

Data protection policy pursuant to Article 13 of Regulation (EU) No. 2016/679 ("GDPR")

As provided for by the European Union Regulation no. 2016/679 ("GDPR"), and in particular Article 13 thereof, the Data Controller (the Accademia Musicale Chigiana Foundation, hereafter: "**FAMC**") provides the interested party (the "**Party**") - without prejudice to the general data protection policy that can be consulted on the website of FAMC <https://chigiana.org/privacy/> and which is deemed to be fully referred herein - with information relating to the processing of his/her personal data with specific reference to the use of the mfClassrooms platform (hereafter, the "**Platform**"). The foregoing shall not affect the policies provided by the Owner of the Platform, autonomous Data controller of some personal data.

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FAMC - for the sole technical purposes aimed at the correct performance of the service on the Platform - can autonomously collect and/or receive information regarding the Party, such as: personal data (e.g. name, surname, physical address, date of birth, nationality, province and municipality of residence, fixed and/or mobile phone, fax, tax code, e-mail address(es)), telematic traffic data (e.g. log, IP address of origin). The legal basis for data processing is precisely the fulfilment of all obligations of FAMC towards the Party.

FAMC shall not ask the Party, for any reason, to provide "particular" data, i.e., pursuant to art. 9 of the GDPR, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as genetic data, biometric data aimed at uniquely identifying a natural person, data relating to the health or sexual life or sexual orientation of the person.

HOWEVER, PLEASE ACKNOWLEDGE THAT, IN ORDER TO COMPLY WITH THE CONTRACTUAL AND LEGAL PROVISIONS RELATED TO THE USE OF THE PLATFORM, FAMC HAS THE RIGHT TO ACCESS ALL CONVERSATIONS OF TEACHERS AND USERS AND OF USERS AMONG THEMSELVES, IN ORDER TO DELETE MESSAGES OR ATTACHED FILES THAT DO NOT RESPECT ANY INTELLECTUAL PROPERTY RIGHTS, VIOLATE LEGAL PROVISIONS OR THE RULES OF CIVIL COHABITATION. FAMC undertakes not to treat these messages and files in any other way, except in the case that they must be transmitted to the competent authority because of their criminal relevance.

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FAMC provides adequate security measures in order to preserve the confidentiality, integrity and availability of the personal data of the Party, which will be kept until the request for cancellation by the Party or - if earlier - at the expiry of the applicable legal terms in accordance with Italian legal and fiscal rules in force from time to time. In any case, all personal data not requested, not necessary or redundant for the achievement of the purposes identified above will be erased. Personal data are stored in computers and telematic archives located in Italy.

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The Party is entitled to the rights set out in Articles from 15 to 21 of the GDPR (right of access, right of reply, right of erasure, right to limit the processing, right to data portability and right to object).

All complaints must be addressed directly to FAMC at the addresses and in the manner indicated in the general privacy policy at <https://chigiana.org/privacy/>, or to the competent supervisory authority on Italian territory (Italian Data Protection Authority).