



PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA

This document is intended to inform you that your data will be processed in accordance with the following methods and purposes:

JOINT CONTROLLERS AND DATA PROTECTION OFFICER

The companies of the RINA Group (hereinafter referred to as the “Joint Controllers” or “RINA”) are the Joint Controllers of the processing and can be contacted via the contact details provided on the website www.rina.org. The Data Protection Officer can be reached at rina.dpo@rina.org.

The Joint Controllers have entered into an agreement that defines their respective roles and responsibilities. In summary, the Joint Controllers undertake to carry out all obligations required by data protection legislation, in full compliance with Group guidelines, the Code of Ethics, and internal procedures. Personal data is processed in accordance with the principles of lawfulness, fairness, and data minimization, ensuring confidentiality and privacy. The agreement establishes that the point of contact for exercising data subject rights is the email address: rina.dpo@rina.org.

1. SCOPE OF THE NOTICE AND TYPES OF PERSONAL DATA PROCESSED

RINA processes your personal data (hereinafter also referred to as “data”) contained on the SPARK platform.

If your relationship with RINA requires you to provide personal data of third parties, please remember to inform those individuals about the disclosure of their personal data and invite them to read this privacy notice. RINA will also inform them where possible.

The types of personal data processed for the purposes of this notice include:

- identification, personal and contact data (e.g., name, surname, email address);
- photographic and audiovisual images;
- data collected from our interactions with you, including in relation to the use of SPARK;
- personal data contained in access logs, usage of SPARK by registered users and related security functions, as well as data related to the devices you use (e.g., IP address and technical specifications of the device).

2. PURPOSES AND LEGAL BASES OF THE PROCESSING

The processing of the above data will pursue the following purposes:

- to ensure access to SPARK;
- to ensure the carrying out of the Challenge selection process.

Refusal to provide data will result in the inability to register your account or access certain applications, as well as to benefit from the requested services.

The legal basis for processing the aforementioned data lies in **the performance of a contract** to which you are a party or in the **execution of pre-contractual measures** taken at your request, as well as in the fulfillment of any applicable **legal obligations**.

- to ensure secure access to your reserved area and prevent unauthorized activities, such as access to protected areas of the portal by unauthorized individuals (log files);
- to ensure RINA’s right to legal defense.

The legal basis for these processes is RINA’s **legitimate interest** in improving service quality and strengthening the existing contractual relationship by keeping you informed, providing support, and ensuring a secure service. You may object to this purpose at any time by requesting the deactivation of your account as described in section 6 of this notice.

- sending newsletters, promotional materials, service offers, or invitations to participate in RINA initiatives.

The legal basis for these processes is your **consent**; you are always free to withdraw it as described in section 6 of this notice. Refusal to consent will only result in the inability to receive newsletters, promotional materials, or invitations to collaborative initiatives.



3. METHODS OF PROCESSING AND DATA RETENTION

Processing may be carried out in both paper and electronic formats.

Data processed in connection with your activities on SPARK will be retained for the time strictly necessary to achieve the purposes outlined in this notice, and in any case no longer than 10 years from the termination of the contractual relationship or 2 years from collection for marketing or engagement purposes, unless consent is renewed.

Browsing/log data will be deleted within six months of the event that generated them.

In exceptional and duly documented cases, data may be retained for longer periods to protect your rights or those of RINA, with access limited to the head of the legal department only.

4. DATA RECIPIENTS

Your data may be made accessible for the purposes described in section 2, not only to individuals authorized by RINA to process data, but also to the following recipients:

- companies or other third parties (suppliers, professional firms, consultants, partners, financial institutions, etc.) engaged by RINA and bound by appropriate legal instruments, including data processors;
- public entities, supervisory bodies, judicial and regulatory authorities, auditing firms, etc., for compliance with legal or sector-specific regulatory obligations.

5. DATA TRANSFER

Personal data is stored on servers located within the European Union. However, RINA reserves the right to transfer personal data to non-EU countries if necessary. In such cases, the transfer will be carried out in accordance with applicable legal provisions, including the use of standard contractual clauses issued by the European Commission and the adoption of binding corporate rules for intra-group transfers.

6. DATA SUBJECT RIGHTS

As a data subject, you have the right to:

- i. obtain confirmation of whether or not personal data concerning you is being processed, and to receive a copy of such data;
- ii. obtain information on: a) the origin of the personal data; b) the purposes and methods of processing; c) the logic applied in case of processing carried out with electronic tools; d) the identification details of RINA, the data processors, and the Data Protection Officer; e) the entities or categories of entities to whom the personal data may be disclosed or who may become aware of it as designated representatives, processors, or authorized subjects;
- iii. obtain: a) the updating, rectification, or integration of data; b) the erasure, anonymization, or blocking of data processed unlawfully; c) confirmation that the operations referred to in letters a) and b) have been notified, including their content, to those to whom the data was disclosed, unless this proves impossible or involves a disproportionate effort; d) receive your personal data from RINA in a structured, commonly used, and machine-readable format and, where technically feasible, obtain direct transmission of such data from one controller to another;
- iv. object to: a) the processing of your personal data, even if relevant to the purpose of collection; b) the processing of your personal data for the purpose of sending advertising or commercial communications via email;
- v. withdraw previously given consent.

As a data subject, you also have the right to lodge a complaint with the competent supervisory authority.

7. EXERCISING RIGHTS AND COMMUNICATIONS

RINA Group has appointed a Data Protection Officer, who can be contacted at any time for matters relating to the processing of your personal data and the exercise of your rights by sending an email to rina.dpo@rina.org.

You have the right to withdraw your consent at any time by writing to rina.dpo@rina.org; or by accessing your personal Preference Center via the link at the bottom of commercial



communications or published on RINA's digital services. Through the [Preference Center](#), you can modify your preferences at any time.

PRIVACY NOTICE UPDATES

This privacy notice is updated as of September 2025.

RINA reserves the right to further update the content of this notice to reflect changes in applicable privacy legislation and internal data protection procedures. RINA encourages you to periodically consult the website www.rina.org and your Preference Center for information on any changes.