

Privacy policy “newsletter”



1. Data controller

Storti S.p.A., with registered office in Via Francesco Dioli, 11, 26045 Motta Baluffi (CR), Tax ID and VAT 00765230198, hereinafter referred to as “Data Controller”, guarantees compliance with personal data protection regulations by providing the following information on the processing of data pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation - GDPR) as amended.



2. Data processed, purpose and legal basis for processing

The personal data voluntarily provided by the user are collected, via the newsletter platform, and processed for the following purposes:

- a) in the presence of specific consent, so that the user may receive by mail, telephone, e-mail, text message or messaging app communications relating to the Controller’s cultural activities, invitations to events as well as updates on our activities and reports on publications;
- b) with specific consent, so that the user may to receive by mail, telephone, e-mail, text message or messaging app invitations to participate in statistical analyses.

For the sake of full information, we would like to point out that in sending out communications, the Data Controller uses the MailUp newsletter sending platform which, by means of statistical tracking systems (e.g. web beacons, pixels, etc.), makes it possible to detect the opening of a message, the clicks made on the hyperlinks contained within the e-mail, from which IP address or with which type of browser the e-mail is opened, and other similar details.

The collection of such data is instrumental for the use of the platform and forms an integral part of the functionality of the message delivery system.

You can find information about the data use and GDPR compliance of the MailUp newsletter sending platform [here](#).

The legal basis legitimising the processing of such data with respect to the stated purposes is the consent of the data subject.



3. Nature of the provision

The provision of data with respect to the purposes set out in point 2 is optional and their use is conditional on explicit consent.

Any refusal will make it impossible for the Controller to send newsletters and advertising material or invitations to events and initiatives of the Controller.



4. Locations and methods of data processing and storage times

The data collected by the website are processed at the Data Controller's registered office, and at the data centres of the MailUp newsletter sending platform regularly referred to as Data Processor, as well as at the premises of third parties, also appointed Data Processors, or, as the case may be, of all subjects necessary for the proper fulfilment of the purposes set out in point 2.

For the sake of completeness, we would like to inform you that you can find information regarding data use and GDPR compliance of the MailUp newsletter sending platform [here](#).

The data collected shall be processed by electronic means or otherwise automated, computerised and telematic tools, or by means of manual processing with logic strictly related to the purposes which the personal data were collected for and, however, in such a way as to guarantee their security.

The data are stored for the time strictly necessary to manage the purposes for which the data are processed ("principle of storage limitation", Art.5, EU Regulation 2016/679), namely until revocation of the consent or in compliance with the deadlines set forth by current regulations and legal obligations.



5. Persons authorised to process, data processors and communication of data

The processing of the data collected is carried out by the Data Controller's own personnel, identified for this purpose and authorised to process them in accordance with specific instructions given in compliance with the applicable regulations.

The data collected, within the limits pertinent to the purposes of processing indicated and where necessary or instrumental to the execution of the purposes themselves, may be processed by third parties appointed as external data processors, or, as the case may be, communicated thereto as autonomous data controllers, namely companies, bodies, associations that perform services connected and instrumental to the execution of the purposes indicated above (e.g. market analysis and research service, marketing consultancy, etc.).

The data collected may be provided in the event of a legitimate request by the Judicial Authority, solely in

the cases provided for by law.

Under no circumstances and for no reason whatsoever shall your data be disseminated.



6. Data transfer to non-EU countries

The data may be transferred abroad to non-European countries, and in particular to the United States, only after verifying the Standard Contractual Clauses adopted/approved by the European Commission pursuant to Art. 46, para. 2 letters c) and d) of the GDPR or the binding rules for the company referred to in Art. 47 of the GDPR or, failing that, by virtue of one of the derogatory measures referred to in Art. 49 of the GDPR.

Transfer to the United States is authorised under the specific agreement called the EU-US Data Privacy Framework (available [here](#)), so no further consent is required.



7. Rights of the data subject

In relation to the Personal Data provided, the data subject has the right to exercise the following rights:

- a. (Art. 7.3 EU Regulation 679/2016 - GDPR) withdrawal of consent;
- b. (Art. 15 EU Regulation 679/2016 - GDPR) access and obtain a copy;
- c. (Art. 16 EU Regulation 679/2016 - GDPR) request rectification;
- d. (Art. 17 EU Regulation 679/2016 - GDPR) request erasure ('right to be forgotten');
- e. (Art. 18 EU Regulation 679/2016 - GDPR) obtain restriction of processing;
- f. (Art. 20 EU Regulation 679/2016 - GDPR) receive them in a structured, commonly used and machine-readable format for the purpose of exercising the right to portability;
- g. (Art. 21 EU Regulation 679/2016 - GDPR) object to the processing.

The data subject may exercise his/her rights, as well as request further information regarding his/her Personal Data, by sending an e-mail to privacy@storti.it specifying in the subject line the content of his/her request.

Requests relating to the exercise of the user's rights shall be processed without undue delay and, however, within one month of the request; only in cases of particular complexity and number of requests may this period be extended by a further two (2) months.

We would like to remind you that it is your right (pursuant to Art. 77 EU Regulation 679/2016 - GDPR) to file a complaint with the Data Protection Authority, whose contact details are available [here](#).

Last updated: 20 February 2024