

HST TRAINER - CW Training System (Morse Code)

INFORMATION ON THE PROCESSING OF PERSONAL DATA MINOR USERS

Document code: HST-INF-MINORI-001

Document version: 1.0

Issue date: 31 July 2026

1. Purpose of the document

This information notice describes how the personal data of minor users who use the HST Trainer System are processed.

This document supplements the "**Authorization Form for the processing of personal data and for the use of the HST Trainer System by minor users**" and aims to provide parents or persons exercising parental responsibility with all information relating to the management of personal data.

The objective is to ensure maximum transparency regarding:

- which data are collected;
 - the purposes for which they are used;
 - who can access the information;
 - how they are protected and stored.
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2. Description of the HST Trainer System

HST Trainer is a digital System dedicated to learning and training in CW telegraphy (Morse Code).

The System has exclusively educational and training purposes and allows users to:

- practice learning Morse Code;
- progressively improve their ability to receive and understand CW signals;
- perform personalized training sessions;
- consult their activity history and learning progress;
- participate in training activities organized by their group.

The HST Trainer System is not intended to collect unnecessary personal information and does not carry out commercial user profiling activities.

3. Data Controller

The Data Controller of personal data is:

Alessandro Corsini (IK5MEP)

Email:

ik5mep@libero.it

Website:

www.ik5mep.it

The Data Controller determines the purposes and methods of the processing of personal data carried out through the HST Trainer System.

The processing is carried out according to the following principles:

- lawfulness;
 - fairness;
 - transparency;
 - data minimization;
 - security and confidentiality.
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4. Personal data processed

For minor users, the HST Trainer System processes only the data necessary for the operation of the service.

The following data may be processed:

Minor's identification data

- name;
- surname;
- amateur radio callsign;
- group membership;
- group code.

Technical and educational data

- data relating to completed CW training sessions;
- exercise results;
- progress in the training path;
- personal System settings.

Contact data

- minor's email address, if available.

Where necessary for managing the relationship with the group, some data relating to the parent or legal guardian may also be processed:

- name and surname;
 - relationship with the minor;
 - email address;
 - telephone number voluntarily provided.
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5. Personal data that are not collected

The HST Trainer System applies the principle of personal data minimization, collecting only the information necessary for the operation of the service and for the educational purposes provided.

With regard to minor users, the System does not request and does not store:

- date of birth;
- residential address;
- minor's personal telephone number;
- identity document number or other personal documents;
- health information;
- information relating to family circumstances;
- economic or financial data;
- other information not necessary for carrying out educational activities.

The HST Trainer System does not collect personal data exceeding what is necessary for the declared purposes.

6. Purposes of personal data processing

The personal data of minor users are processed exclusively to ensure the proper functioning of the HST Trainer System and to carry out educational activities related to learning CW telegraphy.

In particular, data are used to:

- create and manage the user's personal account;
- allow access to the System;
- enable the performance of CW training exercises;
- record the history of educational activities;
- allow the visualization of personal progress;
- organize users into their respective groups;
- allow authorized managers to follow the educational path;
- ensure the correct technical operation of the platform.

The data of the parent or legal guardian are used exclusively for:

- verifying the presence of authorization for the minor's use of the System;
- necessary communications relating to the service;
- any urgent communications concerning the use of the platform;
- management of requests relating to personal data.

Personal data are not used for:

- advertising activities;
 - commercial communications;
 - user profiling;
 - purposes other than those indicated in this information notice.
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7. Legal basis for processing

The processing of personal data of minor users is carried out on the basis of:

- the consent provided by the parent or person exercising parental responsibility;
- the necessity to provide the requested service through the HST Trainer System;
- obligations arising from current personal data protection legislation.

The use of the System by the minor is subject to prior authorization by the parent or legal guardian through the signing of the relevant form.

8. Data processing methods and data security

The processing of personal data is carried out through IT tools and organizational procedures adopted to ensure the security, confidentiality and proper management of information.

The HST Trainer System adopts technical and organizational measures aimed at:

- preventing unauthorized access;
- protecting users' personal data;
- ensuring proper account management;
- limiting access to information according to the role assigned within the System.

Access to the System takes place through personal credentials and each user is authorized to access only the functions and information provided for their authorization level.

Personal credentials must not be shared with other parties.

9. Access to data and visibility of information

The visibility of information within the HST Trainer System is regulated according to the role assigned to the user and the authorizations provided by the System.

Access to personal data is limited exclusively to the information necessary for the educational, organizational and technical purposes of the service.

Minor user

The minor user, through their personal account, can access the information and functions provided for their profile within the HST Trainer System.

In particular, the minor user can view:

- their own personal data;
- their own training history;
- their own results and educational progress;
- graphs relating to their learning path;
- historical data and graphs of their group, made available by the System for educational and

learning comparison purposes.

The visualization of group-related information is limited to users belonging to the same working group. The System does not allow the minor user to access the personal data of users belonging to other groups. The minor user cannot independently modify their own identifying personal data. Any modifications are carried out by the Group Manager or authorized administrators according to the procedures provided by the HST Trainer System.

Members of the same working group

Users belonging to the same group can view only the information made available by the System for educational and organizational purposes.

The sharing of information within the group aims to encourage:

- educational comparison;
- personal motivation;
- progress monitoring;
- mutual support during the learning path.

Personal information that is not necessary for educational purposes is not made available.

Group Manager

The Group Manager can access the information necessary to:

- manage users belonging to the group;
- verify the educational path;
- support users in the use of the System;
- carry out any modifications requested by users or parents/legal guardians.

The Group Manager uses this information exclusively for educational and organizational purposes.

System Administrators

System administrators can access the information necessary for:

- technical maintenance of the platform;
- account management;
- System security;
- resolution of any technical issues.

Administrative access does not authorize the use of data for purposes other than those indicated in this information notice.

11. Data subject rights and methods for exercising them

As a data subject, or as a parent or person exercising parental responsibility for a minor user, it is possible to exercise the rights provided for by Regulation (EU) 2016/679 (GDPR).

In particular, it is possible to request:

- access to personal data, in order to know which information is processed by the HST Trainer System;
 - rectification of personal data, if incorrect or outdated information is present;
 - erasure of personal data, in the cases provided for by current legislation;
 - restriction of processing, where provided by legislation;
 - objection to processing, in permitted cases;
 - data portability, in the cases provided for by applicable legislation.
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Request methods

Requests relating to personal data can be submitted through one of the following methods:

- through the appropriate page available within the HST Trainer System in the **"My Profile"** section;
- through the Group Manager of the relevant group;
- by sending a direct request to the Data Controller at the email address:

ik5mep@libero.it

12. Withdrawal of consent

This section is included because it directly concerns the form signed by the parent/legal guardian.

The consent:

- can be withdrawn at any time;
 - withdrawal does not affect the lawfulness of processing carried out before the withdrawal;
 - withdrawal may result in the suspension or deletion of the minor's account, because the System cannot be used without a valid legal basis for processing.
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13. Storage of the authorization form

The signed form:

- remains in paper format and is stored by the Group Manager;
 - is not scanned;
 - is not uploaded to the platform;
 - is not registered in the HST Trainer database.
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14. Contacts

For any information relating to the processing of personal data, it is possible to contact:

Alessandro Corsini (IK5MEP)
Data Controller

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ik5mep@libero.it

Website:
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