# INFORMATION ON THE PROCESSING OF PERSONAL DATA of Clients of the Fondazione Museo delle Antichità Egizie di Torino

## in accordance with Article 13 of Regulation (EU) 2016/679

This information notice is given to individuals who are clients or act on behalf of clients of the Fondazione Museo delle Antichità Egizie di Torino (hereinafter FME), to individuals who access the museum premises in order to participate in institutional events promoted and organised by the FME and also to individuals who participate in private events promoted and organised by third parties that take place on the museum premises.

For the purposes of EU Regulation 2016/679 and national data protection legislation, you are informed that your personal data will be processed in such a way as to ensure adequate security and protection of your personal data, by means of appropriate technical and organisational measures, against loss, destruction, damage, or unlawful processing, and will be based on the principles of fairness, lawfulness, transparency and protection of your privacy and rights.

# 1. What data is processed

The personal data subject to processing are identification, administrative, accounting and tax data, contact data, bank data, data relating to services offered and payments received, directly related to the customer or, in the case of essentially identification and contact data, to interested parties such as collaborators, employees, contact persons, etc., and communicated by them in the execution and performance of relations with the data controller, data spontaneously provided contained in e-mail communications or contact requests via the website.

#### 2. Data controller

The Data Controller is the Fondazione Museo delle Antichità Egizie di Torino (hereinafter FME) with registered office in Turin, Via Accademia delle Scienze n. 6, IT-10123 (email PEC: fme.torino@pec.museoegizio.it , switchboard +39 011.561.7776)

## **Data Protection Officer:**

The Data Protection Officer (DPO) can be reached at the following address: Fondazione Museo delle Antichità Egizie di Torino: Via Accademia delle Scienze n. 6, IT-10123, Torino (To) email: dpo@museoegizio.it.

#### 3. Purpose of data processing

Your data will be processed by the Data Controller in a lawful manner to the extent that it is necessary for the following purposes:

- a) To fulfil pre-contractual, contractual and related obligations, such as preparing quotations, invoicing, delivery of goods and services, credit management;
- b) To draft the electronic invoice and transmission to the SDI

- c) To carry out accounting and administrative tasks, banking, including those aimed at obtaining financing, and credit recovery;
- d) To fulfil obligations required by law, by a regulation, for security reasons, Community legislation or by an order of the Authority, including the fulfilment of tax obligations;
- e) Subject to your consent, to send you commercial and/or promotional communications relating to products and services offered, and invitations to commercial events;
- f) To enable the Data Controller to assert or defend their rights in and out of court.
- g) To fulfil contractual obligations for the management of institutional events promoted by the Data Controller including the collection of participant lists for security purposes and the possible issuance of passes.
- h) To collect, for security purposes only, of the list of event participants for the management of events promoted by third parties and the possible issuing of passes.
- i) To collect navigation logs during the use of the Wi-Fi service by the event participant where applicable.

## 4. How your data is processed

The processing of data for the above-mentioned purposes is carried out by means of paper hard copy, automated or electronic, and transmission is by ordinary mail or email, telephone, text message, fax.

#### 5. The legal basis for processing your data

Your data will be lawfully processed on the following legal bases:

for the points listed in paragraph 3 a) g) and h): pre-contractual and contractual fulfilments

for the points listed in paragraph 3 b) and d): fulfilment of legal obligations

for the points listed in paragraph 3 c): legitimate interest of the Data Controller in keeping updated accounts and obtaining liquidity

for the points listed in paragraph 3 e) your express consent

for the points listed in paragraph 3 f): legitimate interest of the Data Controller in acting or defending itself in and out of court

#### 6. Consequences of non-disclosure of personal data

With regard to all personal data relating to the execution of the contract to which you are a party or relating to the fulfilment of a legal obligation (e.g. fulfilment of obligations related to the keeping of accounting and tax records), failure to provide personal data prevents the completion of the contractual relationship itself.

#### 7. Who are the recipients of your personal data

Your personal data is processed within the company structure for the purposes indicated above, by authorised data processors, and may also be communicated to external parties working on behalf of the Data Controller who perform certain technical and organisational activities on its behalf, such as suppliers of administrative, banking, accounting and tax or IT services, security, e-mail operators,

etc. These subjects, in the cases envisaged by the European Regulation, will be appointed by the Data Controller as Data Processors pursuant to Article 28 of the GDPR.

This is, however, without prejudice to all cases in which the communication of data is prescribed by law, such as the transmission of electronic invoices to the Inland Revenue.

Your data will not be transferred to any recipient in a third party country or to an international organisation outside the European Union (EU) or the European Economic Area (EEA), but the Data Controller reserves the right to use cloud services operated on servers located in a third party country for data processing, in which case the service providers will be selected to provide adequate data protection guarantees.

#### 8. Data Retention Period

The data processed by the data controller will be kept for a period of time not exceeding the purposes for which they are processed, in accordance with criteria based on compliance with the rules in force and on fairness and a balance between the legitimate interests of the Data Controller and the rights and freedoms of the data subject. Consequently:

- Data provided by you in connection with simple business contacts and requests for quotations will be kept only for the period of validity of the quotation that may be provided and in any case for no longer than six months.
- With reference to data relating to contract management, data contained in tax documents, data relating to accounting and tax management and data relating to the legal management of collections, the retention period is 10 years
- -Identification data of the user, or data referring to the user's collaborators, employees and contact persons that are collected for security purposes for the allocation of the access pass are retained for one year after the end of the service
- Logs of navigation via the Wi-Fi service provided in the conference room and for event management are retained for 1 month.

At the end of the above-mentioned periods, your data will be deleted; therefore, the right of access, deletion, rectification and the right to portability can no longer be exercised.

This is without prejudice to cases in which rights arising from the contract are to be asserted out of court and/or in court, in which case the personal data of the Data Subject, only those necessary for such purposes, will be processed for the time necessary for their pursuit.

#### 9. Rights of the data subject

The Privacy Regulation confers on you the right to exercise specific rights, where exercisable, including the right to request the Data Controller:

- Access to your personal data (right of access)
- The rectification of inaccurate personal data or the integration of incomplete data (right of rectification)

- The deletion of personal data processed within the limits of the regulation and the laws in force (right to be forgotten)
- The restriction of processing in the cases provided for by the regulation (right to restriction)
- To receive personal data in a structured, commonly used and machine-readable format and to transmit them to another data controller (right to portability)

You also have the right to object to processing for marketing and profiling purposes (right of objection) and the right to withdraw your consent at any time and as easily as you have given it. Withdrawal of consent does not affect the lawfulness of the processing based on the consent before withdrawal.

We also inform you that there are no automated decision-making processes affecting your data, including profiling. The appropriate application to the FME is made by contacting the Data Protection Officer at the FME (Fondazione Museo delle Antichità Egizie di Torino: Via Accademia delle Scienze n. 6, IT-10123, Torino (To) email: <a href="mailto:privacy@museoegizio.it">privacy@museoegizio.it</a>).

#### 10. Right to complain

Data subjects who consider that the processing of personal data relating to them carried out through this website is in breach of the provisions of the Regulation have the right to lodge a complaint with the supervisory authority, as provided for in Article 77 of the Regulation itself, or to take legal action (Article 79 of the Regulation).