

## UFFIZI GALLERIES

### PERSONAL DATA PROCESSING POLICY

pursuant to article 13 of the "European General Data Protection Regulation" (GDPR)

With this document ("Policy"), the Uffizi Galleries, as the entity through which the Ministry of Culture (MIC) exercises the functions of Personal Data Processing Controller pursuant to Ministerial Decree no. 147 of 14 March 2019, wishes to inform you of the purposes and methods of the processing of your personal data and of the rights granted to you by Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free circulation thereof ("GDPR").

#### 1. Data Controller

-The Data Controller of personal data is Ministry of Culture (MIC).  
-Your data, for the purposes foreseen by this policy, will be collected and processed by the Uffizi Galleries (hereinafter also referred to as "Uffizi" or "Institute"), in its capacity as Data Controller, with registered office in Piazzale degli Uffizi 6 - 50122 Florence (FI).

#### 2. Data Protection Officer

The MIC, as Data Controller, has identified by Ministerial Decree of 24 July 2020, file number 349/2020, a Data Protection Officer, pursuant to articles 37 et seq. of the GDPR, who is identified as: Stefano Vitali. For questions concerning the processing of personal data, the data subject may contact:

I. Primarily, the DPO contact person appointed by the Uffizi Galleries (article 3, letter e) of Ministerial Decree no. 147 of 14 March 2019) at the following e-mail address: [ga-uff.privacy@beniculturali.it](mailto:ga-uff.privacy@beniculturali.it).

II. On a residual basis, the DPO as follows:

- by e-mail at [rpd@beniculturali.it](mailto:rpd@beniculturali.it) or at the certified e-mail address (PEC) [rpd@mailcert.beniculturali.it](mailto:rpd@mailcert.beniculturali.it);  
- by telephone at the number: 0654548568.

#### 3. Information on processing.

The personal data subject to processing is collected and processed by the Uffizi Galleries, or by third parties expressly authorised by the same, or communicated by the Institute to such third parties for the pursuit of the purposes described below.

4. Personal data processed. The personal data processed by the data controller are those provided by the data subject, such as personal data and contact details: name, surname, e-mail address, telephone number (if provided).

#### 5. Purpose and legal basis of processing.

Your personal data will be processed (for the definition of "processing" see article 4, paragraph 1, no. 2 of the Regulation) for the following purpose:

Provision of the Newsletter service and sending of communications for promotional purposes

In the event that you decide to subscribe to the Uffizi Galleries Newsletter, only after your eventual and specific consent, your personal data will be processed by the data controller also for the purpose of sending updates on events organised by the Uffizi Galleries and promotional communications.

#### 6. Processing method

The data provided is processed by the Uffizi Galleries in accordance with the current Privacy regulations. The Uffizi Galleries undertakes, in particular, to process them according to the principles of correctness, lawfulness and transparency, to collect them in the necessary and exact measure for their processing and to allow their use only by personnel authorised for this purpose.

The Data Controller carries out the processing of personal data by means of paper, IT and/or telematic tools and with organisational and logical methods strictly related to the pursuit of the purposes indicated in this policy, as well as adopting appropriate security measures in order to prevent unauthorised access, disclosure, modification or destruction of personal data.

#### 7. Nature of data provision

The provision of data for the purposes referred to in article 5 "Provision of the Newsletter service and sending of communications for promotional purposes" is optional and its processing requires the consent of the data subject.

#### 8. Period of data retention

All data held by the Uffizi Galleries is retained only for the period of time necessary according to management requirements and applicable legal obligations. Since the Uffizi Galleries is subject to specific data retention regulations (Cultural Heritage Code, Digital Administration Code, Consolidated Text of legislative and regulatory provisions regarding administrative documentation, Regulations regarding administrative procedures and the right of access to administrative documents, VAT and accounting regulations), all data is retained for the time established by these regulations and is also physically cancelled by means of an archival discarding procedure (D.P.R. - Presidential Decree 08 January 2001, no. 37 Regulation of simplification of the procedures for the constitution and renewal of the Commissions of surveillance on the archives and for the discarding of documents of the offices of the State). The timing can be very different depending on the purpose of processing, as described in point 5 in this policy. The criterion to establish them is based on principles of common sense and on the clarifications of the Guarantor Authority according to which data can be retained in general "as long as there is a justifiable interest" and that is until their retention is necessary for the purposes for which they were collected and processed.

The Data Controller or the person performing the functions of the Data Controller will, upon written request by the data subject, provide a copy of the personal data being processed. In the event of further copies requested by the data subject, the Data Controller or the party exercising the functions of Data Controller will charge a fee commensurate with the administrative costs. The data subject's right to obtain a copy must not infringe on the rights and freedoms of others.

#### 9. Recipients and persons in charge of data processing

The data collected will not be disseminated in any way. However, they will be processed within the limits and for the purposes described by employees of the Institute on the basis of appropriate operating instructions. Some data processing operations may also be carried out by third parties, appointed as Data Processors pursuant to article 28 of the Regulations, which the Data Controller uses or may use for the provision of the services offered and for the organisational requirements of its business (e.g. for management and maintenance requirements of the IT platforms and related hardware devices). The complete list of external parties to whom your data is communicated is available upon request by e-mail: [ga-uff.privacy@beniculturali.it](mailto:ga-uff.privacy@beniculturali.it).

## 10. Communication of data

Without your express consent (pursuant to article 6 lett. b) and c) of the Regulation), the Data Controller or the party exercising the functions of Data Controller may communicate your data for the purposes referred to in article 5 to supervisory bodies, judicial authorities and to all other persons to whom the communication is required by law for the fulfillment of the above purposes.

## 11. Data transfer

The management and retention of personal data will take place on the server of the Data Controller or the party exercising the functions of Data Controller and/or third-party companies duly appointed as Data Processors located within the European Union. Currently, the servers are located in Italy. However, it is understood that the Data Controller or the party exercising the functions of Data Controller, if necessary, will have the right to move the location of servers within the European Union and/or non-EU countries. In this case, the Data Controller, or the party exercising the functions of Data Controller, ensures as of now that the transfer of data outside the EU will take place in accordance with articles 44 et seq. of the Regulation and the applicable legal provisions by entering into, if necessary, agreements that guarantee an adequate level of protection. In particular, it must ensure that adequate technical and organisational measures are in place so that processing meets the requirements of the Privacy Code and the GDPR, that the protection of the rights of interested third parties is ensured, that data transfers can be traced and that the appropriate security measures can be documented.

## 12. Rights of the data subject

In your capacity as data subject, we inform you that you can exercise all the rights provided for by article 15 of the Regulation, namely:

- a) the right to obtain confirmation as to whether or not personal data concerning you are being processed and, if so, to obtain access to the personal data and the following information: (i) the categories of personal data concerned; (ii) the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular whether third countries or international organisations; (iii) when possible, the expected period of retention of the personal data or, if this is not possible, the criteria used to determine this period; iv) the existence of the right of the data subject to request from the Data Controller, or the party exercising the functions of Data Controller, of the processing the rectification or erasure of personal data or the restriction of the processing of personal data concerning them or to object to their processing; v) the right to lodge a complaint with a supervisory authority, pursuant to articles 77 et seq. of the Regulation; vi) if the data are not collected from the data subject, all available information on their origin; vii) the existence of an automated decision-making process, including profiling as referred to in article 22, paragraphs 1 and 4 of the Regulation, and, at least in such cases, meaningful information on the

logic used, as well as the importance and expected consequences of such processing for the data subject viii) the right to be informed of the existence of adequate guarantees pursuant to article 46 of the Regulation relating to the transfer, if personal data are transferred to a third country or an international organisation;

- b) the rights (where applicable) under articles 16-21 of the Regulation (Right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object).

We inform you that the Uffizi Galleries is committed to responding to your request within one month of receiving it. This term may be extended, for no more than two months, depending on the complexity or number of requests and the Institute will explain the reason for the extension within one month of your request. It should also be noted that if the Uffizi Galleries does not comply with the request, it is obliged to provide feedback to the data subject regarding the reasons for non-compliance and the possibility to lodge a complaint with a supervisory authority or judicial appeal within one month of receiving the request. The outcome of your request may be provided to you in writing or electronically.

### 13. Procedures for the exercise of rights

The data subject may at any time exercise its rights under articles 15 et seq. of the Regulation in the following ways:

by sending an e-mail to the DPO contact person at the address: [ga-uff.privacy@beniculturali.it](mailto:ga-uff.privacy@beniculturali.it). by sending a registered letter with return receipt to the registered office of the Institute at the address: Piazzale degli Uffizi 6 - 50122 Florence (FI).

### 14. Amendments to this policy

The Uffizi Galleries undertakes to inform the data subject of any amendments to this policy.

Uffizi Galleries (in its capacity as Data Controller)

Eike D. Schmidt