PRIVACY STATEMENT – Subscription to Operation EUNAVFOR MED IRINI Newsletter

1. INTRODUCTION

The protection of your personal data and privacy is of great importance to Operation EUNAVFOR MED IRINI. You have the right under EU law to be informed when your personal data is processed [collected, used, stored] as well as about the purpose and details of that processing. When handling personal data, we respect the principles of the Charter of Fundamental Rights of the European Union, and in particular Article 8 on data protection. The Operation is aligned with provisions of the General Data Protection Regulation and of Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data. In this privacy statement, you find information about how Operation EUNAVFOR MED IRINI will process your personal data and what rights you have as a data subject.

2. PURPOSE OF DATA PROCESSING: Why do we process your data?

The purpose of this processing operation is to enable Operation EUNAVFOR MED IRINI to be able to get in contact and to keep contact with all newsletter service subscribers. After the activation of the newsletter service on Operation EUNAVFOR MED IRINI website, all personal data provided will be processed by ensuring the appropriate level of security. Personal data will be processed in electronic form, collected and stored by the Operation Headquarters only for exclusive purposes related to the newsletter service delivery. Operation EUNAVFOR MED IRINI may also conduct surveys to receive and analyse the views of the recipients about the newsletter and to potentially publish the views and/or the analysis anonymously on the website or social media accounts.

3. DATA PROCESSED: What data do we process?

Operation EUNAVFORMED IRINI will process any personal data that you have provided to us or that we have legitimately collected. This may include contact details or browsing data. Contact details: first name, last name, e-mail address, telephone number, the content of the message you sent, and any other personal data you may have provided during your communications with us. We will process such personal data, should you submit any inquiries, request information or send us communications of any type. This personal data needs to be processed in order to enable
us to provide a response to your inquiries or requests. The provision of any further personal data should be considered optional.

**Browsing data:** during the course of their normal functioning, the IT and telecommunications systems, as well as the software processes that exist to ensure the proper functioning of the Website, collect certain data: for example, the access date and time, the pages visited, the name of the Internet Service Provider and IP address used to access the Internet, the internet address from which you connect to our Website, etc. The transmission of such data is implicit in the use of web communication protocols or is useful for the improved management and optimization of the data and e-mail sending system.

4. **PROCEDURE: How is your personal data processed?**

Your personal data is processed by Operation EUNAVFOR MED IRINI manually and/or using IT and telecommunications tools. Operation EUNAVFOR MED IRINI will process such data for specific purposes and only where there is a specific legal basis for doing so as laid down by current personal data privacy and protection legislation. Specifically, we will process your personal data only when one or more of the following legal bases have been satisfied:

- you have freely given your specific, informed, clear, and unambiguous consent to the processing of such data;
- the processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract;
- Operation EUNAVFOR MED IRINI has a legitimate interest in processing such data;
- Operation EUNAVFOR MED IRINI is legally obligated to process the personal data.

The following table sets out the purposes for which Operation EUNAVFORMED IRINI processes your personal data and the legal bases for doing so.

<table>
<thead>
<tr>
<th>Purpose of processing</th>
<th>Legal basis</th>
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<tbody>
<tr>
<td>To enable users to use all the Website's functions</td>
<td>Performance of a contract</td>
</tr>
<tr>
<td>To check the correct functioning of the Website</td>
<td>Performance of a contract</td>
</tr>
<tr>
<td>To ascertain responsibility in the event of computer crimes detrimental to the Website; detection, prevention, mitigation, or verification of fraudulent or illegal activities in connection with the services provided by the Website; implementation of security controls required by law</td>
<td>Legitimate interest</td>
</tr>
<tr>
<td>To respond to a query or request submitted by the data subject</td>
<td>Take steps at the request of the data subject prior to entering into a contract</td>
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</tbody>
</table>

The provision of your personal data is necessary in all cases where the data processing is a legal requirement or when it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract. Any refusal may make it impossible for us to fulfill the purpose for which your personal data is collected.

However, the provision of your personal data is voluntary when required for any other purposes: in such cases, the absence of your consent shall have no impact on the completion of the contract. The obligatory or discretionary nature of the data provision shall be indicated at the time of its collection.
5. **DATA CONTROLLER: Who is entrusted with processing your data?**

The data controller determining the purpose and means of the processing is the EUNAVFOR MED IRINI Operation Headquarters – Media Cell. The Media Cell entrusted with managing the Operation newsletters under the supervision of the Operation Commander.

6. **RECIPIENTS OF THE PERSONAL DATA: Who has access to your data?**

Your personal data may be made available to:

- EUNAVFORMED IRINI relevant personnel;
- third party companies or other entities, which provide outsourced services to Operation EUNAVFOR MED IRINI to enable the Website and Newsletter service to function.

7. **ACCESS, RECTIFICATION, ERASURE OF DATA: What rights do you have?**

You have the right to access your personal data and the right to request for correction of any inaccurate or incomplete personal data, as well as to request the removal of your personal data, which will be implemented within 10 working days after your request has been deemed legitimate. If you have any questions concerning the processing of your personal data, you may address them to the following functional mailbox of the respective Data Controller:

EUNAVFOR MED IRINI – Operation Headquarters – MEDIA CELL:
media_pio@euohq.difesa.it

8. **TIME LIMIT - DATA STORING: For what period is your data stored?**

Your Personal Data will be stored as long as the subscription to the Newsletter service will be in force.

9. **DATA PROTECTION OFFICER: Any questions to the DPO?**

Should you not be satisfied with the response received by EUNAVFOR MED IRINI – Operation Headquarters - Media Cell, you can contact the Data Protection Officer – EUNAVFOR MED IRINI LEGAD CELL (legad@euohq.difesa.it).

Should you still have complaints or remarks on how your personal data is processed by Operation EUNAVFOR MED IRINI, you have the right to lodge a complaint with the European Data Protection Supervisor.