

"Newsletter" Privacy Policy



1. Data Controller

Fondazione Centro di Musicologia Walter Stauffer, with registered office in Cremona - Corso Garibaldi n. 178, VAT and tax code 00319130191, hereinafter referred to as the "**Controller**", guarantees compliance with the regulations on the protection of personal data by providing the following information on data processing, pursuant to art. 13, EU Regulation 2016/679 (General Data Protection Regulation - GDPR) and subsequent amendments.



2. Data processed, purposes and legal bases for processing

Personal data is provided voluntarily by the user, collected via the newsletter platform and processed for the following purposes:

- a) in the presence of specific consent, to receive communications relating to the cultural activities of the same Owner, invitations to events as well as updates on our activities and reports on publications via post, telephone, e-mail, text message or messaging app;
- b) in the presence of specific consent, to receive an invitation to participate in statistical analyzes via post, telephone, email, text message or messaging app.

For complete information, please note that, in sending communications, the Data Controller uses the Mailup newsletter and mail marketing platform that, through statistical tracking systems (for example web beacons, pixels, etc.), allows you to detect the opening of a message, the clicks made on the hyperlinks contained within the email, from which IP address or with which type of browser the mail is opened and other similar details.

The collection of such data is functional to the use of the platform and is an integral part of the functionality of the message sending system.

For more information about the GDPR compliance of the Mailup platform click [here](#).

The legal basis for the data processing with respect to the purposes set out is the consent of the interested party.



3. Nature of data provision

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

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



4. Places and methods of data processing and retention times

The data collected by the site are processed at the headquarters of the Data Controller, and at the data centers of the MailUp newsletter sending platform regularly indicated as Data Processor, as well as at the offices of third parties, always named Data Processor, or, depending on the case, of all the subjects necessary for the correct fulfillment of the purposes set out in point 2.

For completeness, we inform you that it is possible to find information regarding the use of data and compliance with the GDPR of the MailUp newsletter sending platform [here](#).

The data collected will be processed using electronic or automated, IT and telematic tools, or through manual processing with logic strictly related to the purposes for which the personal data were collected and, in any case, in such a way as to guarantee in any case the security of the same.

The data are kept for the time strictly necessary for the management of the purposes for which the data are processed ("principle of limitation of conservation", art.5, EU Regulation 2016/679) or until consent is revoked or in compliance with the deadlines established by current regulations and legal obligations.



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

The processing of the data collected is carried out by internal staff of the Data Controller identified and authorized for this purpose according to specific instructions given in compliance with current legislation.

The data collected, within the limits relevant to the processing purposes indicated and if it is necessary or instrumental for the execution of the purposes themselves, may be processed by third parties appointed as external data processors, or, depending on the case, communicated to them as independent data controllers., and precisely companies, bodies, associations that carry out 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, only in the cases provided for by law, by the Judicial Authority.

In no case and for no reason will your data be disseminated in any way.



6. Transfer of Data to Non-EU Countries

The data may be transferred abroad to non-European countries, and in particular to the USA, only after verification of the standard contractual clauses (Standard Contractual Clauses) adopted/approved by the European Commission pursuant to art. 46, par. 2, lit. c) and d) of the GDPR or of the binding rules for the company pursuant to art. 47 of the GDPR or, failing that, by virtue of one of the derogatory measures pursuant to art. 49 of the GDPR.

The transfer to the USA is authorized on the basis of the specific agreement called EU-US Data Privacy Framework (available [here](#)), for which no further consent is required.



7. Rights of the Data Subject

In relation to the Personal Data communicated, 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 request a copy;
- c. (Art. 16 EU Regulation 679/2016 - GDPR) request correction;
- d. (Art. 17 EU Regulation 679/2016 - GDPR) request cancellation ("right to be forgotten");
- e. (Art. 18 EU Regulation 679/2016 - GDPR) obtain the limitation 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) oppose the processing.

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

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

Pursuant to art. 77 EU Regulation 679/2016 - GDPR, the subject retains the right to lodge a complaint with the supervisory authority, based in Rome, Piazza Venezia n. 11; Tel. +39 06 696771, email: protocollo@gpdp.it.

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