

## **DATA PROCESSING NOTICE**

Pursuant to article 13 of Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, ("GDPR"), we hereby provide information regarding the processing of personal data of participants in the #GoodVibes PHOTO CONTEST ("Contest").

### **1. Data controller**

The data controller is Osborne Clarke Studio Legale, with registered office at Corso di Porta Vittoria 9, 20122 - Milan ("Data Controller").

### **2. Categories of personal data to be processed**

As part of the data processing process, participants' personal data, such as personal details (name and surname, date of birth), contact details (email address and telephone number), any pictures may be processed.

### **3. Purpose and legal basis for processing and consequences of failure to provide personal data**

Participants' personal data will be processed for the execution and proper management of their participation in the Competition and for the awarding of prizes and benefits as provided for in the regulation.

The processing of personal data for this purpose will be carried out on the basis of the regulation which the participant has accepted in order to take part in the Contest.

The provision of personal data for the aforementioned purposes is optional, however, failure to provide personal data will result in the participant being unable to enter and participate in the Contest and to benefit from the related prizes and advantages provided.

### **4. How personal data are processed**

Personal data will be processed both with the aid of automated instruments and on paper, suitable to guarantee security and confidentiality, in order to collect, consult, store, manage, extract and transmit the same.

### **5. Data retention period**

Personal data will be kept for the time strictly necessary for the purposes set out in point 3 above, except in the case of specific legal obligations and/or for defensive purposes.

Afterwards, personal data will be deleted, aggregated or anonymised.

### **6. Recipients of personal data**

The personal data – which will not be divulged – may however be provided to:

- the Data Controller's employees or collaborators acting under the authority and instructions of the Data Controller and located in the territory of the European Union;



- third parties with which commercial partnership agreements and/or joint initiatives, campaigns and projects may be developed from time to time and which are in any case located in the territory of the European Union;
- persons, companies or professional firms providing assistance and consultancy in accounting, administrative, legal, tax and financial matters that are located in the territory of the European Union;
- persons, entities or authorities to whom the communication of the personal data is mandatory by virtue of provisions of law or orders of the authorities.

The subjects in the above-mentioned categories may operate, depending on the case, as data processors (and, in this case, will receive specific instructions from the Data Controller) or as autonomous data controllers. In the latter case, personal data will be communicated only with the explicit consent of the data subject, except in cases where communication is obligatory or necessary by law or to pursue purposes for which the data subject's consent is not required.

## **7. Transfer of personal data out of the EU**

The participant's personal data (and/or those of third parties, if and to the extent communicated) will not be transferred outside the European Economic Area. However, the Data Controller reserves the right to transfer personal data to third countries. Data transfers outside the European Economic Area are subject to a special regime under the GDPR, and are only made to countries that ensure an adequate level of protection of personal data, based on an adequacy decision by the Commission or where adequate safeguards have been adopted (including the standard contractual conditions provided by the European Commission), provided always that data subjects have enforceable rights and effective remedies.

## **8. Exercise of the data subject's rights**

The participant may at any time:

- obtain confirmation from the Data Controller as to whether or not their personal data is being processed, and if so, access said personal information pursuant to article 15 of the GDPR;
- obtain the rectification of personal data if they are inaccurate, or, taking into account the purposes of the processing, supplement them if they are incomplete;
- obtain the deletion of personal data if any of the conditions set out in article 17 of the GDPR apply;
- obtain the restriction of the processing of personal data, in the cases provided for in article 18 of the GDPR;
- object to the processing of personal data for reasons relating to the data subject's/participant's particular situation, where applicable;
- receive in a structured, commonly used and machine-readable format the personal data concerning them that have been provided by them, also for the purpose of transmitting such personal data to another data controller, in the cases and within the limits set out in article 20 of the GDPR, where applicable.

The participant is also entitled to withdraw consent to the processing of personal data (where given) at any time, without prejudice to the lawfulness of the processing carried out on the basis of the consent previously given, by sending an e-mail to [info@findtheorange.it](mailto:info@findtheorange.it) .

Pursuant to the GDPR, the Data Controller is not authorised to charge costs for complying with any of the requests set out in this paragraph, unless said requests are manifestly unfounded or excessive, and in particular are repetitive in nature. If the participant requests more than one copy of the personal data or in cases of excessive or unfounded requests, the Data Controller may (i) charge a reasonable fee, taking into account the administrative costs incurred to process the request, or (ii) refuse to comply with the request. In such cases, the Data Controller will inform the data subject of the costs before processing the request.

The Data Controller may request further information before complying with the above requests if necessary in order to verify the identity of the data subject.

Without prejudice to any other administrative or jurisdictional recourse, the participant shall also have the right to lodge a complaint with a Supervisory Authority (for Italy: the *Garante per la protezione dei dati personali*), if they consider that the processing is carried out in breach of the GDPR and applicable data protection legislation. Further information is available on the website <http://www.garanteprivacy.it>

## **9. Contact details in order to exercise the data subject's rights and request further information**

In order to exercise rights and/or to obtain any information needed in relation to this policy, please write to FindTheOrange, Corso di Porta Vittoria, 9 – 20122 Milan or send an email to [info@findtheorange.it](mailto:info@findtheorange.it)

