registration and enrollment, such as first name, last name, email address, telephone number, job position, and employer.
- **Marketing activities directed at customers and course participants:** CEIDA processes customers' personal data to send promotional communications, including newsletters, special offers, and information about new products, services, and training opportunities. This includes processing contact details such as first name, last name, email address, telephone number, and information relating to previous interactions between the customer and the Company.

In both cases, this Privacy Notice provides information on the categories of personal data processed, the purposes and legal bases of the processing, the rights of data subjects under the GDPR, and the contact details for obtaining further information or exercising those rights.

Data Controller

	The Data Controller is: CEIDA Centro Italiano di Direzione Aziendale S.r.l. Via Palestro, 24 00185 Rome (Italy) Email: privacy@ceida.com
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Categories of Personal Data Processed

	The personal data processed may include:
	• Personal identification data, including first name, last name, place and date of birth, tax identification number and/or VAT number, residential address, email address (including certified email where applicable), and telephone contact details;

	Banking and financial information, including bank account details and/or IBAN, where necessary for processing payments relating to the services provided;
	Information required to organize training sessions, manage course registrations, and send communications concerning schedules, venues, educational materials, and administrative matters;
	For online training courses, technical data such as IP addresses, browser information, device identifiers, and other technical information necessary to ensure secure access to e-learning platforms;
	Information relating to the delivery of training services, including attendance records, participation monitoring, assessment results, practical exercises, questionnaires, and feedback provided by participants;
	Photographs, video recordings, and audio recordings where collected in connection with training activities;
	Any declarations, comments, evaluations, or feedback voluntarily provided by the data subject.

Purposes of Processing, Legal Bases, and Retention Periods

Purpose of Processing	Legal Basis	Retention Period
Purposes related to the performance of the contractual relationship, including, in particular, the organization, administration, and delivery of training courses. This includes all communications and contacts necessary for the management and performance of contractual obligations, as well as the management of related administrative and accounting activities.	Article 6(1)(b) GDPR – Performance of a contract.	For the entire duration of the contractual relationship and thereafter for the period required by applicable laws and statutory limitation periods.
Purposes related to market research and surveys, including statistical analyses carried out on aggregated and anonymized data for management control purposes and for the improvement, development, or modification of existing	Article 6(1)(f) GDPR – Legitimate interest.	For the duration of the contractual relationship and thereafter for the maximum period permitted under applicable laws.

services.		
Purposes related to the monitoring and prevention of fraudulent activities and the management of the risk of non-payment.	Article 6(1)(f) GDPR – Legitimate interest.	For the duration of the contractual relationship and thereafter for the maximum period permitted under applicable laws.
Purposes related to the establishment, exercise, or defence of legal claims.	Article 6(1)(f) GDPR – Legitimate interest.	For the duration of the contractual relationship and thereafter for the maximum period permitted under applicable laws.
Compliance with legal obligations arising from applicable laws, regulations, and European Union legislation, as well as from orders issued by competent public authorities or supervisory bodies.	Article 6(1)(c) GDPR – Compliance with a legal obligation.	Personal data shall be retained only for the period necessary to comply with the applicable legal obligations.
Marketing activities directed at existing customers for the purpose of promoting services similar to those already purchased or services that may reasonably be of interest to the data subject (soft spam).	Article 6(1)(f) GDPR – Legitimate interest.	For the duration of the contractual relationship and, following its termination and upon expiry of the statutory retention periods required by applicable laws and regulations, for an additional five (5) years, unless the data subject objects to such processing.

Once the above-mentioned retention periods have expired, personal data shall be deleted, destroyed, or anonymized, in accordance with the applicable technical procedures for deletion and backup management, and in compliance with the GDPR and applicable data protection laws.

Methods of Processing Personal Data

Personal data shall be processed in accordance with the principle of data minimization, pursuant to Article 5(1)(c) and Article 25 of Regulation (EU) 2016/679. This means that personal data shall be processed lawfully, fairly, and transparently, collected for specified, explicit, and legitimate purposes, kept accurate and updated where necessary, and limited to what is adequate, relevant, and necessary in relation to the purposes for which they are processed. The processing of personal data shall be carried out in a manner that minimizes the risks of destruction, loss, unauthorized access, or

unlawful processing, and ensures that data are not used for purposes incompatible with those for which they were originally collected.

Mandatory Nature of Data Provision

The provision of personal data is mandatory for the purposes described above and for the establishment, management, and performance of the contractual relationship. Failure to provide, partially provide, or provide inaccurate personal data may result in the impossibility of establishing the relationship and fulfilling any related contractual or legal obligations.

Possible Recipients of Personal Data

Your personal data may be disclosed to the following categories of recipients acting as independent Data Controllers: public entities, authorities, and supervisory and control bodies that have access to such data due to legal or administrative obligations; banks and companies managing national or international payment systems; public and private entities, natural persons, or legal entities (universities, certification bodies, judicial offices, mediation bodies, chambers of commerce, etc.) where necessary to fulfill contractual or legal obligations. Your personal data may also be disclosed to private entities acting as Data Processors, operating on behalf of the Company in order to provide services necessary for the performance or management of the contractual relationship. These may include providers of video conferencing software, such as Zoom Video Communications Inc. and Microsoft Corporation (Teams). Zoom Video Communications, Inc. is a US technology company specialized in video conferencing and online communication services. Further information on Zoom's privacy policy is available at: <https://explore.zoom.us/en/privacy/> The relationship with Zoom as Data Processor is governed by the following agreement: https://explore.zoom.us/docs/doc/Zoom_GLOBAL_DPA.pdf Microsoft Teams is a communication and collaboration platform developed by Microsoft and included in the Microsoft 365 productivity suite. Teams integrates chat, video conferencing, file storage, and other applications. Further information on Teams' privacy policy is available at: <https://privacy.microsoft.com/en-gb/privacystatement> The relationship with Microsoft as Data Processor is governed by the following agreement: <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA> Furthermore, in order to pursue the purposes described above, your personal data may be accessed by third parties acting on behalf of the Company, such as companies, consultants, or professionals appointed to manage information systems, workplace safety, legal, accounting, tax, or other professional services related to the Company's activities. These entities shall process personal data as external Data Processors on behalf of the Company.

Authorized Persons

Your personal data may be processed by employees or collaborators belonging to the Company's departments and functions responsible for pursuing the purposes described above. These individuals have been expressly authorized to process personal data, have received appropriate training, and have been provided with specific operational instructions for carrying out their assigned tasks.

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Transfer of Personal Data Outside the European Union

	Some of the personal data collected may be transferred to countries outside the European Union (in particular, through video conferencing software provided by Zoom Video Communications Inc. and Microsoft Corporation). Such transfers are carried out on the basis of specific adequacy decisions adopted by the European Union and the Italian Data Protection Authority, in particular pursuant to the European Commission Adequacy Decision C(2023) 4745 concerning the EU-US Data Privacy Framework (EU-US DPF) . The companies involved guarantee their adherence to this framework.
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Data Subject Rights

	The data subject has the following rights:
	To obtain confirmation as to whether or not personal data concerning you are being processed and to access such data, receiving information on the purposes of processing, categories of personal data, recipients, retention period, the existence of automated decision-making processes, and transfers outside the EU/EEA, as well as a copy of the personal data (right of access);
	To request the rectification or completion of inaccurate or incomplete personal data (right to rectification);
	To request the erasure of your personal data where they are no longer necessary, have been unlawfully processed, or must be deleted pursuant to a legal obligation, unless processing is necessary for reasons of public interest or for the establishment, exercise, or defence of legal claims (right to erasure/right to be forgotten);
	To obtain restriction of processing, meaning that personal data shall be retained but not further used (right to restriction of processing);
	To receive your personal data provided to the Company in a structured, commonly used, and machine-readable format and to transmit such data to another Data Controller, where technically feasible and where processing is based on consent or on a contract (right to data portability);
	To withdraw consent to the processing of personal data, where consent has been provided (right to withdraw consent).
	To object to the processing of your personal data where such processing is based on the legitimate interest of the Data Controller (right to object).

To exercise your rights regarding the processing of personal data, you may contact the Data Controller, **CEIDA Centro Italiano di Direzione Aziendale S.r.l.**, using the following contact details:

Email: privacy@ceida.com

Telephone number: +39 06 492531

Address: Via Palestro, 24 – 00185 Rome, Italy

Data Subject Rights

Data subjects have the right to lodge a complaint with the competent supervisory authority if they believe that the processing of their personal data has been carried out unlawfully. In Italy, the competent supervisory authority is the Italian Data Protection Authority (Garante per la protezione dei dati personali) . Further information and the complaint form are available on the Authority's website: www.garanteprivacy.it

Amendments to this Privacy Notice

The Data Controller reserves the right to amend or update this Privacy Notice at any time.
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Cookie Policy updated on 20 July 2026.