

# **NDCF Privacy Policies**

## **Data Protection Policy on NDCF's Website**

The NATO Defense College Foundation ("we") are committed to protecting your privacy and being transparent about what information we may hold about you.

### **1. Overview**

In general, our website may be used anonymously. Providing personal data is purely voluntary and you will always be informed if and for what purpose we want to store your data. Personal data is data that enable us to identify you personally and/or to contact you, such as your name, address or e-mail address.

### **2. In Detail**

#### **2.1 About us**

The controller of the processing of personal data on this website is:

NATO Defense College Foundation (NDCF)

Via Alessandro Serpieri, 8

00197, Rome – Italy

Mobile: (+39) 342 847 7698

E-Mail: [info@natofoundation.org](mailto:info@natofoundation.org)

Web: [www.natofoundation.org](http://www.natofoundation.org)

#### **2.2 What data we do (not) process, for what purpose, for how long and on what legal basis**

In general: If we intend to store data about you, we will always point this out to you and they will not be used for any purpose other than those expressly stated in this privacy policy. All data stored on our servers are reset every 365 days.

#### **2.3 Anonymous use of our website**

You may use our website anonymously. When you visit our website, your web browser tells our web server your IP address so that communication is possible. Your IP address may be used to identify you. However, we do not store your IP address. You remain completely anonymous to us when visiting our website.

#### **2.4 Logging and evaluation in case of attacks**

Error messages – usually caused by attack attempts – are recorded and evaluated for reasons of security. Only the following data that may allow identification are used with respect to the recording of error messages:

- Your IP address,

- date and time,
- exact name (URL) of the requested data file(s),
- HTTP status code,
- volume of data transferred,
- referrer (website from which the file was requested),
- browser identification string that is sent from your browser (User Agent String).

Such data shall be deleted after seven days if they are no longer useful (possibly for evidence).

The legal basis for data processing is Art. 6 para. 1 subpara. 1 letter f GDPR. The legitimate interests in processing on the basis of Art. 6 para. 1 para. 1 letter f GDPR are ensuring of the functionality and security of our website as well as defence against attacks and other abuses.

## **2.5 Data processing upon contact**

If you call us or send us a message and if you want us to reply to you, for our answer, we need your e-mail address, your postal address or a telephone number. You may also use a pseudonym instead of your name. We will use this data as well as data and time of your contact exclusively to handle your request. Your data will not be passed on to third parties but only internally to the department responsible for your particular request. The legal basis for the data processing is Art. 6 para. 1 subpara. 1 letters b and f GDPR. The legitimate interest in processing on the basis of Art. 6 para. 1 subpara. 1 letter f GDPR is to fulfil your request.

If your request is for a special purpose (e.g. event registration), only the explanations in the respective section for that special purpose apply to data processing in this context, about which we will inform you separately if necessary.

## **2.6 Data processing in connection with third-party content providers such as Facebook and Twitter**

Third-party content is incorporated into the NDCF website. These are:

- the communication platform Facebook,
- the short news service Twitter

Normally, your web browser would automatically exchange information with these providers, e.g. your IP address. We no longer have any influence on the processing of your data by third-party providers - just as if you follow another link to another website.

Please note that the privacy protection law may be less stringent in the country where the third party is located than in our country. You can find out more about the data protection regulations of the third party providers here:

- Facebook: <https://www.facebook.com/policy.php>
- Twitter: <https://twitter.com/privacy>

When you activate the third party content, your web browser establishes a direct connection to the respective third-party provider, so that the third party provider – technically unavoidable– learns your IP address and other data about your browser, which it automatically sends along.

## **2.7 Voluntary provision of your data**

You are not obliged to provide us with personal data. If you do not provide us with certain information that we need to handle your request, we may not be able to do so. In the context of special procedures, it may be necessary for you to provide us with certain information because otherwise, we will not be able to process your registration. However, we will always point this out to you in the specific situation.

## **2.8 Recipients of your data**

Your personal data will remain with us, except in special exceptional cases, in which we will expressly inform you to whom your data will be sent.

In certain areas, such as event management and email hosting, we use specialised service providers. These are:

- The events planning platform Eventboost,
- The mail distributor MailChimp,

These providers are strictly bound by their privacy policies and may not process the data for their own purposes. Their data protection regulations are here:

- Eventboost: <http://www.eventboost.com/privacy/>
- MailChimp: <https://mailchimp.com/legal/privacy/>

## **2.9 Automated decision making and profiling**

Your data will not be used for automated decision making or profiling.

## **2.10 Your rights**

You have the right to receive free information about your data; the right to have such data corrected or deleted or to have their processing restricted; the right to object to the processing of your data; and the right to data transferability under the respective statutory preconditions with regard to the personal data concerning you. In particular, you have the right to object to the processing of your data for advertising purposes at any time without incurring costs other than the transmission costs, according to the rates of your provider (e.g. the costs of an email = usually none). If the data processing is based on consent, you have the right to withdraw your consent at any time without affecting the lawfulness of the processing being carried out on the basis of consent until the withdrawal or of the processing on another legal basis. If you want to exercise these rights, you can simply write to [info@natofoundation.org](mailto:info@natofoundation.org).

You also have the right to complain to a data protection supervisory authority about our processing of your personal data, for example to the supervisory authority responsible for us:

The Italian Data Protection Authority (Garante per la protezione dei dati personali)  
Piazza di Monte Citorio, 121  
00186 Roma  
Phone: +39 06 6967 71

## **2.11 Your right to object to data processing**

The processing of your personal data is based on Art. 6 para. 1 subparas. 1 (e) and (f) GDPR. You have the right to object to processing in accordance with Art. 21 GDPR. If your objection is made for reasons arising from your particular situation, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms of or for the establishment, exercise or defence against legal claims.

## **Data Protection Policy for NDCF's Events**

When you register for an event, we require certain data from you, depending on the type of event. The invitation or registration form indicates which information is required and which is voluntary. Your data will not be passed on to third parties. Any exceptions (e.g. at cooperation events) will be clearly communicated during registration.

We use your data for the following purposes:

- for the organisation and execution of the event,
- to network the participants of the event by issuing name tags and displaying lists of participants if necessary: on your name tag we only list your name; your surname, your function and your institution will appear on the list of participants unless you object to this,
- to plan future events and research activities and, if suitable, to invite you to attend them,
- to check whether you should be included in the general address database of the NDCF because you are important for our research or as a recipient of our research results,
- to prove that we may process your data, in particular, send you information by e-mail,
- to fulfil our statutory, fiscal and budgetary obligations and interests including controlling, the fight against fraud and corruption and the documentation of our activities; in particular, if you are fed during the event or receive refunds, we must store your registration and, if applicable, invoice and payment data,
- only if expressly pointed out, also for the documentation of the event by photo and film recordings, which can also be used for public relations work of the NDCF.
- Due to the security situation of the NDCF, you must present a valid photo ID for admission to the events. It is used for comparison with the participant list. We do not collect any data from your identity card.

Your data will not be used by us for automated decision making or for profiling within the meaning of Art. 22 GDPR.

For more information about the GDPR, our obligations and your rights, please visit the EU Commission website at [https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules\\_en](https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules_en).