

Food for soul – Privacy Policy

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INTRODUCTION

This Privacy Policy describes the Processing activities carried out by Food for soul concerning your Personal Data in connection with your use of Food for soul website at www.foodforsoul.it (the “Website”).

Please send your questions, comments and requests regarding this Privacy Policy to the following email address info@foodforsoul.it.

Term	Definition
Food for soul	Food for soul is a non-profit organisation established in Italy with a registered office at <i>Via Rua Muro, 85 Modena</i> – Italy. Food for soul is the data controller for the Processing activities described in this Privacy Policy.
Data transfer outside the EEA	Any transfer of personal data from the European Union to a country outside the the European Economic Area (EEA), namely Austria, Belgium, Bulgaria, Croatia, Czech Republic, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom, Iceland, Liechtenstein and Norway.
GDPR	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation).
Legal basis	Basis on which Processing is carried out in accordance with Articles 6 to 9 of the GDPR.
Personal Data	Any information relating to an identified or identifiable natural person that enables him/her to be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Processing	Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Purpose	Goal pursued by Food for soul for the Processing of your Personal Data.
Recipient	Natural or legal person, public authority, agency or another body, to which the Personal Data are disclosed.

1. OVERVIEW OF THE DATA PROCESSING CARRIED OUT BY FOOD FOR SOUL

The table below summarises the data Processing carried out by Food for soul. You may refer to the sections below for further information on our Processing.

Purposes of the Processing	Legal basis	Recipients	Data transfer outside the EEA	Retention period
Recruitment of volunteers	Consent and legitimate interest of Food for soul to develop its activity	Google Drive	Data stored on Google Drive can be transferred worldwide	Data are kept for the period during which you volunteer for Food for soul
Management of the user relationship	Legitimate interest of Food for soul to handle its users requests	Google Drive	Data stored on Google Drive can be transferred worldwide	Data are kept as long as necessary to answer the users requests
Marketing, and communication by email (e.g. newsletter sent by email)	Consent	MailChimp and Google Drive	From Italy to the United States	Data are kept as long as the user opts out from the mailing list
Enhancement of the user online experience (cookies)	Legitimate interest of Food for soul to enhance customers' online experience			13 months
Enable and facilitate communication by electronic means (cookies)	Legitimate interest of Food for soul to enhance customers' online experience			13 months

2. CATEGORIES OF PERSONAL DATA COLLECTED

Information you give to Food for soul. You may provide information by contacting Food for soul via the Website or by email, social media, subscribing to Food for soul’s mailing list, or by following our “*Get involved*” procedure to become a volunteer.

This information notably includes:

- your name;
- your year of birth; and
- your email.

Technical usage information. When you visit the Website, Food for soul collects the information sent to it by your computer, mobile phone, or other device.

This information notably includes:

- mobile network information; and
- standard web information, such as your browser type and the pages you access on the Website.

3. LEGAL BASIS

As described in the table above, the Processing activities carried out by Food for soul are based on (i) Food for soul’s legitimate interests to develop its activity and to handle its users requests, or (ii) your consent.

When the Processing is based on by Food for soul’s legitimate interest, you can object to it. For doing so, please refer to Section 8 regarding your rights.

Where the Processing is based on your consent, you can withdraw it at any time by clicking [here](#).

4. COOKIES

Cookies are text files containing small amounts of information which are downloaded to your computer or device when you visit a certain webpage. Cookies are then sent back to the originating webpage on each subsequent visit, or to another webpage that recognises that cookie.

Food for soul uses cookies strictly necessary for the proper functioning of the website, for its legitimate interest to enhance your online experience and to enable or facilitate communication by electronic means. This helps Food for soul to improve the services it provides to you and the way the Website works.

For more information about cookies, please refer to our Cookies Policy.

5. RECIPIENTS

Food for soul does not sell, rent or lease your Personal Data to others.

Further, Food for soul does not share your Personal Data to others except as described in the above table of this Privacy Policy. These Recipients are the following:

- Google Drive, cloud storage provider located in the United States and which stores your Personal Data worldwide, to store the data relating to user relationship management;
- MailChimp, marketing solutions provider, located in the United States and which stores your Personal Data in the United States, to send and manage emails that are sent to you through our mailing list;

Food for soul also shares your Personal Data to third parties in the event that Food for soul sells any business and/or assets, and that your Personal Data are concerned by this sale.

Food for soul will share your Personal Data with law enforcement agencies, public authorities or other organisations if legally required to do so.

6. TRANSFER OF YOUR PERSONAL DATA OUTSIDE THE EEA

Most internal and external Recipients are located in an EEA Member State.

However, certain Personal Data are transferred to or made accessible to third parties located in a country outside the EEA which does not ensure a level of protection equivalent to that in force in the EEA¹.

Similarly, some external Recipients are located in a country outside the EEA or subcontract some of their activities themselves to a processor located in a country outside the EEA that does not provide an adequate level of protection.

In such cases, Food for soul guarantees the supervision of such transfers under the conditions provided for by the GDPR. These frames are shown in the following table:

Categories of Personal Data	Internal or External Recipients	Transfer outside the EEA	Legal basis for the transfer
Contact details (name, first name, email address) and cookies	MailChimp (external recipient)	From Italy to the United States	Privacy Shield
User details (name, surname, country, city email address and date of first contact)	Google Drive (external recipient)	Data stored on Google Drive can be transferred worldwide	Appropriate safeguards are provided for by model contract clauses and an adequate level of protection can be confirmed by adequacy decisions such as Privacy Shield

If you wish to obtain a copy of these guarantees, you can send your request to info@foodforsoul.it.

¹ The European Commission has so far recognized as adequate the regulation of the following States: Andorra, Argentina, Canada (only for Personal Data collected, processed or disclosed in the context of a commercial relationship), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and United States (only if in the context of Privacy Shield).

7. RETENTION

Food for soul retains your Personal Data as described in the table above.

After you have terminated your use of the Website, Food for soul stores your Personal Data in an aggregated and anonymised format.

8. YOUR RIGHTS

In certain circumstances, you have rights in relation to the Personal Data Food for soul holds about you. The table below sets out an outline of those rights and how to exercise them.

Please note that Food for soul will require you to verify your identity before responding to any requests to exercise your rights. To exercise any of your rights, please email info@foodforsoul.it. Please note that for each of the rights below, Food for soul may have valid legal reasons to refuse your request, in such instances Food for soul will let you know if that is the case.

Right	Content
Access	You have the right to know whether Food for soul processes Personal Data about you, and if Food for soul does, to access Data Food for soul holds about you and certain information about how Food for soul uses it and who Food for soul shares it with. You can request a copy of these Data.
Correction	If you believe that the Personal Data Food for soul holds about you are inaccurate or incomplete, you have the right to request its correction or modification.
Erasure	You may request that Food for soul erases the Personal Data Food for soul holds about you in the following circumstances: (i) where you believe it is no longer necessary for Food for soul to hold the Personal Data, (ii) Food for soul is Processing it on the basis of your consent and you wish to withdraw your consent, (iii) Food for soul is Processing your data on the basis of Food for soul's legitimate interest and you object to such Processing, (iv) you no longer wish Food for soul to use your data to send you marketing or (v) you believe Food for soul is unlawfully Processing your data.
Restriction of Processing	You have a right to require Food for soul to restrict of Processing the Personal Data Food for soul holds about you in the following circumstances: (i) if you dispute the accuracy of your Personal Data, (ii) if the Processing is unlawful and you object to its deletion, (iii) if you believe that Food for soul no longer needs your Personal Data but that it is still necessary for you to establish, exercise or defend your legal rights or, (iv) if you have objected to Food for soul Processing Personal Data Food for soul holds about you.
Objection	You have the right to object to the Processing of the Personal Data Food for soul holds about you and Food for soul will consider your request. Please provide Food for soul with detail as to your reasoning so that Food for soul can assess whether there is a compelling overriding interest in Food for soul continuing to process such data or Food for soul needs to process it in relation to legal claims.

9. COMPLAINTS

In the event that you wish to make a complaint about how Food for soul processes your Personal Data, please contact Food for soul in the first instance at the following email info@foodforsoul.it and Food for soul will endeavour to deal with your request as soon as possible.

This is without prejudice to your right to launch a claim with the data protection supervisory authority in the European Union country in which you live or work where you think Food for soul has infringed data protection laws.

10. CHANGES

Any changes Food for soul will make to this Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this Privacy Policy.