

Privacy Policy

Makoto S.S.D. a R.L. (hereafter "MAKOTO") is committed to protecting the privacy and security of the personal information that is provided during the performance of its services.

MAKOTO processes personal information in accordance with the Italian Data Protection Code and the EU General Data Protection Regulation.

This privacy policy explains how MAKOTO may collect and use any personal information that MAKOTO obtains about you and your rights in relation to that information.

MAKOTO may provide you with additional privacy notices where MAKOTO believes that it is appropriate to do so. Those additional notices supplement and should be read together with this privacy policy.

1. Data Controller

MAKOTO S.S.D. a R.L., an Italian non-profit amateur sports company, VAT number 01252420326, with registered office at Androna Campo Marzio 9, 34123 Trieste, Italy, is the data controller of your personal information provided to MAKOTO or collected by MAKOTO during the performance of its services.

2. Personal data MAKOTO processes

Personal data MAKOTO processes about you includes:

- i. Your name and contact details (for example name, address, phone number or email address), and other basic information;
- ii. Identification and basic information provided by the user or collected as part of the registration process on the website www.makotokai.academy (hereafter "Website")
- iii. Information provided to MAKOTO for the purposes of attending seminars and events;
- iv. Information in relation to materials and communications that MAKOTO sends to you electronically, for example use of marketing e-mails;
- v. Any other information relating to you which you may provide to MAKOTO.

MAKOTO collects this information when:

- i. You requires to subscribe to the on-line education (hereafter "Education") offered by MAKOTO through its Website, filling in the subscription form by inserting your personal data;
- ii. You access to and use of the Education;
- iii. You interact with MAKOTO, for example when you communicate with MAKOTO staff, sign up to receive information by e-mail, or participate at stage, seminar or other event;
- iv. MAKOTO may collect personal data from other sources for example to keep your information up to date using publically available sources;
- v. You visit the Website and use cookies on the Website. To such regards MAKOTO uses cookies to collect information when you access the Website, online application tool and marketing communications. Cookies are small text files that are placed in browser directories on your computer or mobile device when you visit the Website. The Website uses session cookies and persistent cookies.

Session cookies enable you to move from page to page within the Website and any information you enter to be remembered. A session cookie is deleted when you close your browser or after a short time. Persistent cookies allow the Website to remember your preferences and settings when you visit the Website in the future. Persistent cookies expire after a set period of time.

MAKOTO uses cookies the following way:

- Google Analytics: MAKOTO uses Google Analytics which provides MAKOTO with information about how visitors use the Website. Google uses cookies as part of the process to collect anonymous information, such as the number of visitors to the Website, where they are from, the pages they visit and the length of time they have spent on the Website;
- Career site: when you access the MAKOTO's career site, a session cookie will be placed on your computer. The cookie assists in the online application process and will be deleted when you close your browser;
- Email updates: MAKOTO's marketing communications use cookies and tracking technology which helps MAKOTO to assess whether the email updates have been opened, replied,

forwarded and links followed as well as to allow you to contact us via an online contact form;

- Social plugin: MAKOTO uses a plugin for the social network Facebook which you can recognize by the logo which is placed on the Website. If you interact with this social network, the relevant information will be forwarded and your visit recognized by Facebook.

You can change your browser settings to block cookies or to alert you when cookies are being sent to your device. Please note that if you decide to disable cookies, you may not be able to access certain functions of the Website or marketing communications. By continuing to use the Website without changing your settings you consent to the MAKOTO uses of cookies.

3. MAKOTO's basis for processing your personal information

MAKOTO will only use your personal information if and to the extent that applicable law allows. MAKOTO will therefore process your personal information if:

- i. It is necessary for the performance of a service with you;
- ii. It is necessary in connection with a legal obligation;
- iii. You have given your consent (where necessary) to such use or to share your information with MAKOTO; or
- iv. If MAKOTO or a third party have a legitimate interest which is not overridden by your interests or your rights and freedoms.

4. How and why MAKOTO may share your personal information and countries MAKOTO transfers your personal data to

MAKOTO may share your personal data with trusted third parties including:

- i. MAKOTO's personnel engaged in the course of the services MAKOTO provides you;
- ii. Suppliers to whom MAKOTO outsources certain support services;
- iii. IT service providers;
- iv. Third parties engaged in the course of the services MAKOTO provides you, with your prior consent;
- v. Third parties involved in hosting or organizing events or seminars.

For the purposes set out in this privacy policy and where necessary, MAKOTO may be required to disclose your personal data to comply with legal or regulatory requirements.

MAKOTO may transfer your personal data to recipients abroad, including in countries that do not provide the same level of protection as EU laws. MAKOTO will usually do so on the basis that such a transfer is necessary for the performance of a service with the data subject(s).

5. How MAKOTO protects your personal information

MAKOTO has put in place appropriate security measures to hold your personal information securely in electronic and physical form to protect it from unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss. MAKOTO's electronic databases require logins and password authentication. MAKOTO's partners, staff and third party service providers who have access to confidential information (including personal information) are subject to confidentiality obligations.

6. How long MAKOTO keeps your personal data

MAKOTO will retain your personal information as long as necessary for the purpose for which it was collected. MAKOTO will further retain your personal information to comply with legal and regulatory obligations.

7. Your rights

You have rights that you can exercise under certain circumstances in relation to the personal information that MAKOTO holds. These rights are to:

- i. Request access to your personal information and certain information in relation to its processing;
- ii. Request rectification of your personal information;

- iii. Request the erasure of your personal information;
- iv. Request that MAKOTO restricts the processing of your personal information and object to the processing of your personal information.

If you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once MAKOTO has received notification that you have withdrawn your consent, MAKOTO will no longer process your information for the purpose or purposes you originally agreed to, unless MAKOTO have another legitimate basis for doing so. If you would like to exercise these rights, please contact us in writing by emailing dataprotection@makotokai.academy or by letter to:

Makoto S.S.D. a R.L.
Data Protection
Androna Campo Marzio 9
34123 Trieste - Italy

You will not, in general, have to pay a fee to exercise any of your individual rights. However, MAKOTO may charge a fee for access if the relevant data protection legislation allows MAKOTO to do so, in which case MAKOTO will inform you as required by the law.

If you feel MAKOTO has not handled your query or concern to your satisfaction you can contact the competent data protection authority in Italy which is the Data Protection Garante.

MAKOTO reserve the right to update and change this privacy policy from time to time in order to reflect any changes to the way in which MAKOTO processes your personal information or changing legal requirements. Any changes MAKOTO may make to its privacy policy in the future will be posted on this Website. Please check back frequently to see any updates or changes to MAKOTO's privacy policy.

March 10, 2020