

## ORGANIZATIONAL MODEL OF LIABILITY FOR PRIVACY ISSUES

Reference: Privacy Regulations of Fondazione Bruno Kessler (Section III – Article 2)

In compliance with the GDPR, FBK has defined and formalized an Organizational Model of privacy related liability aimed at the correct processing of personal data. The model is in line with the Foundation's organizational chart.

On the occasion of the annual update of the general organization chart, the Foundation, in its capacity as Personal Data Controller, also updates the line of internal responsibilities regarding the processing of personal data by identifying in the Managers of organizational articulations, regardless of their names (e.g. Centers, High Impact Lines/Areas, Units, Services, ...) the Internal Data Processors for personal data relating to processes of their concern solely. These Users are formally appointed after receiving specific training.

All those who are in charge of a project that involves the processing of personal data and have not been included in the Privacy-related Liability Organizational Model - are required to adopt an ad hoc policy tailored on the specific needs of the case (so-called Privacy by Design). These Users shall adopt the above policy in agreement with the Data Controller and through the Corruption Prevention, Transparency and Privacy Unit including as well the Data Protection Officer.