

Privacy Policy

The purpose of this document is to inform the individual (hereinafter referred to as the "**Data Subject**") regarding the processing of their personal data (hereinafter "**Personal Data**") collected by the data controller, Kalatà s.r.l. social enterprise, with registered office at Piazza Maggiore 3, VAT number 03766340040, email address info@kalata.it, certified email address kalata@legalmail.it, phone number 0174330976, (hereinafter the "**Controller**"), through the website www.kalata.it (hereinafter the "**Application**").

Changes and updates will be binding as soon as they are published on the Application. In case of non-acceptance of the changes made to the Privacy Policy, the Data Subject is required to cease using this Application and may request the Controller to delete their Personal Data.

1. Categories of Personal Data processed

The Controller processes the following types of Personal Data voluntarily provided by the Data Subject:

- **Contact details:** name, surname, address, email, phone number, images, authentication credentials, any additional information provided by the Data Subject, etc.
- **Fiscal and payment data:** tax code, VAT number, credit card details, bank account details, etc.

The Controller processes the following types of Personal Data collected automatically:

- **Technical data:** Personal Data produced by the devices, applications, tools, and protocols used, such as information about the device used, IP addresses, type of browser, type of Internet service provider (ISP). Such Personal Data may leave traces that, particularly if combined with unique identifiers and other information received from servers, can be used to create profiles of individuals.
- **Navigation and usage data of the Application:** such as visited pages, number of clicks, actions taken, session duration, etc.

Failure by the Data Subject to provide Personal Data for which there is a legal or contractual obligation, or which constitutes a necessary requirement for the conclusion of a contract with the Controller, will result in the Controller being unable to establish or continue the relationship with the Data Subject.

The Data Subject who provides the Controller with Personal Data of third parties is directly and exclusively responsible for their origin, collection, processing, communication, or dissemination.

2. Cookies and similar technologies

The Application uses cookies, web beacons, unique identifiers, and other similar technologies to collect the Data Subject's Personal Data on the pages, links visited, and other actions performed when using the Application. They are stored to be transmitted upon

the Data Subject's next visit. The complete Cookie Policy can be viewed at the following address: www.kalata.it/cookie

3. Legal basis and purposes of processing

The processing of Personal Data is necessary:

- for the performance of the contract with the Data Subject, specifically:
 1. **fulfillment of any obligation arising from the pre-contractual or contractual relationship with the Data Subject**
 2. **registration and authentication of the Data Subject:** to allow the Data Subject to register on the Application, access, and be identified also through external platforms
 3. **support and contact with the Data Subject:** to respond to the Data Subject's requests
 4. **payment management:** to manage payments by credit card, bank transfer, or other means
- for compliance with a legal obligation, specifically:
 1. **the fulfillment of any obligation provided for by current regulations,** laws, and regulations, in particular, in tax matters
- based on the legitimate interest of the Controller, for:
 1. **email marketing purposes of products and/or services of the controller** to directly sell the products or services of the Controller using the email provided by the Data Subject in the context of the sale of a product or service similar to that subject of the sale
 2. **management, optimization, and monitoring of the technical infrastructure:** to identify and resolve any technical problems, to improve the performance of the Application, to manage and organize information in an IT system (e.g., servers, databases, etc.)
 3. **statistical analysis with anonymous data:** to perform statistical analysis on aggregated and anonymous data to analyze the behaviors of the Data Subject, to improve the products and/or services provided by the Controller, and better meet the expectations of the Data Subject
- based on the consent of the Data Subject, for:
 1. **profiling of the Data Subject for marketing purposes:** to provide the Data Subject with information about the products and/or services of the Controller through automated processing aimed at collecting personal information with the purpose of predicting or evaluating their preferences or behaviors
 2. **retargeting and remarketing:** to reach the Data Subject with a personalized advertisement who has already visited or shown interest in the products and/or services offered by the Application using their Personal Data.
 3. **marketing purposes of products and/or services of the Controller:** to send information or commercial and/or promotional materials, to carry out direct sales activities of products and/or services of the Controller or to carry out market research through automated and traditional methods

4. **communication of Personal Data for marketing and analysis/research purposes of third parties:** to communicate to third parties such as Organizations and Entities in the Italian cultural and tourist sector, organizations and Entities partner of Kalatà (with particular reference to the Associazione Abbonamento Musei - Via Assarotti 9 - Torino / Piazza Città di Lombardia 1 - Milano) the Personal Data so that they can use them for analysis/research activities and send them information or commercial and/or promotional materials or to carry out direct sales activities of their products and/or services or to carry out market research through automated and traditional methods.

Based on the legitimate interest of the Controller, the Application allows interactions with external platforms or social networks whose processing of Personal Data is governed by their respective privacy policies to which reference should be made. The interactions and information acquired from this Application are in any case subject to the privacy settings chosen by the Data Subject on such platforms or social networks. This information - in the absence of specific consent to processing for further purposes - is used solely to enable the use of the Application and provide the requested information and services.

The Personal Data of the Data Subject may also be used by the Controller to protect themselves in court before the competent judicial authorities.

4. Processing methods and recipients of Personal Data

The processing of Personal Data is carried out using paper and electronic tools with organizational methods and logics strictly related to the purposes indicated and by adopting adequate security measures.

Personal Data is processed exclusively by:

- persons authorized by the Data Controller who have undertaken to maintain confidentiality or have an adequate legal obligation of confidentiality;
- subjects who operate autonomously as distinct data controllers or by subjects designated as data processors by the Controller in order to carry out all processing activities necessary to pursue the purposes set out in this information (for example, commercial partners, consultants, IT companies, service providers, hosting providers)
- Subjects or entities to whom it is mandatory to communicate Personal Data due to a legal obligation or order of the authorities.

The aforementioned subjects are required to use appropriate guarantees to protect Personal Data and may only access those necessary to carry out their assigned tasks.

Personal Data will not be indiscriminately disclosed in any way.

5. Location

Personal Data will not be subject to any transfer outside the territory of the European Economic Area (EEA).

6. Retention period of Personal Data

Personal Data will be retained for the period necessary to fulfill the purposes for which they were collected, in particular:

- for purposes related to the execution of the contract between the Controller and the Data Subject, they will be retained for the entire duration of the contractual relationship and, after termination, for the ordinary prescription period of 10 years. In the case of judicial disputes, for the entire duration thereof, until the expiration of the terms for challenging actions
- for purposes related to the legitimate interest of the Controller, they will be kept until the completion of such interest
- for compliance with a legal obligation, order of an authority, and for legal protection, they will be kept in compliance with the deadlines provided by said obligations, regulations, and in any case until the expiration of the limitation period provided by the applicable laws
- for purposes based on the Data Subject's consent, they will be kept until the revocation of consent. For marketing purposes, for a period not exceeding 24 months.

At the end of the retention period, all Personal Data will be deleted or stored in a form that does not allow the identification of the Data Subject.

7. Data Subject's Rights

Data Subjects may exercise certain rights with respect to the Personal Data processed by the Controller. In particular, the Data Subject has the right to:

- be informed about the processing of their Personal Data
- withdraw consent at any time
- limit the processing of their Personal Data
- object to the processing of their Personal Data
- access their Personal Data
- verify and request the rectification of their Personal Data
- obtain the restriction of the processing of their Personal Data
- obtain the erasure of their Personal Data
- transfer their Personal Data to another controller
- submit a complaint to the supervisory authority for the protection of their Personal Data and/or take legal action.

To exercise their rights, Data Subjects can send a request to the following email address info@kalata.it. Requests will be promptly handled by the Controller and processed as soon as possible, in any case within 30 days.

8. Data Protection Officer

The Data Protection Officer is Kalatà s.r.l. social enterprise, with registered office at Piazza Maggiore 3, VAT number 03766340040, email address info@kalata.it.

Last update: 07/04/2022