# Policy Statement on the Processing of Personal Data pursuant to Art. 13 of European Regulation 2016/679 (so-called "GDPR")

# **Data Controller**

Quousque Tandem s.r.l.s. (hereafter, for the sake of brevity, also "Data Controller") in the person of its legal representative, with registered office in Milan, via P.Sottocorno n. 5/A, cap. 20129, VAT number and tax code IT12034820964.

# Type of data collected

The Data Controller collects the personal data of those who intend to apply for the development of the project as 'editors', 'experts', 'managers' or 'translators'. Specifically, in the format available on the website www.snaphistory.io, candidates must communicate the following personal data

- first name, surname
- email address, telephone number;
- educational background and/or profession;

On the site, under the heading 'Support the project', it is possible to contribute to the financial support of the initiative. Personal data (name, email, etc. with the exception of credit card data) of donations made via the PayPal platform are collected by PayPal and are visible only within your PayPal account.

## **Purpose of Processing**

Personal data and any changes communicated to Quousque Tandem s.r.l.s. will be collected and processed to fulfil the obligations arising from the collaboration for the "Snap History" project; in particular, these are necessary for the following activities

- administrative and, if necessary, accounting and tax management;
- implementing and executing existing contracts and/or managing the collaboration relationship;
- fulfilment of legal obligations;
- management and processing of correspondence.

# The data collected will not be processed for marketing purposes, nor will users be subject to any profiling activities.

## Methods of data collection

Processing is limited to the following operations and in the following ways

- collection of the data provided by the data subject in filling in the online format (www.snaphistory.io) when applying to be an 'editor', 'expert', 'manager' or 'translator';
- if necessary, collection of data from public registers, lists, deeds or documents that can be accessed by anyone and directly by the data subject.

## Storage methodology

- mainly in computer-based
- on paper, limited to the administrative-accounting aspect where such activity is required.

## Categories of recipients to whom the data have been or will be communicated

The data may be communicated to:

- all subjects whose right to access your personal data is recognised by legal provisions;
- the collaborators and employees of Quousque Tandem s.r.l.s, within the scope of their assigned tasks;
- companies or other third parties who, on behalf of Quousque Tandem s.r.l.s, provide specific

services that are instrumental to or supportive of the activity;

- any consultants or professionals to whom it may be necessary to communicate the data for the management of part of the processing in accordance with the stated purposes and in compliance with legal obligations.
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## Storage period

The data will be managed for:

- the entire duration of the collaboration relationship with Quousque Tandem s.r.l.s;
- even afterwards, for the fulfilment of legal obligations.

The Data Controller will therefore retain the data for the time necessary to fulfil the aforementioned purposes, with a ten-year term for the purpose of fulfilling legal obligations and for legal protection purposes.

Should the application not be accepted or should the relationship be terminated, the personal data will be subject to the deletion procedure within 180 days of being shared.

## Security measures

Data processing is conducted by means of:

- the use of suitable security measures to prevent unauthorised access to the data by third parties. To this end, Quousque Tandem s.r.l.s. uses
  - i) qualified personnel in charge of processing

ii) assistance from an external IT consultant who has been asked to adopt effective security measures;

(iii) access-controlled premises for data stored on paper;

• the use of suitable internal tools and procedures to ensure security, confidentiality and compliance with regulations in accordance with the provisions of the Privacy Code and EU Regulation 2017/679 (GDPR).

# Data transfer abroad

The data subject's personal data will not be transferred to non-European countries.

# **Rights of the interested party**

In addition to the right to lodge a complaint with a supervisory authority, the data subject also has the rights listed below, which he/she may assert by sending a written request by registered mail with return receipt to the data controller:

## **Rights of the interested party**

In addition to the right to lodge a complaint with a supervisory authority, the interested party also has the rights listed below, which he/she may assert by sending a written request by registered mail with return receipt to the data controller:

*Art. 15-Right of access*: the interested party has the right to obtain from the data controller confirmation as to whether or not personal data concerning him/her are being processed and, if so, to obtain access to the personal data and information concerning the processing.

*Art. 16 - Right of rectification:* the interested party has the right to obtain from the data controller the rectification of inaccurate personal data concerning him without undue delay. Bearing in mind the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, including by providing a supplementary declaration.

*Art. 17 - Right to erasure (right to be forgotten)*: the interested party has the right to obtain from the data controller the erasure of personal data concerning him without undue delay, and the controller has the obligation to erase the personal data without undue delay.

*Art. 18 - Right to restriction of processing*: the interested party has the right to obtain from the data controller the restriction of processing when one of the following cases occurs

a) the interested party contests the accuracy of the personal data, for the period necessary for the controller to verify the accuracy of the personal data

(b) the processing is unlawful and the data subject objects to the erasure of the personal data and requests instead that their use be restricted

(c) although the controller no longer needs the personal data for processing purposes, the personal data are necessary for the establishment, exercise or defence of legal claims by the data subject

(d) the interested party has objected to the processing pursuant to Article 21(1), pending verification as to whether the legitimate reasons of the controller prevail over those of the data subject.

*Article 20 - Right to data portability*: interested party has the right to receive in a structured, commonly used and machine-readable format personal data concerning them that they have provided to a data controller and they have the right to transmit those data to another data controller without hindrance from the data controller to whom they have provided them.

When exercising his/her rights in relation to the portability of data pursuant to paragraph 1, the data subject shall have the right to obtain the direct transmission of personal data from one controller to another, if technically feasible.

Art. 21 - Right to object: the interested party has the right to object at any time, on grounds relating to his or her particular situation, to the processing of personal data relating to him or her pursuant to Article 6(1)(e) or (f), including profiling on the basis of these provisions.

*Art. 22 - Right not to be subject to automated decision-making, including profiling*: the data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or significantly affects him in a similar way.

In order to exercise the rights summarised above, the person must send a formal written request addressed to: Quousque Tandem s.r.l.s. at the Pec address snaphistory@pec.it