



Privacy Policy

ARCS Archi Culture Solidali APS

Prepared: December 2018

Last update: November 2020

Dear Data Subject,

We are writing to inform you that the Data Controller, as indicated below, would like to explain why it collects and processes your personal data, which kinds of data are processed, what your rights are under the rules on personal data protection and how you can exercise these rights.

The Data Controller of your personal data is ARCS Arci Culture Solidali APS, which is liable to you for the lawful and fair use of your personal data.

For any information or requests, you may contact them at:

ARCS Arci Culture Solidali APS

Legal seat Via dei monti di Pietralata, 16 - 00157 Roma, Italia

Tel 06 41609501

e-mail segreteria_arcs@arci.it

Certified email arcs@mypec.eu

Your personal data are collected and processed for the purposes given below, including the type of data processed and the reason legitimising their processing (legal basis).

Purpose	Data processed	Legal basis
To send informative and/or promotional material also by telephone or Internet	Name, address or other forms of personal identification; Health cards; Email address; Bank details	Processing is necessary to pursue the legitimate interest of the Data Controller or of third parties, Art. 6, para. 1, letter f), EU Reg. 2016/679.
Accounting, documentation and reporting of donations received	Tax code and personal identification numbers; Name, address or other forms of personal identification; Bank details	Processing is necessary for the performance of a contract to which the data subject is a party or for the performance of pre-contractual measures adopted at the request of the data subject, Art. 6, para. 1, letter b), EU Reg. 2016/679.
Act as a payment proxy where authorised by supporters of ARCS' initiatives	Tax code and personal identification numbers; Name, address or other forms of personal identification; Bank details	Processing is necessary for the performance of a contract to which the data subject is a party or for the performance of pre-contractual measures adopted at the request of the data

		subject, Art. 6, para. 1, letter b), EU Reg. 2016/679.
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Providing the Data processed to manage your contractual relationship (Donations) is mandatory, because it is necessary to fulfil the related obligations. Refusal to provide data for these purposes will make it impossible for the Data Controller to follow up on the contract and perform the activities necessary to achieve the purposes.

The Data Controller may process Your Data in order to send information about the organisation's projects and activities and the status of their progress and implementation. The Data Controller will do so in compliance with the principles of the GDPR and to pursue its own legitimate interest. In any case, you may refuse to receive such information at any time by contacting the Data Controller at the addresses and telephone number given above.

Your data may be sent to the recipients or to the groups of recipients given below:

Individual or associations of consultants and self-employed professionals, Institutional bodies, other institutions of the public administration, public economic institutions, Associations and foundations, public institutions, other offices of the organisation.

The Data Controller may communicate some of Your Data to subjects it employs to perform the activities necessary to achieve the purposes mentioned and described above

(subjects with which the Data Controller itself has entered into contract in order to assist and maintain information systems and management software). The subjects mentioned above that process Your Data on behalf of the Data Controller have been specifically appointed by the Data Controller as Data Processors.

You may contact the Data Controller to request a list of the Data Processors at the following e-mail addresses and telephone number:

ARCS Arci Culture Solidali APS

Legal seat Via dei monti di Pietralata, 16 - 00157 Roma, Italia

Tel 06 41609501

e-mail segreteria_arcs@arci.it

Certified e-mail arcs@mypec.eu

The Data relating to you will be processed by the Data Controller only for the time necessary to achieve the above-mentioned purposes.

In particular, in order to ensure that your data are processed in the most fair and transparent manner possible, you should be aware of the following regarding the duration of processing:

- Personal and/or sensitive data will be stored for statutory, accounting and tax purposes, as well as to exercise the Data Controller's right of defence against legal claims, for no fewer than 10 years starting from the end of the data subject's relationship with the organisation, unless a different retention period is required by law (Law no. 49/1987 and subsequent amendments, New Regulations Regarding Italy's

Cooperation with Developing Countries) to fulfil the obligations associated with the activities of NGOs.

Your data may be subject to automated processing that does not profile data subjects and non-automated processing (paper archives) using methods and instruments that ensure data security. While the Data Controller is in possession of or is processing Your Data, you, as the data subject, may exercise the rights given below at any time:

- **Right of access** – You have the right to obtain confirmation as to whether or not Your Data are being processed as well as the right to receive all information relating to such processing;
- **Right to rectification** – You have the right to have Your Data in our possession rectified, if they are incomplete or inaccurate;
- **Right to erasure** (“right to be forgotten”) – Under certain circumstances, you have the right to erase Your Data in our archives if it is not necessary to continue the contractual relationship or required by law;
- **Right to restrict processing** – Subject to certain conditions, you have the right to restrict the processing of Your Data if it is not necessary to continue the contractual relationship or required by law;
- **Right to data portability** – You have the right to transmit Your Data in our possession to another data controller;
- **Right to object** – You have the right to object, at any time for reasons relating to your specific situation, to the processing of Your Data based on the lawful

condition of a legitimate interest or to perform a task in the public interest or to exercise public powers, including profiling, except where there are legitimate reasons for the Data Controller to continue processing that prevail over the interests, rights and freedoms of the data subject or to ascertain, exercise or defend a legal claim;

- **Right to lodge a complaint with a Supervisory Authority:** The Data Protection Authority.

The aforementioned rights may be exercised regarding the Data Controller by writing to the addresses given above.

Exercising Your Rights as a data subject is free of charge as indicated in Article 12 of the GDPR. However, if the request is manifestly unfounded or excessive, including where such requests are repetitive, the Data Controller may charge a reasonable fee, in light of the administrative costs incurred to handle, or deny, your request.

COOKIE POLICY

Cookies are pieces of code installed in a browser that help the Data Controller to provide the service based on the purposes described. Some of the purposes for which Cookies are installed may also require Users' consent.

Technical and analytical cookies

- **Essential operating activities**
This Application uses Cookies to save Users' session and perform tasks that are essential to the operation thereof, for example, relating to traffic distribution.
- **To save preferences, improve Users' browsing experience and for analytical purposes**
This Application uses Cookies to save browsing preferences and improve Users' browsing experience. These Cookies include, for example, Cookies to set the language and currency or to help the Site Owner manage statistics.

Other types of Cookies or third-party tools that could be used

Some of the services listed below may not require User consent or may be directly managed by the Data Controller – as already mentioned – without third-party assistance.

If third-party services are indicated in the list of tools below, such services may – in addition to what is specified and also unbeknownst to the Data Controller – track Users. In order to

obtain detailed information to this regard, we suggest consulting the privacy policies of the services listed.

- **Interaction with social networks and external platforms**

These services enable interactions with social networks, or with other external platforms, directly from the pages of this Application. The interactions and information obtained by this Application are in any case subject to the User's privacy settings for each social network.

If a service is installed enabling interaction with social networks, this service may collect traffic data from the pages it is installed on, even if Users do not use the service.

- **Visualisation of content from external platforms**

These services allow content hosted on external platforms to be viewed directly from the pages of this Application and to interact with it. If such a service is installed, it may collect traffic data from the page it is installed on, even if Users do not use the service.

How can I check whether Cookies are installed?

In addition to what has been mentioned herein, Users can manage their Cookie preferences directly in their browser and prevent – for instance – third parties from installing them. Through browser preferences, previously installed Cookies may also be removed, including the Cookie saving User consent, if applicable, to the installation of Cookies by this site.

It is important to note that disabling all Cookies may compromise the functioning of this site. Users can find information on how to manage Cookies in their browser at the following addresses: Google Chrome, Mozilla Firefox, Apple Safari and Microsoft Windows Explorer.

For third-party services, Users can also exercise their right to refuse tracking by reading the third party's privacy policy, through the opt out link if explicitly provided or by contacting the third party directly.

Notwithstanding the foregoing, the Data Controller would like to inform Users that they can use Your Online Choices. This service allows Users to manage the preference tracking of most advertising tools. Therefore, the Data Controller suggests that Users use this resource in addition to the information provided herein.

Data Controller

As the installation of Cookies and other tracking systems operated by third parties through the services used in this Application cannot be technically controlled by the Data Controller, all specific references to Cookies and third-party tracking systems should be considered indicative. For complete information, please consult the privacy policy of the third-party services listed herein, where applicable.

Considering how difficult it is to identify Cookie-based technologies and how closely integrated they are with web functioning, Users are asked to contact the Data Controller for any additional information on the use of Cookies themselves and on the possible uses of Cookies – for example, by third parties – through this site.

Definitions and legal references

User data

User data are personal data collected automatically by the Application (or by the third-party applications it uses), including: the IP addresses or domain names of the computers used by the User that connects to the Application, URI (Uniform Resource Identifier) addresses, the time the request was made, the method used to send the request to the server, the size of the file received in response, the numerical response status code from the server (success, error, etc.), the country of origin, the characteristics of the browser and operating system used by the visitor, information regarding the time of the visit (for example, the length of time the User has remained on each page) and details on the itinerary followed within the Application, specifically regarding the sequence of the pages consulted, the parameters of the operating system and of the User's IT environment.

User

The individual who uses this Application, who must also coincide with or be authorised by the data subject and whose Personal Data will be processed.

Data Subject

The natural or legal person to whom the Personal Data refers.

Data Processor

The natural, legal person, the public administration and any other company, association or body appointed by the Data Controller to process Personal Data, as set out in this privacy policy.

Data Controller

The natural, legal person, the public administration and any other company, association or body that decide, also together with another data controller, why and how personal data are to be processed and the tools to be used, also as regards security, in relation to the functioning and use of this Application. The Data Controller, unless otherwise indicated, is the owner of this Application.

Cookies

Small pieces of data stored inside a User's device.

Legal Information

Note for European Users: this privacy policy has been drafted in compliance with the obligations set out by Art. 13 EU Reg. 2016/679 and by Directive 2002/58/EC, as updated by Directive 2009/136/EC, regarding Cookies.

This privacy policy only applies to this Application.