

PRIVACY POLICY

ON THE PROCESSING OF PERSONAL DATA OF USERS OF THE WHER APPLICATION

Pursuant to Article 13 of EU Regulation 2016/679 of 27/04/2016 (General Regulation for the Protection of Personal Data, here below referred to as GDPR for brevity), we communicate to you below the due information regarding the processing of personal data provided by you through the use of the Wher application and related services.

This policy explains what personal data we collect, for what purposes, how we process it and what your rights are.

We are aware that providing your personal data involves a high level of trust on your part and that the confidentiality and protection of personal data are fundamental rights of the individual. Therefore, it is our primary objective to process your personal data in compliance with the rules provided for by national and European legislation, collecting data accurately, relevantly and adequately and storing it in a secure way.

1. Data controller

The Data Controller, pursuant to art. 4 and 24 of the GDPR, is the UK registered charity **Walk21 Foundation** (Registration number 1174564), in person of this legal representative *pro tempore*, with registered office in Cheltenham, Gloucestershire, UK (hereafter **the Data Controller**). The Data Controller can also be contacted by e-mail at the following address network@walk21.com.

2. Purpose of the processing

The processing is aimed at the correct and complete execution of the services provided by the Wher application (the app). More precisely, the personal data provided by you will be processed for the following purposes:

- a) allow you to register and manage your Wher account, including access to and use of your app (including, for example, posting ratings, comments, and other content in the community), according to the app's terms and conditions of use;
- b) communicate with you, for example to send you information about Wher, newsletters and invitations to community events, measure your interest in order to improve the app and service, request your opinions and opinions, for example through surveys;
- c) comply with legal obligations and resolve any disputes or problems.

3. What data do we process

The Data Controller collects the personal data that the user (the Data Subject) provides when registering with the app (through a Facebook or Google account) and when using the app. To register and access the services offered by the app, you must be at least 14 years of age.

The personal data processed for the purposes indicated in point (a) above consist specifically of: identification of the social account (Facebook or Google) used for registration; first and last name used on your Facebook or Google account; gender; age group or (if specified) date of birth; the city; link to the profile photo of the Facebook or Google account used (you can choose to hide the profile photo from other users of the app); e-mail address (if provided); mobility habits (i.e. the preferred type of means of transport, chosen from the following: walking, bicycle, public transport, car); the IP address used to connect to the app; the electronic device used and the version of the respective operating system; the app's access/usage history. Of the aforementioned data those processed also for the specific purposes referred to in point b) are: first and last name used on the Facebook or Google account; the city; e-mail address. For the purposes indicated in point (c) first and last name used on the Facebook or Google account; IP address; e-mail address.

4. Legal basis for processing and mandatory or optional nature of the data provided

All data requested for the purposes referred to in **(a)** and **(c)** except the email address and mobility habits, are mandatory for the execution of the services provided by the app (art. 6lett .b, GDPR) and the fulfillment of legal obligations (art. 6lett .c, GDPR). Therefore, your refusal to provide such data will make it impossible for the Data Controller to establish and manage the relationship itself and to provide the requested services. By accessing the app and related services, you consent to the processing of such data.

With reference to the purposes referred to in point **(b)**, consent is optional and your specific and explicit consent represents the legal basis for the processing. In case of non-consent to the aforementioned processing, it will not be possible to carry out the activities provided for therein.

5. How data is treated and updated

The processing of personal data will be carried out by the Data Controller exclusively for the purposes indicated above, both on paper and computer and electronic media (including portable devices), in compliance with current legislation on confidentiality, security and in accordance with the principles of correctness, lawfulness, transparency and protection of your rights. The treatment is carried out directly by the owner's organisation and/or by its own Internal Representatives or External Managers, for this purpose specially appointed and instructed. It is important that the data held by the Data Controller are correct, accurate and up-to-date, therefore, if the data provided by you, including through social accounts, are not correct or subsequently undergo changes, it is necessary that you promptly communicate corrections or changes to us through the Wher application or by writing to the email address network@walk21.com. **Your personal data will not be communicated, transferred or disseminated to third parties in any way.** The data provided may be communicated exclusively to the Data Controller's collaborators (Internal Agents or External Managers), who in any case must be able to provide all the guarantees in order to ensure full compliance with the provisions regarding the processing of personal data as well as to guarantee the protection of your rights and must act under the authority and instructions of the Data Controller exclusively for the purposes described above. The complete and up-to-date list of internal and external managers can be consulted by request to be forwarded to the address E-mail: network@walk21.com. Personal data in electronic format will be stored on servers located within the UK or European Union and will not be transferred to non-EU countries. If it is necessary, in order to comply with the purposes related to the processing, provide for a transfer of data outside the European Union, this will be done in compliance with the limits and conditions established by art. 44 and ss. of the GDPR.

6. How long do we store your data

In compliance with the provisions of art. 5 paragraph 1(b) of the Treaty (c) of the GDPR personal data will be stored, in a form that allows the identification of the user (Interested),f or a period of time not exceeding the achievement of the purposes for which they are processed. And more precisely, the data collected for the purposes indicated in points **a)** and **b)** of art.3 of this information will be kept for the duration of registration to the service. The data relating to the purposes referred to in point **(c)** may be kept for a longer period, determined on the basis of current legislation and specifically for a maximum period of ten years.

7. What are your rights

In your capacity as interested party, you can assert at any time the following rights provided for in art. 15 and ss. of the GDPR:

- request access to personal data or confirmation or not of the processing of personal data and indications about the categories of personal data processed, the purposes of the processing, any recipients or categories of recipients to whom personal data are communicated and, where possible, the period of storage of the same (right of access);
- have inaccurate data rectified or incomplete data supplemented (right of correction)
- have personal data deleted when one of the conditions set out in Article 17(1) of the GDPR is met and in compliance with the exceptions provided for in paragraph 3 of that article (right to deletion);
- obtain the limitation of the treatment, in the cases provided for in art. 18 of the GDPR (right of limitation of processing);
- obtain the portability of the data, i.e. receive it from the Data Controller, in a structured format, common use and readable by automatic device, and transmit them to another Data Controller without hindrance (right to portability of personal data);
- object to processing, including automated decision-making processes, where it is not possible to obtain data deletion as this is justified for legitimate reasons (right of objection);
- revoke consent, limited to cases where the processing is based on your consent, without prejudice to the lawfulness of the processing based on consent given before withdrawal (right to withdraw consent);
- lodge a complaint with a supervisory authority (Guarantor Authority for the Protection of Personal Data) (right of complaint).

For the exercise of these rights, or for questions, clarifications and information regarding the processing of your data and the security measures taken, you can forward your request to the following address:

Walk21 Foundation

Via Jim Walker

(Charity registration number 117 4564), 24 Moorend Road, Cheltenham, Gloucestershire, GL53 0HD. United Kingdom.

Email: network@walk21.com

8. Changes to this policy

This policy may change over time. We therefore advise you to always refer to the most up-to-date version, which can be consulted on the website www.w-her.com.

Information updated at 19.04.2021