

**Ente per le Arti Applicate alla Moda ed al Costume - Polimoda –Library Services**

**Information for those concerned in accordance with Article 13 of the European Regulation on the Protection of Personal Data (GDPR – General Data Protection Regulation) No. 679/2016 and attached provisions issued by the National and European Authorities**

**Premises**

Please note: this information is provided only for the website that you are visiting and not for other websites you may visit using the links; other websites that may be visited through links on this website may contain tracking systems that are nothing to do with Polimoda. Therefore, Polimoda cannot guarantee that these “external” sites have suitable security systems to safeguard the data processed and to prevent any damage (e.g. from computer viruses).

With this document, we inform you that, to:

- provide the services you request,
- access to the Polimoda Library and the use of related services and materials
- establish and execute contractual relations with you, including in the future,
- provide information, including of a promotional nature (compliant with the applicable regulations)

we need to acquire data concerning you; such data are considered “personal data” by GDPR no. 679/2016. This standard sets down that those subjects obliged to comply with the prescriptions it contains and who process personal data are obliged to inform the data subject – notwithstanding simplifications in legislation – of the elements relating to the processing operations: the policy statement must, to safeguard your privacy and your rights, be concise, transparent, intelligible and easily accessible (therefore, reference should be made to the summary document on the cover). Pursuant to this article, we are providing you with the following information, in line with the principles of correct management of personal data.

We must inform you that this document will be integrated with an approach to icons after they have been agreed unequivocally and at European level.

<p><b>The Data Controller</b></p>	<p>The data controller is the "Ente per le Arti Applicate alla Moda ed al Costume", also referred to as "Polimoda", with registered offices in Villa Favard - Via Curtatone, 1 - 50123 Florence (Italy)  E-mail: <a href="mailto:orientation@polimoda.com">orientation@polimoda.com</a> - <a href="mailto:privacy@polimoda.com">privacy@polimoda.com</a>  Registered email: <a href="mailto:direzione@pec.polimoda.biz">direzione@pec.polimoda.biz</a>  Website: <a href="http://www.polimoda.com">www.polimoda.com</a> – : further information and instructions of a legal and/or other nature also partly connected to this document may be found on the website; this does not affect your right to contact us for further explanation to safeguard and guarantee your rights</p>
<p><b>Contact information of the Responsible of the protection of personal data (RPD o DPO – Data Protection Officer)</b></p>	<p>To date, the Association, having carried out the relevant assessments, has not identified a person to be responsible for the protection of personal data, (RPD o DPO – Data Protection Officer); a reservation remains, however, to integrate this policy statement in the event of any different implementation of procedures (ref. Articles 37-38-39 of GDPR no. 679/2016 and Guidelines issued by the Privacy Authority concerning the protection of personal data and by the Article 29 Working Party (WP29).  In any case, Polimoda uses external consultants specialising in the subject of safeguarding the privacy of natural persons and in house, it has persons dedicated to the subject in question, who act as filters in the management of relations with the aforementioned specialists or with data subjects and with the supervisory authorities.  It is in any case possible for the data subject to contact the persons in charge at Polimoda via the contact means made available here.</p>
<p><b>The Data Processors</b></p>	<p>The persons in charge of processing, as defined and regulated by art. 28 of the GDPR, are named in the specific list available from the offices of Polimoda and which can be requested in writing using the above references.  The data controller has carried out thorough analysis of the role of subjects appointed as data processing and the impacts and risks connected to the operations of said subjects, signing contractual agreements covering the contents envisaged by the regulations as per GDPR no. 679/2016.</p>
<p><b>Categories of data processed</b></p>	<ul style="list-style-type: none"> <li>• <b>Common data:</b> <ul style="list-style-type: none"> <li>– name and surname</li> <li>– telephone number</li> <li>– mobile number</li> <li>– residence/domicile address</li> <li>– e-mail</li> <li>– gender</li> <li>– place and date of birth</li> <li>– educational qualification</li> </ul> </li> <li>• <b>Data linked to browsing on this website:</b>  As well as data you provide expressly to Polimoda, other data may be recorded due to your browsing on this website. For all website access, we record the type of browser (e.g. Internet Explorer, Mozilla), the operating system (e.g. Windows, Macintosh) and the host and URL of the visitor, as well as data on the requested page. These data can be used in aggregate, anonymous form for statistical analysis of website use.  Other personal data collected may – in the future – be mentioned in other sections of this page or in information statements shown at the same time as the collection of the data within the specific sections, if any.  Personal data can be voluntarily entered by the user or collected automatically during the use of this application.  The use of cookies – or other tracking tools – by this application or by the owners of third-party services, where not otherwise stated, aims to identify the user and record the relevant preferences for aims strictly linked to the provision of the services/information requested by the user.  Failure by the user to provide certain personal data may prevent this application and our association to provide our services and to reply /follow up your requests. Please see the cookie policy for details.  The user takes responsibility for third party data published or shared via this website and guarantees that he or she has the right</li> </ul>

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to communicate or disclose them, freeing the data controller from any liability to third parties.

<b>Source of data</b>	Personal data processed by us are collected/received directly or by third party institutions that collaborate with Polimoda and require subscription for access to the Library for the benefit of their staff/students etc. ...
<b>Conditions for processing</b>	The conditions for data processing (without prejudice to the standards and regulations to which the data controller is subject), are as follows: <input type="checkbox"/> Request for access to the Polimoda Library in order to access related services, with permission to consult the materials exclusively on site; <input type="checkbox"/> Regulation / Guidelines relating to access to the Library and to the use of the relative hard-copy and electronic materials; <input type="checkbox"/> Regulatory and/or legislative provisions specific to the sector of which Polimoda is a part; <input type="checkbox"/> Applications/Request from the data subject
<b>Purposes of the processing</b>	
<b>Standard purposes (consent necessary)</b>	<input type="checkbox"/> Purposes related to the use of your data for access to the services offered by the Polimoda Library and other ancillary activities related to and/or in support of these services, which are, purely by way of example and not limited to: - use of the Library's resources and of the materials in general in the Library and available for consultation; - insertion of data in a database dedicated to monitoring the above-mentioned library resources and any other materials; - the possibility of being contacted by Polimoda through IT tools (see email) and/or by telephone to check the movement of resources and materials mentioned herein (recalling that for external users it is not permitted to take any materials home for consultation) without prejudice to the Regulation / Guidelines governing the use of the Library services. <input type="checkbox"/> Purposes – in case of donation of volumes and/or other materials – inherent to the acquisition and assessment of the volumes and/or other materials donated, in order to manage subsequent communications that might prove to be appropriate or necessary though the use of references supplied by you. <input type="checkbox"/> Purposes connected to receiving and monitoring the payment related to your access to and use of the services; <input type="checkbox"/> Purposes connected and instrumental to the fulfilment of the obligations established by agreements, also of contractual nature, by laws, regulations and/or by the European legislation; <input type="checkbox"/> Purposes aimed at asserting the rights also by third parties before the courts as well as arbitration and administrative bodies in compliance with regulatory restrictions; <input type="checkbox"/> Purposes related and instrumental to the management of the contractual relationship (which is embodied in the acceptance of your request to access the Polimoda Library) stipulated or in the process of definition and the relative obligations.
<b>Other purposes</b>	
<b>Profiling</b>	No automatic profiling activities are implemented with regard to the Library's patrons (generally, to natural persons) for the purpose of analysing or forecasting areas that will concern professional performance, economic status, health, personal preferences or interests, reliability or behaviour, or the location and movements of the data subject to the extent that this would allow the data subject's profile to be mapped, with resulting targeted – and mainly promotional – actions towards you.
<b>Methods and criteria for processing your personal data</b>	Your personal data will be processed using manual, computer and/or telematic instruments, with methods and logics strictly related to the purposes above indicated, in a way that guarantee the confidentiality and safety of your data. In the event you should require more information, we remind you of your guaranteed rights, as specified here.
<b>Protection of minors</b>	Given that minors have additional guarantees in terms of confidentiality, consent for the processing of data concerning persons under the age of 18 should in any case be formalised by a parent or carer. In any case, should we find ourselves in possession of personal information belonging to a minor, we will immediately delete any information in our files. Should we be provided with untruthful data, the association will be considered held free and harmless from any responsibility and/or claims, without prejudice to the controls which it undertakes to make.
<b>Provisions of data</b>	The provision of personal data to the data controller represents an obligation by the data subject only insofar as same are necessary to answer, give indications, and provide services; in the case that personal data is not issued, the data controller will not be able to meet such conditions. The same applies for data that the data controller is obliged to acquire in order to comply with legislative and/or regulatory requirements. Optional entry of data in the form on the website (newsletter, contact form, etc.) as well as the optional, explicit and voluntary sending of data via web form or email to the addresses provided on this website, aimed to obtaining specific services and/or communication and information, involves the successive acquisition of the address/reference of the sender, necessary to respond to the request or provide the services, communications or information required, as well as of any other personal data entered.
<b>Categories of recipients of personal data</b>	Your data in general can be communicated by us, by which we mean notifying specific subjects or be hosted on third-party servers, located in the territory of the European Union and /or outside of the European Union, which Polimoda uses for the development and implementation of various services with the following terms: <input type="checkbox"/> Polimoda employees and assimilated workers operating under its authority (administrative personnel, etc.) and duly trained, monitored and instructed by the data controller and in particular to the personnel responsible for the management and supervision of the Library, limited to the requirements of related communications (name and email address and/or phone number and any other means of contact you have provided);

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	<ul style="list-style-type: none"> <li><input type="checkbox"/> to individuals/parties who may access the data according to provisions of law, regulations or European Union legislation, within the limits established by these regulations;</li> <li><input type="checkbox"/> to individuals/parties who need to access your data for purposes ancillary to the relationship existing between you and us, within the limits strictly necessary to carry out related tasks</li> <li><input type="checkbox"/> to subjects who need to access the data for purposes strictly linked to administering your request to access the Library and/or donate materials to the Library, within the limits strictly necessary to perform the related tasks (public safety subjects and other public or private subjects for the performance of legal obligations foreseen by the law including administrative and other obligations);</li> <li><input type="checkbox"/> to external consultants such as lawyers, accountants, business consultants, trade associations, etc.;</li> <li><input type="checkbox"/> to third parties that carry out or provide specific services instrumental to the performance of the relationship with you;</li> <li><input type="checkbox"/> to individuals/parties who, for contractual needs and purposes preliminary to the management of the activities agreed with you and/or ancillary services and/or your specific requests, must acquire one or more set of data about you;</li> <li><input type="checkbox"/> to the web administrators of Polimoda's corporate website (to date Moze S.r.l. with registered offices in Milan, Via Merano, 16);</li> <li><input type="checkbox"/> to web administrators of the newsletter platform service to other subjects/hosting providers/suppliers of technical services who carry out, on our own behalf, tasks of a technical and/or organizational nature instrumental to the provision of the services required or who, for contractual needs and purposes preliminary to the management of the activities agreed with you and/or ancillary services and/or your specific requests, must acquire one or more set of data about you (by way of example but not limited to: Var Group S.p.a., Via della Piovola 138, - 50053 Empoli - FI), as well as to any third party in various capacities involved in the related activities;</li> <li><input type="checkbox"/> to system administrators specifically authorized by the undersigned in compliance with regulatory requirements.</li> </ul> <p>Without prejudice to the recipients nominally mentioned here, reference should be made to the categories of goods/services referred to in the previous points, as suppliers may obviously vary over time; in any case Polimoda manages and updates a list of recipients/external managers/system administrators, which may be requested by the interested party using the procedures envisioned for the exercise of the rights.</p> <p><b>IMPORTANT NOTE: your data will not be disclosed to third parties for their marketing purposes.</b></p>
<p><b>Retention period</b></p>	<p>Your personal data will be stored on our files for the purposes mentioned here and based on your permission, for the period considered necessary, i.e.:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> up to 10 years</li> <li><input type="checkbox"/> based on different criteria according to the nature of the data subject</li> <li><input type="checkbox"/> based on specific criteria according to the purpose for which the data are processed</li> </ul> <p>This is without prejudice to the possibility to revoke consent at any time without prejudice to the lawfulness of treatment based on authorisation issued before the cancellation.</p>
<p><b>Transfer to third-party (non-EU) countries</b></p>	<p>The Data Controller: intends to transfer the personal data to non-EU countries (a list and attached documentation are available at the Association's headquarters by request of the interested party using the procedures envisioned for the exercise of the rights).</p>
<p><b>Complaints to the privacy authority</b></p>	<p>You can submit complaints to the supervisory authorities:</p> <ul style="list-style-type: none"> <li>- in Italy (where the Italian authorities are competent) using the form that can be downloaded from the link: <a href="http://www.garanteprivacy.it">www.garanteprivacy.it</a> in the dedicated section;</li> <li>- outside Italy, based on specific instructions from the EU member state:             <ul style="list-style-type: none"> <li>• of usual residence,</li> <li>• of work</li> <li>• of the place in which the presumed breach occurred</li> </ul> </li> </ul>
<p><b>Your rights</b></p>	<p><b>Right of access:</b> you can receive a copy of the personal data subject to processing at any time.</p> <p><b>Right to restrict the data:</b> this right can only be exercised in case of a breach of the lawful premises to the processing, but also in cases in which you request that the data be corrected or object to the processing; the Data Controller undertakes to identify the data in question when assessing the procedure to be followed by implementing organisational measures suited to this purpose.</p> <p><b>Right to correct the data:</b> you can obtain without undue delay the rectification of inaccurate personal data concerning your person and you can also have incomplete personal data completed, including by means of providing a supplementary statement</p> <p><b>Right to object to the data:</b> you can object, on grounds relating to your particular situation, at any time to processing of your personal data also if these are processed for direct marketing or profiling activities.</p> <p><b>Right to revoke consent:</b> if your consent is provided, by means of example, for marketing purposes.</p> <p><b>Right to be forgotten:</b> Data Subjects can request the enforced deletion of their data, for example, also after withdrawing authorisation for their data to be processed.</p> <p><b>Right to portability:</b> not applicable to non-automated processing and therefore to paper files and/or hard copies of registers; additionally; this is applicable only to the data provided by the Data Subject to the Data Controller and processed with the authorisation of the former or based on a contract established with the Data Controller.</p>

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**Terms and methods of response to data subjects**

Please note that when you exercise your rights, the Data Controller must provide a written answer, also using electronic means that allow accessibility (orally, only upon the express request of the Data Subject), within the term of 1 (one) month and that in cases of specific complexity this can be extended to 3 (three) months, without prejudice to the obligation to provide a response within one month of the request, even in case of denial.  
The Data Controller, after assessing the complexity of the request formulated by the Data Subject, may set the amount of any contributions to be requested from the same, but only if the requests prove manifestly groundless or excessive.

**You can exercise your rights by contacting Polimoda**

<b>E-mail</b>	<b>Registered offices</b>	<b>Phone</b>	<b>Fax</b>
<b>privacy@polimoda.com</b>	<b>Via Curtatone n. 1 50123 Firenze</b>	<b>+39 055 275061</b>	<b>+39 055 275020</b>