

PRIVACY POLICY (extended)

pursuant to Article 13 of the GDPR

Promotional photos and videos

Why this document is important

1.0

This document is of interest to you because it informs you how and why we process your personal data (🔥)

!! Important

When there is this symbol (🔥), you will find the definition of the word above in the Essential Glossary at the bottom!

This notice only concerns processing carried out for the purposes specified below (→ 📄 **Why we process your data**).

This information does not replace any specific information that will be given to you when you use other services of the Controller.

This document may be updated over time: check back regularly!

Data controller (🔥)

1.0

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What are your rights

1.0

In the cases provided for by law, you have the right to **access your data**, to ask for them to be **corrected and deleted**; you also have the right to **object to the processing** of your data or to **ask for the processing to be restricted**; and you have the right to the **portability of your data**. Furthermore, you have the right to **revoke the consent** given to the Controller at **any time**, without affecting the lawfulness of the processing based on the consent given before revocation.

In any case, if you have any doubts or requests, please contact us (   ), we will be happy to hear from you!

!! Important

You as the Data Subject (🔥) may **exercise your rights** and **withdraw your consent** by notifying us at the contact details indicated.

In addition, you can lodge a **complaint with the Data Protection Authority** or **go to court** if you believe that the processing of your data is against the law.

Why we may process your data (legal bases)


1.0


Any processing of personal data must have an appropriate legal basis.


!! Important



Treatment is lawful when:

 **contract**: necessary to perform a contract to which the data subject is a party or pre-contractual measures requested by the data subject

 **consent**: the data subject freely, specifically informed and unequivocally manifests his/her consent

 **legal obligation**: necessary to fulfil a legal obligation to which the Controller is subject

 **legitimate interest**: necessary to pursue the legitimate interest of the Controller or of third parties


 **protection of vital interests:** it is carried out to preserve serious and present dangers to the life of the data subject
 **public interest:** necessary to perform a task in the public interest or for the exercise of public authority

Why we process your data (purpose)

Promotional photos and videos

1.0

If the interested party agrees, the Data Controller will process his image and audio recordings: he collects, also through delegated third parties, the image at events and other initiatives, also to take promotional photos and videos of his own activity, which he disseminates on social networks, websites and through any other means of communication he makes use of, with the widest possible faculty of adaptation and/or modification and editing that may be necessary and/or appropriate, also pursuant to copyright law (art. 96 L.633/1941: "The portrait of a person may not be exhibited, reproduced or marketed without the consent of that person"). For this purpose, the Data Controller may also process special data.

Legal basis:  consent

Important

Consent is required for this purpose. You may revoke your consent to data processing at any time by notifying us (opt-out). If consent is not given or is subsequently revoked, it will not be possible to carry out activities and any related services.

The Data Controller will do its best to protect your choice, but your cooperation is essential: if you deny your consent, the Data Controller may ask you to follow specific instructions (e.g., only sit in a certain area, close the webcam, wear an identification item, do not ask questions or intervene, etc.).

It is also possible to give consent at any time: thus, if a data subject has initially indicated that he or she does not wish to give consent for this purpose but then engages in conduct that manifests the change of mind (e.g. voluntarily goes up to the photographer to take part in a group photo or asks a question into the microphone), that conduct freely, specifically informed and unequivocally gives consent to the processing.

Legitimate interest

1.0

Data subjects' data often also have to be processed in order to perform tasks that are related to the company's activities, but which are not mandatory by law or by virtue of the contract between the parties. This refers in particular to actions aimed at protecting the company's assets; verifying the quality of the work carried out by the company; verifying regulatory compliance; preventing fraud; direct marketing; transferring intra-group data for administrative purposes; recovering company debts; managing any litigation; exercising or defending rights in or before litigation.

Legal basis:  legitimate interest




Important

We never process your data on the basis of legitimate interest if this may affect your rights and freedoms!

Obligations connected with what we do

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The Data Controller processes the data in order to perform activities connected with and instrumental to the performance of the contractual or pre-contractual relationship with third parties (e.g.: administrative, managerial, tax and accounting fulfilments; managing correspondence; making estimates; receiving orders; agreeing appointments; informing on the status of the activity; managing payments and invoicing).

Legal basis:  contract |  legal obligation |  legitimate interest

Important

Communication of data for this purpose is indispensable.

Processing for this purpose is carried out on the legal basis of legitimate interest and legal obligation, so your consent is not required.

Respect the law

1.0

The Data Controller also processes the personal data of Data Subjects in order to comply with legal obligations (such as administrative, accounting and tax obligations) to which it is subject, to protect its rights, and to enable the exercise of the functions of judicial authorities.

Legal basis:  legal obligation

!! Important

Communication of data for this purpose is indispensable.

Processing for this purpose is carried out on the legal basis of a legal obligation, so your consent is not required.

What data do we process

1.0

Personal Data

1.0

We process personal data, i.e., all information concerning an identified or identifiable natural person.

!! Important

Your data is valuable: do not communicate any data that is not necessary for the request you make to us and do not communicate any data of third parties unless you have their consent to do so!

We may also learn about your particular data that you voluntarily share with us (such as: health, genetic or biometric data; trade union membership; political opinions; philosophical or religious beliefs; ethnic or racial origin; sexual life and sexual orientation).

 Examples of personal data we process:

- **identification data and contact details:** first name and surname; tax code; place and date of birth; nicknames; telephone number, e-mail, residence, domicile, head office; user name and password to access the systems that the Data Controller makes available to the Data Subject (corporate devices; e-commerce and reserved areas; websites and apps)
- **employment data:** employer; characteristics of the employment relationship (start, classification, job title, level, type of hours, etc.); wages paid or received, contributions paid or received; training and certifications; suitability for the job and any limitations
- **personal image** of the person concerned
- **voice** of the interested party

Where we get your data (sources)

1.0





We process data that you share with us directly (optionally, explicitly and voluntarily) using various channels (such as when you call or write to us, when you interact with our social profiles or when you use our website or app) and data that you have made public.


We also process data from public registers, lists and other public sources (e.g. balance sheets and other information from the Companies Register at the Chambers of Commerce; real estate deeds, registration of mortgages and other so-called prejudicial deeds; mass media and websites accessible to anyone).


With whom we share your data

1.0

We share data with internal members of our organisation involved by reason of their assigned tasks and specifically entrusted with the processing (such as: employees and para-employees; interns, volunteers, temporary workers; partners, investors, directors; consultants and collaborators).

We may share data with third parties, outside our organisation, who help us do our work and achieve the stated purposes. These parties operate as autonomous data controllers or as external data processors: contact us (   ) if you want to know who they are!

With the consent of the data subject, the data may be disseminated (.

 Examples of data recipients

- Public Administrations, Public Bodies and subjects, including private ones, with functions of public relevance (such as Municipalities, ASL, INAIL, INPS, Guardia di Finanza, Supervisory Authorities, Revenue Agency, Judicial Authorities, etc.), to the extent that the prerequisites set out in the legislation are met
- external consultants and professionals (such as lawyers, accountants, labour consultants and data processing centres, DPOs, RSPPs, freelancers, journalists, coaches)
- social networks and other digital platforms (such as systems to manage video conferences or file exchange)
- parties managing the operation of the website, app and in general of the company's IT systems and telecommunications networks (e.g.: web agencies; providers of cookies and other tracking tools; newsletter providers; software houses; web providers; hosting providers)
- photographers, cameramen, photo and/or video editors
- couriers, carriers and other entities performing delivery services for communications or products, and related activities

How long we keep your data

1.0

We retain data until consent is revoked (opt-out) or in any case until the stated purposes are fulfilled.


Longer only if it serves to comply with legal obligations, fulfil orders given by public authorities, or pursue a legitimate interest (such as exercising or defending a right in litigation)

Important

If your consent is required (e.g. for marketing purposes), we will process your data as long as you agree. Indeed, you can withdraw your consent to data processing at any time by notifying us (**opt-out**), but in that case we may no longer be able to provide you with certain activities and/or services.

How we process your data

1.0




We take the appropriate security measures to protect your data and carry out the processing () required by law: collection, registration, organisation, storage, consultation, processing, use, modification, selection, extraction, restriction, communication, deletion and destruction of data.

Essential glossary

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- Personal data:** any information concerning an identified or identifiable natural person)
- Dissemination:** giving knowledge of the data to unspecified persons, in any form, including by making them available or consulting them. E.g.: publishing a photo online or on a social network
- DPO:** Data Protection Officer, whose functions also include acting as intermediary between Data Controller and Data Subject)
- Data subject:** natural person to whom the personal data refer)
- Data controller:** who determines the purposes and means of processing)
- Processing:** any operation or set of operations carried out with or without the help of automated processes and applied to personal data or sets of personal data)

Notes

Done by Owner with  **StudioFLEX - labour lawyers** ( www.studioflex.it,  gdpr@studioflex.it)