

## ANNEX 2

### PERSONAL DATA PROCESSING POLICY

We wish to inform you that, for the fulfilment of the aims set out below and in compliance with art. 13 of the European Regulation no. 679 of 2016 (the "Privacy Regulation") and Legislative Decree no. 196 of 30 June 2003 (the "Privacy Code") as applicable, our association Cross-border Film School shall collect and process personal data relating to you (the "Data Subject").

#### 1. Data Controller, Data Processors and Data Protection Officer.

The controller of the processing of personal data is the Cross-border Film School association (hereinafter, the "Controller" or "Association"), with registered office in Gorizia, Piazza della Vittoria no. 41, tax code: 91048090319, email: crossborderfilmschool@gmail.com.

The updated list of Data Processors, where appointed, may be provided at the request of the Data Subject.

Should a Data Protection Officer be appointed (pursuant to art. 37 of the Privacy Regulation), the identification data of the same shall be disclosed by publication in addition this notice.

#### 2. Purpose and method of processing.

The Data Subject's personal data (in particular, name, surname, tax code, address, telephone and email addresses, paper and/or digital reproductions of identification documents, personal photographs, bank data) are processed within the scope of the Data Controller's ordinary business activity, i.e. any activity falling within its corporate purpose and, in any case, decided by resolutions of the corporate bodies in ordinary or extraordinary session, and more specifically for the pursuit of the following purposes:

(i) to fulfil or to require the fulfilment of specific contractual and legislative obligations or to perform specific tasks required by laws, EU legislation or regulations (e.g., accounting, payroll, social security, welfare, tax compliance, etc.);

(ii) including outside the cases referred to in point (i) above, in accordance with the law and for specified and legitimate purposes, to keep accounts or payment of fees for the activity carried out, as well as the related management of accounts;

(iii) to assert or defend a right, including a right of a third party, in judicial proceedings, as well as in administrative proceedings or in arbitration and conciliation procedures in cases provided for by law, EU legislation or regulations;

(iv) to fulfil obligations arising from insurance contracts designed to cover risks associated with the performance of work or professional activity;

(v) for other activities in any way connected with the management of the existing contractual relationship with the Data Subject, or contractual relationships connected in any way (e.g. as concerning the same production project or similar/related projects) with the existing contractual relationship with the Data Subject.

All of the above is valid both in Italy and abroad, in every country in the world, therefore both in the European Union and outside of it, and the Data

Subject expressly acknowledges and accepts that, in light of the global characteristics of the market in which we operate and in which intellectual works circulate, the aforementioned territorial extension is essential and unavoidable for the Association.

According to the above-mentioned purposes, the processing of personal data is carried out through the implementation of appropriate technical and organizational measures aimed at ensuring compliance with the Privacy Code and the Privacy Regulations, as well as through external parties (e.g., for the processing of salary and contribution data), which may qualify as autonomous Data Controllers or be designated in writing as Data Processors. In any case, the processing shall be carried out through manual, computerized and telematic means, with logics strictly related to its purposes and, in any case, in such a way as to ensure confidentiality and security of personal data in compliance with the applicable legislation.

Your data will be kept by the Association for the period of time strictly necessary to ensure the proper fulfilment of the aforementioned contractual obligations, without prejudice to the need for a longer storage period in compliance with the regulations, including accounting regulations, in force. Notwithstanding the foregoing, you expressly acknowledge and agree that, in view of the characteristics and practices of the market in which we operate and the significant duration of the terms of legal protection of the intellectual property rights of the works and projects circulating on that market, your data shall be subject to retention for the entire aforementioned term of duration, or the longer term from time to time in force according to the regulations applicable in the various countries of the world or, in any case, necessary to allow the smooth circulation of such works and projects.

3. Compulsory or optional nature of data provision, consequences of refusal and legal basis for processing.

With reference to the aforementioned purposes related to contractual and legal obligations, the provision of personal data is compulsory, as absence thereof would result in the impossibility of carrying out the contractual relationship in compliance with the law.

With reference to the purposes referred to in points (i), (ii), (iii), (iv) and (v) of paragraph 2 above, the legal basis for the processing of personal data is the performance of the contractual relationship to which the Data Subject is a party (pursuant to art. 6, par. 1, letter b of the Privacy Regulation).

4. To whom and in what sphere we may transmit the personal data of the Data Subject.

In relation to the above-mentioned purposes of processing, and to the extent strictly relevant to those purposes, your personal data will or may be disclosed, in Italy, or in any case within the territory of the European Union (except as provided in the last paragraph of this article), to the following entities or institutions:

- (i) financial administration and tax authorities;
- (ii) credit institutions;

(iii) relevant social security institutions/pension funds and, for inspection purposes, bodies in charge of social security and health supervision;

(iv) the Judicial Police for investigation purposes and, more generally, the Judicial Authority;

(v) all other parties to which your personal data, from time to time, must be communicated in and for the performance of the existing legal relationship with the Controller including, by way of mere indication and not limited to: the counterparties to the legal relationship at hand, the Ministry of Culture, the regional Film Commissions, Italian and foreign public and private television broadcasters and/or in any case all public and private, Italian and/or EU and/or international parties operating in the cinema and audiovisual industry;

(vi) brokerage firms and insurance companies for the purpose of entering into appropriate insurance policies, as well as any premium collection related to accident and similar policies (where applicable based on the role held);

(vii) external consultants (e.g., for the management of tax obligations), if not designated in writing as Data Processors.

The above-mentioned parties, to whom your personal data will or may be disclosed (insofar as they are not designated in writing as Data Processors), shall process the personal data in their capacity as Data Controllers, in full autonomy, being unrelated to the original processing performed by the Data Controller.

With the exception of the purposes set forth in paragraph 2 above, your personal data shall not be subject to disclosure, unless such disclosure is necessary as a result of an order or the need to comply with principles arising from primary or secondary legislation, administrative acts, a decision of a judicial authority or for the performance of the authorized activities and purposes.

In the event of contractual agreements between the Association and a company operating in a third country, an international organization or in the event of corporate transactions between the Association and a company operating in a third country or an international organization having as their object, purely by way of indication and not exhaustively, the transfer of rights, the transfer of a branch of business, the acquisition of corporate shares directly or indirectly involving the Association, your personal data, to the extent and in the manner strictly necessary, will or may be transferred to a third country and/or an international organization.

#### 5. The rights of the Data Subject.

Pursuant to art. 13, par. 2 of the Privacy Regulation, at the time when personal data are obtained, the Data Subject is entitled to obtain from the Data Controller the following further information necessary to ensure fair and transparent processing and, more specifically, relating to:

a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;

b) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing

concerning the data subject or to object to processing as well as the right to data portability;

c) where the processing is based on point (a) of art. 6, par. 1 or point (a) of art. 9, par. 2, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;

d) the right to lodge a complaint with a supervisory authority;

e) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;

f) the existence of automated decision-making, including profiling, referred to in art. 22, par. 1 and 4 and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject.

You expressly acknowledge that you have been exhaustively informed by the Data Controller about the aforementioned further information referred to in art. 13, par. 2, letters a), b), c), d), e), f) of the Privacy Regulations. The list of subjects to whom the personal data of the Data Subject may be communicated can be found at the Association in its capacity as Data Controller.

#### 6. Security Measures.

The Data Subject's personal data are processed in compliance with applicable law and by means of appropriate technical and organizational measures so as to ensure a level of security appropriate to the risk, in compliance with applicable EU and national legislation.

#### 7. Changes to the Privacy Policy.

This policy is subject to change made by the Data Controller; the Association will provide the Data Subject with reasonable notice of such changes with respect to the date on which the new policy shall become effective.

In view of this Notice, which has been provided to me in accordance with art. 13 of the Privacy Regulations, I hereby acknowledge that my personal data will be processed for the purposes outlined in art. 2 "Categories of personal data, purposes and legal basis for the processing of personal data" of this Notice.

Place \_\_\_\_\_, date \_\_\_\_\_

The Data Subject \_\_\_\_\_