

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

**in accordance with Art. 13 of Regulation (EU) 2016/679**

This disclosure is provided to natural persons taking part in events organised and/or managed by the Fondazione Museo delle Antichità Egizie di Torino (hereinafter, "FME") and to visitors to the exhibitions of the Museo Egizio di Torino (hereinafter, "Clients") or those working on behalf of FME.

For the purposes set out in Regulation (EU) 2016/679 and in Italian legislation on the protection of personal data, we hereby inform you that your personal data will be processed in such a way as to guarantee adequate security and protection thereof, taking appropriate technical and organisational measures against loss, destruction, damage or unlawful processing and will be based on principles of propriety, lawfulness, transparency and protection of your privacy and rights.

**1. Data processed**

The personal data processed relate to identification, administration, accounting and taxation, personal and bank details, data relating to services offered and payments received, directly referring to clients, or for data essentially for identification and contact purposes, to data subjects such as collaborators, employees, contact persons, etc., provided thereby in the implementation and performance of relations with the data controller, such data having been spontaneously provided contained in e-mail communications or contact requests via the website and/or images.

**2. Data Controller**

The Data Controller is Fondazione Museo delle Antichità Egizie di Torino (hereinafter "FME") with its registered office in Turin at Via Accademia delle Scienze, 6 – IT-10123 (certified e-mail: [fme.torino@pec.museoegizio.it](mailto:fme.torino@pec.museoegizio.it), switchboard +39 011 561 7776)

**Data Protection Officer:**

The Data Protection Officer (DPO) can be contacted at the following address: Fondazione Museo delle Antichità Egizie di Torino: Via Accademia delle Scienze, 6 – IT-10123 Turin (TO) – Italy; e-mail: [dpo@museoegizio.it](mailto:dpo@museoegizio.it)

**3. Purpose of processing your data**

Your data will be processed lawfully, to the extent necessary, for the following purposes:

- a) To fulfil pre-contractual, contractual and related obligations, such as the drafting of estimates, registrations, invoicing, delivery of goods and services, credit management;
- b) Subject to the consent thereof, to take photographs, videos and/or interviews, for the purpose of historical archiving to document cultural and scientific dissemination and share public impressions of the events organised;
- c) To meet accounting, administrative and banking requirements, including for the purposes of financing and credit recovery;
- d) To comply with obligations under the law, regulations, for security reasons, EU legislation or by order of the authorities, including the fulfilment of the tax obligations pertaining thereto;
- e) Subject to your consent, to send you commercial and/or promotional communications regarding the products and services offered and/or invitations to commercial events;
- f) To enable the data controller to assert or defend its rights in and out of court
- g) To fulfil contractual obligations for the management of institutional events promoted by the controller, including the drafting of lists of participants for security purposes and any issuance of passes.
- h) The collection, for security purposes only, of the list of participants in the event for the management of events promoted by third parties and any issuance of passes.
- i) The collection of browsing logs during the use of the Wi-Fi service by participants in the event or the visit where applicable.

**4. How your data are processed**

The processing of the data for the purposes set out above will take place on paper or by automated or electronic means; the said data will be transmitted by ordinary post or e-mail, telephone, SMS or fax.

**5. Legal basis for processing your data**

Your data will be processed lawfully on the following legal bases:  
for the points listed in sections 3a), 3g) and 3h): pre-contractual and contractual obligations relating to the points listed in section 3d): compliance with legal obligations

for the points listed in section 3c): the legitimate interest of the data controller in keeping up-to-date accounts and obtaining liquidity

for the points listed in sections 3b) and 3e): your express consent

for the points listed in section 3f): legitimate interest of the data controller to act or defend itself in and out of court

## **6. Consequences of failure to provide personal data**

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

## **7. Recipients of your personal data**

Your personal data are processed within the company structure for the purposes indicated above, by authorised data processors, and may also be communicated to third parties operating on behalf of the data controller who, on the behalf thereof, carry out certain technical and organisational activities, such as sponsors, suppliers of administrative, banking, accounting and tax or IT services, e-mail managers, etc. The said entities, as provided for by the EU Regulation, will be appointed by the data controller as data processors in accordance with Art. 28 of the GDPR.

Without prejudice, nevertheless, to any cases in which the communication of data is required by law, such as the transmission of an electronic invoice to the Italian Revenue Agency.

Your data will not be transferred to a recipient in a third 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 managed on servers located in a third country for data processing, in which case the service providers will be selected in such a way as to provide adequate guarantees regarding data protection.

## **8. Retention period**

The data processed by the controller will be retained for no longer than the period required to fulfil the purposes for which the said data are processed according to criteria based on compliance with current regulations and propriety and balance between the legitimate interest of the data controller and the rights and liberties of the data subject. As a result:

- the data you provide in relation to simple commercial contacts and requests for quotations will be retained only for the period of validity of any quotation provided and in any case for no longer than six months.
- with reference to the data relating to the management of the contract, those contained in the tax documents, the data relating to accounting and tax management and those relating to the legal management of collections, the retention period is ten (10) years
- Client identification data, or those referring to collaborators, employees and contact persons thereof as collected for security purposes for the assignment of access passes, will be retained for one year from the end of the provision of the service
- browsing logs via the Wi-Fi service provided in the conference room and for event management will be retained for one (1) month.
- Photos, videos and interviews will become part of FME's historical data records.

At the end of the said periods, your data will be deleted, making it impossible to exercise the rights of access, deletion, rectification and the right to portability.

Without prejudice to cases in which the rights deriving from the contract are asserted out of court and/or in court, in which case the personal data of the Data Subject, limited to those required for the said purposes, will be processed for the time needed to pursue the above.

## **9. Rights of the Data Subject**

The Privacy Regulation entitles you to exercise specific rights, where they can be exercised, which include the right to ask the Data Controllers:

- for access to your personal data (right of access)
- to rectify inaccurate personal data or supplement incomplete data (right to rectification)
- to delete the personal data processed within the limits set by the Regulation and the laws in force (right to erasure)
- to restrict the processing in the cases stated in the Regulation (right to restriction)
- to receive the personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller (right to portability)
- You are entitled to object to processing for marketing and profiling purposes (right to object)
- The right to withdraw your consent at any time as easily as you have given it. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. Requests may be made at any time in writing, to be sent by ordinary post or email and will be fulfilled according to the right to remove and/or delete data subject to dissemination, having also evaluated feasibility in both technical and cost terms (e.g. for images and video footage previously disseminated).

You are hereby further informed that there are no automated decision-making processes relating to your data, including profiling. The appropriate request to FME must be made by contacting the Data Protection Officer at FME (Fondazione Museo delle Antichità Egizie di Torino – Via Accademia delle Scienze, 6 – IT-10123 Turin (TO) – Italy; e-mail: [privacy@museoegizio.it](mailto:privacy@museoegizio.it)).

#### **10 Right to complain**

Data subjects who deem that their personal data is being processed by this site in breach of the provisions of the Regulation are entitled to lodge a complaint with the supervisory authority, as provided for by Art. 77 of the said Regulation, or to bring the matter before the relevant courts (Art. 79 of the Regulation).