Privacy notice on the processing of personal data of website users

*pursuant to Article 13 of Regulation (EU) 2016/679 ("**GDPR**")*

At a glance

Who processes your data? Fondazione Chips-IT, based in Pavia at Via Fabio Filzi 2, which has appointed a Data Protection Officer who can be contacted at dpo@chips.it.

What data, and why? Browsing data, needed for the Site to work and stay secure, and the data you enter in the forms to send a request or download a document, which is used to follow up on what you asked for. We also have a newsletter, which you will receive only if you give a specific, optional consent, and which you can unsubscribe from at any time via the link in every message.

Who do we share it with? The providers that run the Site and its related services on the Foundation's behalf. Your data is never made public.

How long do we keep it? For as long as needed for the purpose it was collected for, according to the periods set out in section 8.

What are your rights? You can ask to access, correct or erase your data, or object to its processing, by writing to privacy@chips.it, and you always have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).

1. Data controller and Data Protection Officer

The data controller is the **Centro Italiano per il Design dei Circuiti Integrati a Semiconduttore - Fondazione Chips-IT**, Tax Code and VAT No. 02937840185, with registered office at Via Fabio Filzi 2, 27100 Pavia (PV), Italy, certified email (PEC) segreteria@pec.fondazione-chipsit.it (the "**Foundation**" or the "**Controller**").

The Foundation has appointed a Data Protection Officer ("**DPO**"), who can be contacted by email at dpo@chips.it.

2. Scope

This notice describes the processing of personal data carried out through the website https://stg.chipsit.thefullproject.it/ (the "**Site**") in relation to users who browse it or use the services available on it, such as the contact form, document downloads and subscription to the Foundation's informational communications. The use of cookies and other tracking tools, including analytics and marketing tools that are installed only with the consent the user gives through the banner, is described in the Cookie Policy, available via the link on every page of the Site. These include the pixels provided by LinkedIn and Meta, which, if authorised by the user,

allow the Foundation to measure the effectiveness of its campaigns and to show content and ads on the respective platforms to people who have visited the Site (so-called *retargeting*).

The Site contains links to third-party websites and services, including the Foundation's LinkedIn page and the transparent administration and supplier register portals. Use of those sites is governed by the privacy notices of their respective operators.

3. Data processed, purposes and legal bases

a) Browsing data: the IT systems and software procedures that run the Site acquire, in the course of their normal operation, certain data whose transmission is implicit in the use of Internet communication protocols, such as the IP address, the date and time of the request, the resource requested, the server response code, the browser and operating system type and the referring site. This data is processed to make the Site work, keep it secure, and prevent and detect abuse and cyberattacks. The legal basis is the Controller's legitimate interest in the security and proper functioning of the Site, consistent with the obligation to adopt appropriate security measures under Article 32 GDPR. The same data may be used to establish liability in the event of cybercrimes against the Site.

b) Requests sent through the contact form and job applications: the Site lets users get in touch with the Foundation through two separate channels, the form on the "Contact" page and the "Work with us" section, whose processing is described below.

Form on the "Contact" page

Data processed	First name, last name, tax code, email address, phone number, type of entity (company, public body, other), the content of the message and any further data the user chooses to include.
Purpose	To handle and respond to requests for information and collaboration proposals and, where the request concerns starting a collaboration, to carry out the related preliminary activities.
Legal basis	The performance of pre-contractual measures taken at the data subject's request and, for requests not aimed at a contractual relationship or coming from representatives of companies and organisations, the Controller's legitimate interest in responding to the communications it receives and in developing relationships with the members of its ecosystem. This interest prevails over the user's rights, given that it is the user who initiates the contact, that only the data needed to follow up is processed, and that the sending of informational communications remains subject to the consent described in letter d).

"Work with us" section

Data processed	Personal and contact details, the curriculum vitae and any further information the candidate chooses to include in the application.
Purpose	To assess applications for open positions and unsolicited applications and to manage recruitment activities.
Legal basis	The performance of pre-contractual measures taken at the data subject's request.
Platform and privacy notice	Applications are collected through the InRecruiting platform, provided by Zucchetti S.p.A. acting as data processor on behalf of the Foundation pursuant to Article 28 GDPR. The related processing is described in the dedicated candidate privacy notice, provided upon registration on the platform, to which reference is made. For unsolicited applications, the notice is provided at the first available contact.

c) Document downloads: some documents published on the Site, such as the Strategic Roadmap 2026-2028, can be downloaded after providing first name, last name and email address. This data is processed to enable the download of the requested document, to send it to the email address provided and to keep track of the requests received. The legal basis is the performance of the service requested by the data subject. The download does not depend on consent to receive informational communications, which remains optional.

d) Newsletter and informational communications: in the contact form and the download form, users can choose, by ticking a specific optional checkbox, to receive the newsletter and communications about the Foundation's institutional activities, events, calls for proposals and initiatives. For this purpose, first name, last name and email address are processed. The legal basis is the data subject's consent, given pursuant to Article 6(1)(a) GDPR and Article 130 of Legislative Decree 196/2003 as amended.

e) Legal obligations and protection of rights: data may be processed to comply with obligations under the law or requests from the competent authorities and, where necessary, to establish, exercise or defend a right of the Controller in or out of court, on the basis of the Controller's legitimate interest in protecting its rights. This interest falls within the reasonable expectations of data subjects and does not override their rights and freedoms, since the processing concerns only the data strictly necessary for the defence and lasts only as long as the defence is ongoing.

4. Whether providing data is mandatory

Providing the data marked as mandatory in the forms is necessary to handle the request or enable the document download; without it, the Foundation will be unable to follow up. Providing any other data, and consenting to receive the newsletter and informational communications, is optional and can be withdrawn at any time.

5. How data is processed

Data is processed electronically by Foundation staff who are authorised and instructed pursuant to Article 29 GDPR and Article 2-quaterdecies of the Italian Privacy Code, using technical and organisational measures appropriate to ensure its security, integrity and confidentiality. The Foundation does not carry out automated decision-making, including profiling, that produces legal effects concerning the data subject or similarly significantly affects them.

6. Recipients of the data

Data may be disclosed to reliable third parties that provide the Foundation with services instrumental to the purposes described, acting as data processors pursuant to Article 28 GDPR, in particular:

- the provider of the Site's development, management and maintenance services;
- the hosting provider, with servers located in the European Union;
- the provider of the management system used to store and manage contacts, Zucchetti S.p.A.;
- the provider of the platform used to send the newsletter and informational communications;
- IT service and technical support providers and the Foundation's advisors, to the extent necessary to carry out their respective assignments.

Data may also be disclosed to third parties acting as independent controllers, such as public and judicial authorities where required by law. For the providers of analytics and marketing tools (Google, LinkedIn and Meta), which are installed only with the user's consent, please refer to section 4 of the Cookie Policy. Data is not publicly disseminated. The up-to-date list of data processors can be requested using the contact details given in section 9.

7. Transfer of data to third countries

Data collected through the Site is stored on servers located in the European Union. However, some providers belong to groups based in the United States or other third countries, and the data may be accessible to those entities, including for technical support purposes. In such cases, the transfer is based on the adequacy decision adopted by the European Commission on 10 July 2023 concerning the EU-U.S. Data Privacy Framework, for recipients that participate in it, or on the standard contractual clauses approved by the European Commission pursuant to Article 46(2)(c) GDPR, supplemented where necessary by additional measures.

8. Retention period

Browsing data is kept for no longer than 30 days, unless it needs to be kept longer to investigate unlawful activity or at the request of the authorities.

Data relating to requests sent through the contact form is kept for as long as needed to handle the request and any subsequent exchanges, and in any case for no more than 24 months from

the last contact. If the request leads to a relationship with the Foundation, the data becomes part of the records relating to that relationship and is kept for its duration and for the periods required by law.

Data relating to download requests is kept for 12 months from the request.

Data processed to send the newsletter and informational communications is kept until consent is withdrawn. If there is no interaction with the communications received for 24 months, the Foundation may delete the data or ask the data subject to confirm their interest.

In the event of a dispute, the necessary data is kept for the duration of the proceedings and until the time limits for appeal or the limitation periods expire. Once the periods indicated have elapsed, the data is deleted or anonymised.

9. Rights of the data subject

Data subjects may exercise, at any time and free of charge, the rights provided for in Articles 15-22 GDPR, which are summarised in the table below.

Access (Art. 15 GDPR)	To find out whether the Foundation processes data concerning them and, if so, to obtain a copy along with information about the processing.
Rectification (Art. 16 GDPR)	To have inaccurate data corrected and incomplete data completed.
Erasure (Art. 17 GDPR)	To obtain the erasure of data in the cases provided for by the GDPR, for example when it is no longer needed or when consent has been withdrawn.
Restriction (Art. 18 GDPR)	To have the data only stored, without being otherwise used, in the cases provided for by the GDPR, for example while its accuracy is being verified.
Portability (Art. 20 GDPR)	To receive the data provided to the Foundation in a structured, commonly used format, where the processing is based on consent or a contract and is carried out by automated means, and to request its transmission to another controller.
Objection (Art. 21 GDPR)	To object, on grounds relating to their particular situation, to processing based on the Controller's legitimate interest.
Withdrawal of consent (Art. 7 GDPR)	To withdraw consent at any time, without affecting the lawfulness of processing carried out before withdrawal.

How to exercise your rights

Requests can be sent to the Foundation by certified email (PEC) to segreteria@pec.fondazione-chipsit.it or by email to privacy@chips.it, or to the DPO at dpo@chips.it. The Foundation will

respond without undue delay and in any case within one month of receiving the request; this period may be extended by two further months where necessary, taking into account the complexity and number of requests.

Complaint to the supervisory authority

Data subjects who believe that the processing of their data infringes the GDPR have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali, www.garanteprivacy.it) or with the supervisory authority of the Member State where they habitually reside, work or where the alleged infringement took place.

10. Changes to this notice

The Foundation may amend or update this notice, including as a result of changes in legislation or in the services offered by the Site. The updated version is published on the Site with the date of the last update.

Last updated: 25 November 2026

Checkbox texts for the Site's forms

1. Form on the "Contact" page

Position: below the "Message" field and before the "Send" button.

Checkbox	Italian text	English text
Mandatory	Ho letto l'informativa privacy	I have read the privacy policy
Optional	Desidero ricevere la newsletter e comunicazioni su attività istituzionali, eventi, bandi e iniziative della Fondazione Chips-IT (facoltativo)	I would like to receive the newsletter and updates on the institutional activities, events, calls and initiatives of Fondazione Chips-IT (optional)

2. Download request for the "Strategic Roadmap 2026-2028"

Position: in the window that opens from the "Strategic Roadmap 2026-2028" block on the "About us" page, after the first name, last name and email fields and before the download button.

Checkbox	Italian text	English text
Mandatory	Ho letto l'informativa privacy	I have read the privacy policy
Optional	Desidero ricevere la newsletter e comunicazioni su attività istituzionali, eventi, bandi e iniziative della Fondazione Chips-IT (facoltativo)	I would like to receive the newsletter and updates on the institutional activities, events, calls and initiatives of Fondazione Chips-IT (optional)

3. Implementation notes

- The two checkboxes are separate, and neither is pre-ticked when the form opens.
- Sending the request and downloading the document must remain possible even if the user does not tick the newsletter checkbox, since consent cannot be a condition for obtaining the service.
- The "privacy policy" link opens the page of this notice; the link currently in the contact form points to an address that does not work.
- For each newsletter consent, the date, time and checkbox text shown at that moment are recorded, so that the Foundation can prove it was collected.
- If subscription is confirmed via a link sent by email, the subscription becomes active only once the link is clicked, consistent with section 3, letter d).
- In the contact form, in line with data minimisation, (i) the tax code field should be removed and (ii) the phone number should be made optional, since neither is needed to respond to the request; in that case, the list of data in section 3, letter b) must also be updated.