

"Website" 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

2.1. Data generated by access to the site

During their normal operation, the computer systems and software procedures used to operate this website acquire certain personal data in an automated way, the transmission of which is implicit in the use of internet communication protocols.

The information collected could include the following:

- Domain names;
- Internet Protocol (IP) address;
- Operating system used;
- Type of browser and device parameters utilised to connect to the Website;
- The Web page that referred the origin and exit of the visitor (referral).

The information listed here is processed automatically and collected in an exclusively aggregated form in order to verify the correct functioning of the Website, and for security reasons.

The legal basis for data processing is the legitimate interest of the Data Controller.

2.2. Data recorded for security purposes

As a security measure (anti-spam filters, firewalls, and virus detection), the data automatically stored may also include personal data such as the IP address. Such data may be used to block attempts to hack the Website or other users, or any other harmful or illegal activity, and is handled according to the laws governing data usage and storage. These data are never used for the identification or profiling of the user, but only for the purpose of protecting the Website and its users.

The legal basis for data processing is the legitimate interest of the Data Controller.

2.3. Data submitted voluntarily by users

The personal data provided by the user through the form are collected and processed for the following purposes:

- a) for carrying out customer relationship activities based on contractual and/or pre-contractual agreements;
- b) for the occasional sending of emails relating to products already purchased or similar to them (so-called "soft-spam");
- c) in the case of sending a Curriculum Vitae, exclusively for selection purposes.

The legal basis for the data processing:

- with respect to the purposes referred to in point 2.3 letters a) and c) is the performance of a contract to which the Data Subject is party or the performance of pre-contractual measures adopted at the request of the Data Subject;
- with respect to the purposes referred to in point 2.3 letter b) is the legitimate interest of the Data Controller.

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](#).



3. Nature of data provision

Apart from what has been specified for navigation data and for data collected through the contact form, the provision of data:

- with respect to the purposes referred to in point 2.3 letters a) and c) is mandatory and any refusal will make it impossible for the Data Controller to implement the contractual or pre-contractual commitments undertaken;
- with respect to the purposes referred to in point 2.3 letter c) is optional but any refusal will make it impossible for the Data Controller to send emails relating to products already purchased or similar.



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 registrar Aruba Spa and of the web hosting provider Serverplan srl, a single-member company regularly indicated as Data Processor. For completeness, we inform you that it is possible to find more information regarding the GDPR compliance of Serverplan srl [here](#) e [here](#) (Art. 20.2).

The data collected will be processed by electronic or automated, computerized and telematic means, or by manual processing with logic strictly related to the purposes for which the personal data were collected and, in any case, in order to ensure the security of the same.

The data collected, including those relating to electronic traffic, are kept for the time strictly necessary to manage the purposes for which the data are processed ("conservation limitation principle", art.5, EU Regulation 2016/679) or in compliance with the deadlines established by current regulations and legal obligations. Once the retention period established by law has elapsed, and unless otherwise indicated by the Authority with an administrative or judicial provision, the above data will be destroyed and the possibility of obtaining a copy will no longer be guaranteed.



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

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

The data collected, within the limits pertinent 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 Data Processors (External Data Processors), or, depending on the case, by the same as independent Data Controllers, as well as communicated to all the subjects necessary for the correct fulfillment of the purposes set out in point 2.

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

You can find information about data usage and GDPR compliance at the following links:

- Google [here](#);
- Facebook e Instagram (Meta) [here](#);
- LinkedIn [here](#) e [here](#);
- Google Analytics [here](#) e [here](#);
- MailUp [here](#).



7. Rights of the Data Subject

In relation to the Personal Data communicated, the Data Subject has the right to exercise the following rights:

- (Art. 7.3 EU Regulation 679/2016 – GDPR) withdrawal of consent
- (Art. 15 EU Regulation 679/2016 - GDPR) access and request a copy;
- (Art. 16 EU Regulation 679/2016 - GDPR) request correction;
- (Art. 17 EU Regulation 679/2016 - GDPR) request cancellation ("right to be forgotten");
- (Art. 18 EU Regulation 679/2016 - GDPR) obtain the limitation of processing;
- (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;
- (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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