

PRIVACY POLICY
PURSUANT TO ARTICLES 13 AND 14 OF EUROPEAN REGULATION NO. 679/2016 (GDPR)

1. Data Controller

The Data Controller is Filmmaster S.p.A., with its registered office at Piazza Venezia 11, 00187 Rome, Italy.
The Data Subject is any individual who submits their personal data for the volunteer selection process for the Closing Ceremonies of the Winter Olympic Games and the Opening Ceremonies of the Winter Paralympic Games (hereinafter, also jointly, the "Ceremonies").

2. Data Processed

The Data Controller will collect personal data such as: name, surname, date and place of birth, contact information (email, telephone), tax code, address, photographic images, availability, previous experience, spoken language, any logistical preferences, a copy of an identity document and a photo, and any other data provided through the online registration form.

The photographic image collected through the online form will be processed exclusively for organizational, logistical, and security purposes, such as the preparation of identification badges, access management, and the recognition of volunteers during activities related to the Ceremonies.

The provision of certain personal data (marked as mandatory in the form) is necessary to participate in the selection process and to allow for the organization of activities related to the Ceremonies. Failure to provide this data will make it impossible to proceed with the application.

3. Legal Basis for Processing

Processing is necessary for the performance of pre-contractual measures adopted at the request of the data subject for the purpose of participating in the selection for the Ceremonies, pursuant to Article 6(1)(b) GDPR, as well as to fulfill legal and regulatory obligations related to the organization of the Ceremonies themselves, pursuant to Article 6(1)(c) GDPR. In some cases, processing may also occur based on the Data Controller's legitimate interest, pursuant to Article 6(1)(f) GDPR, to ensure the security and organizational effectiveness of the event.

4. Methods of Processing

Data will be processed primarily using IT tools, adopting appropriate security measures to minimize the risks of accidental destruction or loss of data, as well as the risk of unauthorized access or processing.

5. Parties Authorized to Process Data

Data will be processed in a manner that ensures its security and confidentiality, with particular attention to the use of appropriate technical and organizational measures:

- Data will be processed exclusively by Filmmaster personnel specifically authorized to process it.
- Data may be transmitted to third parties belonging to the following categories:
 - Company personnel specifically authorized to process data;
 - External consultants (e.g., IT consultants, HR consultants, project managers, labor consultants, accountants, and lawyers);
 - Milano Cortina 2026 so that, in relation to the selected Data Subject, they can proceed – after verification with the Public Security Authority – with the issuance of accreditation for participation in the Ceremonies. Processing by Milano Cortina 2026 will, therefore, take place within the scope of the organization of the Games and for any related legacy purpose with the International Olympic Committee and the International Paralympic Committee;
 - Public authorities in charge of inspection activities;
 - Judicial authorities in cases provided for by law;
 - Third-party providers of processing, administrative, or instrumental services necessary to achieve the purposes referred to in Article 3;
 - Other public or private entities in cases provided for by EU or Italian law.

The aforementioned entities will carry out processing activities, as appropriate, as data processors and/or independent data controllers. The list of such entities can be requested from the Data Controller in the manner described in paragraph 9 below.

The Data Controller adopts every appropriate and/or necessary measure to ensure that communication takes place in compliance with applicable law.

6. Duration of Processing

Personal data will be stored for the time necessary for their processing, based on the purposes indicated in this policy.

At the end of the selection procedure, all data will be permanently deleted. Only the data of candidates selected for the Milano Cortina 2026 Ceremonies will be retained for a longer period, necessary to complete the volunteering activity.

7. Obligation to Process

Failure to provide personal data will result in the impossibility of completing the selection process and, therefore, participating in it.

8. Data Profiling

Pursuant to Article 13(2)(f) of the GDPR, you are informed that the personal data collected will not be subject to automated decision-making processes, including profiling pursuant to Article 22(1) and (4) of the GDPR.

9. Data Subject Rights

Pursuant to Articles 13(2)(b), (c) and (d), 15, 16, 17, 18, 19, 20 and 21 of the GDPR, the Data Subject – if the conditions provided by law are met – has the right to:

a) Request access to their personal data, with indications on: * Purposes of processing; * Categories of data processed; * Recipients or categories of recipients to whom the data has been or will be communicated (specifying whether located in third countries or international organizations); * Retention period of the data or criteria used to determine it; * Existence of the right to rectification and/or erasure of personal data, restriction of processing, and objection to processing; * Right to lodge a complaint with a supervisory authority; * Origin of the data; * Any existence of automated decision-making processes and the logic applied.

b) Obtain: * Rectification of data, if inaccurate or incomplete; * Erasure of data, if the conditions of Article 17 of the GDPR are met (e.g., data no longer necessary for the purposes for which they were collected, withdrawal of consent without another legal basis for processing, unlawful processing, etc.); * Restriction of processing, in the following cases: 1. For the time necessary to verify the accuracy of the data in case of dispute; 2. If the processing is unlawful, but restriction is requested instead of erasure of data; 3. If the Controller no longer needs to process the data, but the Data Subject requires them to exercise a right in court; 4. For the time necessary to evaluate the potential prevalence of the Controller's legitimate interests over those of the Data Subject, in case of objection to processing. * Data portability, in a structured, commonly used and machine-readable format, to transmit them to another controller, if the processing is based on consent or contract and carried out by automated means. The Data Subject may request direct transmission to the new Controller, if technically feasible.

c) Object to the processing of their data, if carried out pursuant to Article 6.1(e) (Controller's legal obligation) or 6.1(f) (Controller's legitimate interest) of the GDPR, unless there are prevailing legitimate grounds for the Controller.

d) Lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali). The exercise of these rights can take place by written communication sent to the Company's registered office or via e-mail to: privacy@filmmaster.com.