

Privacy policy

Below we describe the modalities of management of the site fantaeurovision.com with reference to the treatment of the personal data of the users that use it. The web app of the game, reachable at app.fantaeurovision.com, has a specific privacy and cookie policy.

The Data Controller and Data Protection Officer

The Data Controller is **Mk2 srls** (hereinafter also the Data Controller or fantaeurovision.com), via Bruno Buozi, 46, Civitanova Marche (MC) and can be contacted by email at info@quellidifantasanremo.com. The Data Controller has appointed its own Personal Data Protection Officer who can be contacted at privacy@wslegal.it.

Place of personal data processing

The processing operations connected to the web services of this site take place at the premises of Mk2 srls, which makes use of external providers for the web site hosting service and are carried out by technical staff authorized to process the data and, occasionally, by external and internal staff for maintenance operations. Personal data will be stored on servers of the Data Controller, or its suppliers located within the territory of the European Union. Except as further indicated, the data will not be transferred outside the European Union.

Types of data processed

1. Data deliberately supplied by the user

The voluntary and explicit sending of e-mail messages to the addresses indicated in the various access channels of the site and the filling in of the forms specifically provided (e.g. contact form) entails the acquisition of the sender's e-mail address and data, which are necessary to respond to the requests made. Sending this data is done on an optional, explicit and voluntary basis, and involves the subsequent acquisition of the data transmitted: we will process this data assuming that it refers to the sender. Please do not send any personal data unless strictly necessary: certain categories of personal data can only be processed with the explicit consent of the user and in accordance with current legislation. Specific summary information will be reported or displayed on the pages of the site set up for particular services on request.

2. Navigation Data

The computer systems and software procedures used to operate the website fantaeurovision.com acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified interested users, but by their very nature could, through processing and association with data held by third parties, allow users to be identified. These data are used for the sole purpose of obtaining statistical information not associated with any user identification data on the use of the site and to check its correct operation and are deleted immediately after processing or within a few days at most. The data could be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the Site. This data is stored in our systems or in those of service providers, who act as data processors for the management of the website. The site is hosted on servers located in Europe.

3. System Log

The Access to the site, consultation of its contents and use of its services enables the web server to automatically record so-called 'system LOGs', i.e. information that the user's browser sends while

browsing the site. This information consists of the web pages requested by the user, the documents consulted, modified or created, the IP address, browser type, browser language, date and time of the request.

4. Statistical Data

Statistical analysis services allow us to monitor and analyze traffic data in order to measure the performance of the site for research purposes, usability evaluations and interest. This site uses Plausible Analytics (<https://plausible.io/>), a service for the statistical analysis of browsing activities. Plausible Analytics uses the user's personal data for the purpose of examining the use of this site and compiling statistical reports. Data processing takes place in Europe. Privacy policy Plausible Analytics: <https://plausible.io/privacy>.

5. Cookies

This section of the sites sends visitors some files commonly known as cookies. Cookies will be used by your computer's browser, solely to store the website user's session information. If you prefer not to receive cookies or wish to be informed about them in advance, you can set your web browser accordingly. However, we would like to inform you that without this active feature, you cannot access the forum section on the Company's websites correctly. For further information on cookies you can see Cookie policy.

Profiling by automated processing of personal data

Automated user profiling systems are not active for advertising purposes, aimed at analysing or predicting aspects of the user's browsing habits on the basis of the user's browsing activities.

Purpose and legal basis of data processing

We process personal data for different purposes, which we specify below:

1. Request management and service delivery

<u>Purpose of processing</u> In order to follow up any requests you may make of us, e.g. by spontaneously sending messages, e-mail or traditional mail to the addresses indicated on the site, which entails the subsequent acquisition of the sender's data, the sender's e-mail address necessary to reply to the request, as well as any other personal data included in the relevant communication.	<u>Legal basis and necessity of providing data</u> The processing is carried out in the context of the performance of a contract to which the user is party or the execution of pre-contractual measures taken at the user's request (Art. 6(1)(b) of the Reg. Ue 2016/679).
<u>Purpose of processing</u> For the fulfilment of obligations laid down in laws, regulations and national and/or EU legislation, as well as provisions issued by authorities empowered to do so by law or by supervisory and control authorities. Preventing or detecting any abuse in the use of the site, or any fraudulent activity, and thus allowing us possible protection in court.	<u>Legal basis and necessity of providing data</u> The processing is necessary to fulfil a legal obligation (Art. 6(1)(c) of the Reg. UE 2016/679).

2. Purpose of processing navigation data and system logs

Personal data whose transmission is implicit in the use of Internet communication protocols and system LOGs are processed solely for the purpose of obtaining anonymous statistical information on the use of the site, to check its correct operation and to protect the computer systems that enable it to function. The data do not permit the identification of the persons concerned and are not associated with other sources of data that could permit assimilation such as to identify users.

Obligation to provide personal data

Apart from that specified above for navigation data, the user is free to provide personal data for sending communications. Failure to provide them may make it impossible to obtain what has been requested or to carry out certain services, as specified below with reference to the above-mentioned purposes. The provision of personal data such as e-mail address and identified data is necessary for the pursuit of the management of requests and offer services, and any refusal to provide such data will result in the impossibility of satisfying the user's requests and for the latter to take advantage of the services available through the website.

Methods of processing

We process personal data by both automated and pseudo-automated means and for the time strictly necessary to achieve the purposes for which they have been collected and for the pursuit of the purposes set out in this policy. Processing is carried out by specially appointed personnel, mainly with the aid of electronic, computerized, or otherwise automated means, through the use of electronic mail or other remote communication techniques.

Data retention period

The personal data is retained for as long as is necessary to provide the requested service. Should you decide to delete your account, your data will be immediately deleted from our systems or anonymized for statistical purposes, except for LOG data and data necessary to ensure the security of the system and retention obligations prescribed by law or otherwise specified by the person concerned. In any case, we may process personal data for as long as permitted by law, as it may be necessary to protect our interests from possible claims or in the event of litigation.

Data security

We adopt specific security measures, appropriate and preventive, in order to safeguard the confidentiality, integrity, completeness and availability of personal data, as well as to prevent the loss of data, illicit or incorrect use and unauthorized access. In particular, the site uses an encryption system with SSL (Secure Sockets Layer) technology, which guarantees protection by encrypting information both on the login page and in the other sections where you can release, view or modify your personal data. In any case, we are not responsible for untruthful or incomplete information sent directly by the user (e.g. correctness of e-mail address), as well as information concerning the user that has been provided by a third party, even fraudulently.

Personal data recipients

For the provision and management of services, personal data may be communicated to other subjects, in their capacity as autonomous Data Processors and/or Data Controllers (such as, for example, web service providers, e-mail or technical services that provide services instrumental to the provision of site services, subjects that provide technical, administrative, legal, etc. assistance and consultancy in relation to the provision of services, internal staff authorized to process data

and bound by confidentiality obligations) to the extent necessary to carry out their duties for us, and have committed themselves to confidentiality, including with appropriate legal obligations. The data may also be disclosed to persons, entities or authorities for legal obligations, protection against abuse or fraud, or by order of the authorities. The full list of the subjects is available upon request.

Exercise of rights by users

The subjects to whom the personal data refer have the right at any time to obtain confirmation of the existence or not of the same from the Data Controller, to know the content and origin, to verify their accuracy or ask for their integration, the cancellation, updating, rectification, transformation into anonymous form or blocking of personal data processed in violation of the law, as well as opposing in any case, for legitimate reasons, their processing. Requests should be addressed to the Data Controller who can be contacted at info@quellidifantasanremo.com. You can also lodge a complaint with the Data Protection Authority (www.garanteprivacy.it).

Changes and updates

We reserve the right to change or update the content of this privacy policy in connection with changes in applicable law. All changes and updates will be binding as soon as they are published on the site.

Last update: 03/03/2022