



INTRODUCTION

CAMELOT SRL - SB (hereinafter, for brevity, CAMELOT), pursuant to and for the purposes of Article 13 of European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter, for brevity, the “GDPR” or the “Regulation”), wishes to inform you about how it will process your personal data, in compliance with the provisions of the Regulation itself and of the applicable national legislation, in relation to their use through the SaaS Debate Management System platform named CAMELOT for Debate, which enables each School to create digital and hybrid regulated-debate rooms called Debate Rooms.

1. DATA CONTROLLERSHIP AND ROLES IN THE PROCESSING

a. CAMELOT - Data Controller

When a third-party organisation (a School or an individual teacher) becomes a CAMELOT client, a so-called “*Owner*” account is activated, through which the data necessary for the management of the administrative and usage functions of the platform by the organisation are collected, together with the personal data of the natural person designated to represent it, in the case of a legal entity.

The resulting processing of personal data, communicated via the activation form, is carried out by CAMELOT as Data Controller, for the distinct purposes of various kinds indicated below.

b. OWNER - Data Controller

The processing of the personal data autonomously used by the *Owner*; through the platform, for the operational management of the various Debate Management functions – that is, by way of example but not limited to, the personal data of:

- o any members of the school organisation associated with the *Owner*; being persons designated by it to play an active role in the processing of data concerning the management of the various phases of the Debate platform;
- o the users (students) participating in the Debate Room, who access anonymously via a keyword (pseudonyms), without the platform collecting any identifying or registry data concerning them; the association between the natural person and the debate role remains the exclusive knowledge of the owner teacher, managed outside the platform.

is carried out by the *Owner* itself, pursuant to Article 4(7) of the GDPR, as Data Controller, since it is the *Owner* that determines the purposes and the consequent choice of the appropriate methods for processing the data.

In such a case, CAMELOT acts, on behalf of the *Owner* as Data Processor, limited to the services of a technical/systems nature concerning the operation of the Debate platform, provided on the basis of a specific contractual agreement drawn up pursuant to Article 28 of the GDPR, the details and specific conditions of which are fully governed by Appendix I (Standard Contractual Clauses) attached to the Terms and Conditions of use of the «Camelot for Debate» Service – a service also provided with the support of external systems engineers who, as sub-processors, are obliged to comply with the conditions established between the Controller and the Processor.

2. THE PERSONAL DATA SUBJECT TO PROCESSING

a. Data collected implicitly

Since Camelot for Debate is a *web application* accessible via the Internet, the IT systems and software procedures responsible for its operation may, in the course of their normal functioning, collect certain personal data whose transmission is implicit in the use of the Internet communication protocols. This is information that is not associated with identified data subjects but which, by its very nature, could – through processing and association with data held by third parties – make it possible to identify users. This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, addresses in URI (Uniform Resource Identifier) notation, the time and other parameters relating to the user's operating system and IT environment.

b. Data provided by users

The following is a representative list of the personal data requested from the owner user and strictly connected with the Debate Room management purposes concerning the use of the platform:

- o identifying registry personal data, such as first name and surname;
- o personal contact data, such as the e-mail address;
- o data concerning the School to which the owner user (teacher or institutional contact person) belongs;
- o work/professional data, such as the role held by the data subject (teacher) within the organisation to which they belong;
- o city and province of the school;
- o relevant school cycle;
- o subjects taught.
- o “custom” data specifically requested by the *Owner*; who creates the Debate Room.

c. Data concerning financial transactions

The platform, at present, does not directly handle payments or financial transactions. Should payment for specific services requested by the user become necessary, the user will be redirected to a dedicated purchase section, independently managed by the credit-card processor, in which all information relating to payment methods, any data required and the parties responsible for the related processing will be provided

d. Further data arising from participation in the Debate Room

During the conduct of a Debate Room, the owner, as Data Controller, manages the following additional data through the platform. It is specified that students access anonymously, without the platform collecting any registry data concerning them; the data described below therefore refer to fully pseudonymised activities or to optional features activated directly by the *Owner* who created the Debate Room:

- o the role held by the debate participants (debater, admin, speaker, judge, timekeeper, observer), recorded by the platform as a simple functional role label (e.g. “Speaker I PRO”, “Judge I”); no registry data of the students is associated with these roles; the correspondence between role and natural person is confined to the exclusive knowledge of the owner teacher, kept outside the platform;
- o audio recording of the debate, exclusively in cases where the owner chooses to upload it voluntarily to the platform to activate the optional artificial-intelligence analysis feature; the audio is not collected automatically by the system; processing takes place via Scaleway S.A.S. (France, EU), which applies zero data retention: the audio is neither stored nor used to train AI models.



USER PRIVACY NOTICE CAMELOT FOR DEBATE

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e. Cookies

The platform uses cookies to automatically collect certain information about visitors. For further information about cookies, how they work and how to accept or reject them, please see the Cookie Policy available on the platform.

3. PURPOSES OF THE PROCESSING

Your personal data will be processed for the following purposes:

- 3.1. to process the account activation request of the individual user or of the *Owner* and to manage the related pre-contractual phase;
- 3.2. to perform the requested service by means of the IT and telematic tools necessary to make available the various identified service features;
- 3.3. to manage the administrative and accounting phases connected with the requested services;
- 3.4. to contact, on the basis of the controller's legitimate interest, users who have provided their contact e-mail in order to send them follow-up communications concerning services related and/or similar to those in which they have expressed interest, save for express refusal to receive such communications, which they may also express on subsequent occasions (opt-out) by objecting to their sending, directly by means of the e-mail received;
- 3.5. subject to free, specific and separate consent, to allow the controller to carry out marketing activities by informing the data subject, by means of newsletters, paper mail, operator calls, direct selling, e-mail, pre-recorded calls and sms/mms, of promotions, discounts, concessions, commercial information and other dedicated services; to invite the data subject to take part in events and functions, to involve them in market research or to report special initiatives dedicated to customers, in the manner and at the times deemed most effective according to the various initiatives mentioned;
- 3.6. to comply with any obligations provided for by applicable laws, regulations or EU legislation, or to satisfy requests from the authorities;
- 3.7. to assert or defend, in judicial and/or administrative proceedings, a legitimate right, including that of a third party.

4. LEGAL BASES AND MANDATORY OR OPTIONAL NATURE OF THE PROVISION OF DATA

To provide you with a complete picture, the summary table below sets out, for each purpose, the corresponding legal basis as well as the mandatory or optional nature of the provision of the data:

Purpose	Legal Basis	Mandatory or optional nature of the provision
3.1 to process the account activation request of the individual user or of the <i>Owner</i> and to manage the related pre-contractual phase; 3.2 to perform the requested service by means of the IT and telematic tools necessary to make available the various identified features;	Article 6(1)(b) GDPR – processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	the provision of personal data for these purposes is optional, but any failure to provide it would make it impossible to activate the requested services
3.3 to manage the administrative and accounting phases connected with the requested services;	Article 6(1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject	The processing of data for such purposes is mandatory on the basis of the applicable tax and fiscal rules concerning electronic invoicing, the keeping of tax registers, etc.
3.4 to contact, on the basis of the controller's legitimate interest, users who have provided their contact e-mail in order to send them follow-up communications concerning services related and/or similar to those in which they have expressed interest, save for express refusal to receive such communications, which they may also express on subsequent occasions (opt-out) by objecting to the sending of such communications, directly by means of the e-mail received	Article 6(1)(f) GDPR – processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child	The controller may have an interest in wishing to communicate the expansion or extension to other innovative services, and the data subject may exercise the right to object to receiving such communications through the e-mail received, requesting the immediate deletion of the e-mail address from the list of recipients
3.5 subject to free, specific and separate consent, to carry out marketing activities by informing the data subject, by means of newsletters, of promotions, discounts, concessions, commercial information and other dedicated services, by paper mail, operator call, direct selling, or by e-mail, pre-recorded calls and sms/mms. In this context we may also process your personal data in order to invite you to take part in events and functions, to involve you in market research or to report special initiatives dedicated to customers, in the manner and at the times we deem most effective according to the various initiatives mentioned	Article 6(1)(a) GDPR – the data subject has given consent to the processing of their personal data for one or more specific purposes	the provision of personal data for this purpose is optional and the data subject will in any case, and on each occasion, have the possibility of withdrawing consent, requesting the deletion of their e-mail address from the list of those to which the aforementioned messages are sent. Failure to provide consent for such purposes does not affect the provision of the other services.
3.6 to comply with any obligations provided for by applicable laws, regulations or EU legislation, or to satisfy requests from the authorities	Article 6(1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject	once the personal data have been provided, their processing is indeed necessary to comply with legal obligations to which the Controller is subject
3.7 to assert or defend, in judicial and/or administrative proceedings, a legitimate right, including that of a third party	Article 6(1)(f) – processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child	should it become necessary to investigate suspicious activities or breaches of our contractual conditions and to protect the security of the data, the data subject may nevertheless object to the processing carried out on the basis of the Controller's legitimate interest, unless the processing must be carried out for the establishment, exercise or defence of a right in legal proceedings



5. SCOPE OF COMMUNICATION AND DISCLOSURE OF PERSONAL DATA

Your personal data will not be disseminated by CAMELOT, as Data Controller, and will be processed solely by persons duly instructed and able to provide adequate technical and organisational safeguards, as well as bound to the utmost confidentiality by the Controller.

Your personal data may be communicated, for the purposes referred to in section 3 of this notice, to the following parties:

- 5.1. persons authorised to process personal data, necessary to carry out activities strictly related to the provision of the requested services, who are bound by confidentiality or have an appropriate statutory obligation of confidentiality.
- 5.2. parties (natural and/or legal persons) typically acting as Data Processors, namely:
 - parties delegated to carry out development and technical/systems maintenance activities for applications;
 - parties responsible for providing cloud hosting services for IT platforms;
 - parties specialised in providing services for the analysis of audio media and text processing with Artificial Intelligence support;
 - a) with reference to the 3 categories indicated above, it is noted that at present the Controller relies on the support of the provider Lovable Labs Incorporated, located at 1111b South Governors Avenue, Dover, DE 19904, USA, provider of the technological platform with which Camelot for Debate is built, which acts as a sub-processor; the transfer of data to that party, which for that specific purpose uses servers and platforms based in Europe (Ireland), is governed by a Data Processing Agreement entered into between the parties; for the optional AI-analysis feature, the Controller also relies on Scaleway S.A.S. (Paris, France) as a sub-processor, with infrastructure located entirely in France and zero data retention.
 - parties specialised in providing consultancy services of an administrative, fiscal, tax, legal, personal-data-processing nature, etc.;
- 5.3. parties (natural and/or legal persons) typically acting as independent data controllers, to whom it is mandatory to communicate your personal data in view of the service provided (credit-card processors and similar financial services, etc.).

Such parties will be allowed to access only the personal data necessary to carry out the functions assigned to them, subject to a commitment not to use the data for other purposes and in compliance with applicable regulations.

The complete list of data processors is available by sending a written request to the contact details indicated in the "Contacts" section of this notice..

6. TRANSFERS OUTSIDE THE EU

Should it become necessary to transfer your personal data outside the European Economic Area (EEA), to third parties carrying out, on our behalf, tasks of a technical, logistical and organisational nature consistent with the pursuit of the purposes for which your data were collected and processed, this will only occur where it is possible to ensure a level of data protection equivalent to that of the EU.

It is noted that, following the migration completed on 19 June 2026, the AI processing of debate audio takes place via Scaleway S.A.S. (France, EU): no data relating to this feature is transferred outside the European Economic Area. Non-EU transfers remain, limited to other technical sub-processors (e.g. Resend for transactional e-mails), governed by Standard Contractual Clauses pursuant to Article 46 GDPR.

We ensure that the transfer of your personal data takes place only against the implementation of at least one of the following security measures, as provided for by the Regulation:

- transfer of your personal data to countries whose level of data protection has been recognised as adequate by the European Commission. For more information, please consult the European Commission page: "Adequacy of the protection of personal data in non-EU countries".
- provision of specific Standard Contractual Clauses (EU Model Clauses), approved by the European Commission, in order to ensure that the processing carried out outside the European Economic Area (EEA) by our partners offers guarantees for the protection of your personal data compliant with those carried out within the territory of the European Union. For more information, please consult the European Commission page: "Model contracts for the transfer of personal data to third countries", pursuant to Article 46(2)(c)
- Ultimately, on the basis of the derogations set out in Article 49, which include the explicit consent given by the data subject, having been previously informed of the transfer.

Adequate information on the safeguards protecting your personal data, where transferred outside the European Economic Area, is available by contacting the Controller at the details indicated below.

7. PROCESSING METHODS – INFORMATION ON THE USE OF SYSTEM ADMINISTRATORS

The processing will be carried out mainly with the aid of telematic and IT tools and will be based on the principles of privacy by default and by design, fairness, lawfulness, transparency and protection of the rights of data subjects and their confidentiality.

The System Administrators employed by Camelot and by all the Processors and sub-processors used for the personal-data processing activities concerning the CAMELOT for Debate platform operate on the basis of the provisions of the Order [*Measures and arrangements prescribed for controllers of processing carried out with electronic tools in relation to the assignment of system-administrator functions - 27 November 2008 \(published in Official Gazette No. 300 of 24 December 2008\)*](#) and by the supplements provided for by the Order of [*25 June 2009*](#).

Any access carried out by System Administrators to the CAMELOT for Debate platform is constantly monitored by logging software which, in terms of completeness, unalterability and the ability to verify their integrity, complies with the requirements set out in the combination of the two aforementioned orders, including the time references and the description of the event that generated them.

The data will be processed in such a way as to minimise the risks of destruction, loss, unauthorised access, or processing that is not permitted or not consistent with the purposes of the collection.

8. MANAGEMENT OF ACCESS CREDENTIALS TO THE CAMELOT PLATFORM

Each registered user is given a personal profile on the CAMELOT for Debate platform where they can thus make use of the basic features made available by the software.

The access credentials in this case will consist of the login-password combination chosen by the user.

The data controllership for this service lies with CAMELOT.

9. SECURITY AND QUALITY OF PERSONAL DATA

By processing of personal data we mean any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation,



use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, and may consist – also depending on the decisions made by the data subject as to how to use the services – of textual information, photographic images or videos and/or any other information capable of making the data subject identified or identifiable.

The Controller undertakes to protect the security of the user's personal data and to comply with the security provisions laid down by the applicable legislation in order to prevent data loss, unlawful or improper use of the data and unauthorised access thereto. Furthermore, the information systems and computer programs used are configured so as to minimise the use of personal and identifying data; such data are processed only to achieve the specific purposes pursued from time to time. The Controller uses multiple advanced security technologies and procedures designed to enhance the protection of users' personal data; for example, personal data are stored on secure servers located in places with protected and controlled access.

10. RETENTION OF PERSONAL DATA

The personal data processed for the purposes referred to in sections 3.1 and 3.2 will be retained for the time strictly necessary to achieve those same purposes and in any case for a period not exceeding 10 years. Limited to contact data (mobile telephone number and/or e-mail address), once the contractual need that may require their processing has ceased, deletion may be requested, limiting retention to only the data necessary for the contractual obligations provided for by the Civil Code.

The personal data processed for the purposes referred to in section 3.4 will be processed until the user exercises the right to object to receiving e-mail communications based on legitimate interest.

With reference to the personal data referred to in section 3.5, processed for consent-based marketing purposes, they will be retained in compliance with the principle of proportionality and in any case until the purposes of the processing have been pursued or until the data subject exercises the right to withdraw consent.

The personal data processed for the purposes referred to in sections 3.3 and 3.6 will be retained until the time provided for by the specific applicable legal obligation or rule.

For the purposes referred to in section 3.7, your personal data will be processed until the purposes pursued are achieved or until the right to object is exercised, within the limits to which such right is exercisable in the context of legal action or judicial defence.

In any case, the Controller retains the possibility of storing your personal data for the period of time provided for and permitted by Italian law to protect its own interests (Article 2947(1)(3) of the Italian Civil Code).

A periodic annual review is envisaged of the data processed and of the possibility of deleting them if they are no longer necessary for the intended purposes.

Further information about the data retention period and the criteria used to determine that period may be requested by sending a written request to the contact details indicated in the "Contacts" section of this notice.

11. OPERATING METHODS AND LOGIC OF THE ARTIFICIAL-INTELLIGENCE SYSTEMS

In the use of the CAMELOT for Debate application, the Data Controller may make use of artificial-intelligence (AI) systems which fall within the category of Regulated Risks, given their use in the field of education, ensuring, where used, particular attention to the security of the data subjects' data.

We therefore inform you that the use of AI, where implemented, is aimed at supporting teachers in speeding up the assessment of the simulations carried out by the debaters in order to obtain a summary of the content simulated during the debates, so as to take the appropriate decisions and assessments in this regard, in line with Article 22 of the GDPR, which establishes the right of the data subject not to be subject to decisions based solely on automated processing which produce legal or significant effects on them.

To carry out such activities, a third-party large language model (LLM) will be used, accessible via a dedicated gateway, provided by Scaleway S.A.S. (8 rue de la Ville l'Évêque, 75008 Paris, France), on entirely European infrastructure (Paris, OPCORE data center). The models used are whisper-large-v3 for audio transcription and qwen3-235b-a22b-instruct-2507 for argumentative analysis and cognitive-bias detection. Scaleway guarantees high standards of privacy and security in compliance with the GDPR. CAMELOT also undertakes to apply additional security measures, such as, by way of example, the minimisation of the debaters' data (using pseudonyms) and carefully considers every regulatory and technical development in order to ensure ongoing compliance.

Finally, we inform you that the personal data will not be used to train artificial-intelligence algorithms (training). Scaleway applies zero data retention by default on the Generative APIs: data are not stored after processing, except for limited temporary technical retention in the event of service anomalies (e.g. HTTP 500 errors) for security purposes. Processing takes place entirely within the European Economic Area: no transfer of data outside the EU is necessary for the AI processing.

To receive more information about the operating methods and security measures adopted by the Company, you may contact it at the e-mail addresses indicated in the contacts section.

12. RIGHTS OF THE DATA SUBJECT

We remind you that at any time you have the right to know what personal data of yours we hold and the related ongoing processing, to request their updating or rectification and, in the cases provided for by the applicable legislation, to obtain their erasure, the restriction of processing or to object to their processing. If you wish, you may also receive your personal data in electronic format for the purpose of transferring them to a third party indicated by you. Where the processing is based on your explicit consent, you may withdraw such consent at any time.

At any time, by writing to the e-mail address privacy@camelot.vote you may exercise the rights recognised by the Regulation, with reference to the specific processing carried out by us:

- Request to access your personal data and to receive information about the purposes of processing, the categories of data processed, the recipients or categories of recipients to whom your personal data may be communicated, the envisaged retention period, and whether or not profiling mechanisms and automated decision-making processes are applied;
- Request to rectify your personal data. This right allows you to correct or complete the data concerning you, although in some cases a prior verification of the accuracy of the new data provided by you is necessary.
- Request to erase your personal data. This right allows you to request the erasure or removal of your personal data where there are no valid grounds for the continuation of the processing. You also have the right to request the erasure or removal of your personal data where you have exercised the right to object to processing and there are no other legal grounds allowing us to retain them, or where we have processed your



information in breach of the law, or where we are required to erase your personal data to comply with a specific legal provision. We point out that any erasure requests may not be able to be satisfied or may be satisfied only partially; this is due, for example, to legal, judicial or fiscal constraints, beyond our control, that prevent us from fully or partially erasing your personal data. The reasons for our inability, in whole or in part, to comply with your request will be promptly communicated to you.

- d) Request to object to the processing of your personal data. By exercising this right you may obtain the cessation of the processing of your personal data in relation to the purpose(s) indicated by you. We point out that our acceptance of your objection request may or may not occur on the basis of the lawfulness of the processing itself.

Where the processing is carried out on the basis of your explicit consent, we will, within the time limits provided for by the Regulation, comply with your request, ceasing the processing in question.

We remind you that you may withdraw any consent given for “marketing” and/or “profiling” purposes, including by writing to the e-mail account indicated above. The exercise of this right does not affect the lawfulness of the processing carried out before your withdrawal of consent.

We point out that the withdrawal of consent may result in our inability to continue providing certain services or products supplied by the site. In that case, we will take care to inform you of this at the time of withdrawal of consent in order to allow you to fully assess the effects of the withdrawal.

Where the processing is carried out on the basis of a legitimate interest, ours or that of third parties, we reserve the right to assess the reasons for your request. Where the grounds for the processing prove to be legitimately overriding with respect to your interests, rights and freedoms, or where it is necessary for us to process such data in order to initiate or pursue legal action or to defend ourselves in court, we will be obliged not to accept your request, giving the reasons for the refusal.

- e) Request to restrict the processing of personal data. This right allows you to request the suspension of the processing of your personal data in the following cases:

- where you ask us to verify the accuracy of your data.
- where you wish your data not to be erased, even though our use of the data is in breach of a rule.
- where you wish your data to be retained even if the reasons for our retention of them have ceased, because you intend to establish, exercise or defend a legally protected right.
- where you have objected to the use of your data but these are necessary for us to ascertain the existence of legal grounds for their use.

- f) Request to transfer your personal data to a third party. We will provide you or a third party indicated by you with your personal data in a structured, commonly used and machine-readable format. This will be done, where technically feasible, only for personal data whose processing is carried out by automated means and where the processing is based on Consent or on the performance of a contract.

When exercising the aforementioned rights, we reserve the right to ask you, in the ways we deem most appropriate, for specific information to help us confirm your identity, in order to be reasonably certain that only you can dispose of your personal data and that these are not disclosed to third parties not entitled to receive them.

We undertake to respond to and act upon your request, where well-founded, within one month of receipt of the request to exercise one or more rights. Occasionally, always in compliance with the time limits granted by the legislation, we may take longer where the request is particularly complex or where you have submitted numerous requests. In that case, we will take care to inform you, keeping you updated.

The exercise of your rights is entirely free of charge.

However, where your requests are manifestly unfounded or excessive, in particular due to their repetitive nature, we reserve

- the right to charge you a reasonable fee, based on the administrative costs incurred in providing you with the information or communication or in taking the requested action;
- to refuse to act on your request.

Finally, we remind you that at any time you may decide to lodge a complaint with the Supervisory Authority in the event of a breach of the personal-data-protection rules and/or where you believe that one or more of your rights have been infringed.

Such rights may be exercised by means of a simple written communication to be sent to the Data Controller, at the e-mail address: privacy@camelot.vote

You may also contact the Controller to receive further information or clarifications or to obtain an indication of the parties authorised to access your personal data.

The forms for exercising your rights are available at the following link:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

13. DATA CONTROLLER

CAMELOT SRL - SB, Tax Code 11925790963, having its registered office at Via Palestro 62, Ivrea (TO), in the person of the Legal Representative pro tempore.

Pursuant to Article 37 of the GDPR, given the current state of the processing carried out, it has not been necessary to designate a Data Protection Officer (DPO), as the activity and processing carried out do not fall within the conditions of mandatory designation provided for by the binding legislation.

14. CONTACTS

To exercise the above rights or for any other request, including those concerning the security of the Debate platform or relating to specific information about the Debate Room set up by the *Owner*, you may contact CAMELOT SRL - SB, Via Palestro 62, Ivrea (TO), e-mail privacy@camelot.vote even if the matter does not fall within our competence, we will forward it to the *Owner*, Data Controller.

15. AMENDMENTS

Following the development of our website and its offerings, or in the event of changes to legal or regulatory requirements, it may be necessary to amend this Personal Data Processing Notice. We therefore reserve the right to amend or simply update the content of the notice, in part or in full; the updated version will be available on the CAMELOT for Debate website.

Last amended on 23 June 2026.