

PRIVACY POLICY

Your privacy is important to us. It is Nucleate's policy to respect your privacy and comply with any applicable law and regulation regarding any personal information we may collect about you, including across our website, <https://nucleate.org>, and other sites we own and operate.

This Privacy Policy is intended to comply, where applicable, with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and relevant Italian data protection legislation.

Personal information is any information about you which can be used to identify you. This includes information about you as a person (such as name, email address), your devices, and information about how you use a website or online service.

For EU users, this includes any information relating to an identified or identifiable natural person, as defined under Article 4 GDPR.

In the event our site contains links to third-party sites and services, please be aware that those sites and services have their own privacy policies. This Privacy Policy does not apply to any of your activities after you leave our site.

Data Controller

For the purposes of EU data protection law, the Data Controller is **Nucleate**, with registered office at 88 Gordon Street #401, Brighton MA 02135 (USA), email: hq@nucleate.org.

Personal data may also be processed by Nucleate's regional and local chapters, including **Nucleate Italy**, acting under the authority and coordination of the Data Controller.

Information We Collect

Information we collect falls into one of two categories: "voluntarily provided" information and "automatically collected" information.

"Voluntarily provided" information refers to any information you knowingly and actively provide us when using or participating in our initiatives, programs, or events.

"Automatically collected" information refers to any information automatically sent by your devices when accessing our website or online services.

Log Data

When you visit our website, our servers may automatically log standard data provided by your web browser, including IP address, browser type, pages visited, and time spent on each page.

Where required by applicable EU law, IP addresses and similar identifiers are treated as personal data and processed accordingly.

Personal Data Processed

We may collect and process the following categories of personal data:

- identification and contact data (name, email address);
 - academic and professional information;
 - application and registration materials;
 - photographs and audiovisual materials collected during events, programs, or activities.
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Legal Bases for Processing (EU)

For users located in the European Union, personal data are processed only where at least one lawful basis under Article 6 GDPR applies, including:

- the performance of organizational, selection, and participation-related activities;
- the data subject's explicit consent;
- Nucleate's legitimate interest in promoting its institutional, non-profit activities, limited to non-commercial purposes.

Consent may be withdrawn at any time without affecting the lawfulness of processing carried out prior to withdrawal.

Purposes of Processing

We may collect, hold, use, and disclose personal information for the following purposes:

- to evaluate and manage applications and registrations;

- to organize, administer, and deliver programs, events, and activities;
- to enable networking and community-building activities;
- to carry out institutional communication and dissemination activities, including publication on the official websites and social media channels of **Nucleate**, its **regional and local chapters (including Nucleate Italy)**, and its **partners**, exclusively in connection with Nucleate-related initiatives and on a non-commercial basis.

Such partners act either as authorized recipients or, where applicable, as independent data controllers, solely for dissemination activities related to Nucleate initiatives and in compliance with applicable data protection law.

Personal data will not be further processed in a manner incompatible with these purposes.

Images and Audiovisual Materials

Photographs and audiovisual materials may be collected during Nucleate events and activities and used exclusively for institutional, non-commercial communication and dissemination purposes, including publication on websites, social media channels, presentations, and communication materials of Nucleate, its regional chapters, and its partners.

Such processing is based on the data subject's explicit consent. Consent may be withdrawn at any time; withdrawal will apply to future uses and will not affect materials already lawfully published.

No commercial use, sale, or transfer to third parties for independent purposes is envisaged.

Data Retention

Personal data will be retained only for as long as necessary to fulfill the purposes for which they were collected, unless a longer retention period is required by law or justified for institutional archiving, reporting, or documentation purposes in accordance with Article 5(1)(e) GDPR.

Children's Privacy

Our services are not intended for individuals under the age of 16 without parental or guardian consent, in accordance with Article 8 GDPR.

Your Rights (EU)

If you are located in the European Union, you have the right to access, rectification, erasure, restriction of processing, objection, and data portability (Articles 15–22 GDPR).

You also have the right to lodge a complaint with your competent supervisory authority, including the Italian Data Protection Authority (Garante per la protezione dei dati personali).

International Transfers

Where personal data are transferred outside the European Economic Area (EEA), such transfers will take place only where appropriate safeguards are in place, including Standard Contractual Clauses approved by the European Commission or other lawful mechanisms under Chapter V GDPR.

Changes to This Policy

We may update this Privacy Policy from time to time. The most recent version will always be made available through our official channels.

Contact Us

For any questions or concerns regarding privacy and data protection, please contact:

Nucleate – hq@nucleate.org

Italian users may also contact Nucleate Italy (italia@nucleate.org) for matters related to local initiatives and events.
