#### Information on the processing of personal data pursuant to Articles 13 and 14 of EU Reg. n. 679/2016

Aulos APS collects and uses your personal data when you browse or use the online services on <u>app.various-voices.it</u>.

By personal data we mean any information that can be used to identify an individual.

The purpose of this policy is to provide you with a clear and detailed explanation of how, when and why we collect and use personal data, and it is designed to give you a simple and transparent explanation of our data protection policy, as well as to show you how to effectively exercise your rights.

This information refers only to the data processed by Aulos APS through this website and does not concern other websites, platforms or social network pages that may be reached through links on <a href="app.various-voices.it">app.various-voices.it</a>: in these cases, you should always refer to the information available on the respective pages.

This information may be subject to changes and variations over time, so we invite you to regularly consult this page to be updated on the processing of personal data carried out by Aulos APS.

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#### 1. Who is the Data Controller?

Aulos APS (C.F. 91426780374) is the Data Controller, as it determines the means and purposes of the processing of personal data involved in the use of this website; for further information, please use the contact details given in the section "How can I contact the Data Controller?".

### 2. How can I contact the Data Controller?

You can with the Data Controller by sending a communication to the following:

- mail: Via Capo di Lucca n. 37, 40126, Bologna;
- e-mail: info@various-voices.it;
- PEC: aulosaps@pec.it.

## 3. When do you collect my data?

Aulos APS will collect information directly provided by you:

- when you access and navigate the site;
- when you send questions or ask for advice through the dedicated sections or contacts;
- when you use the features of the site, such as registering an account, signing up for the Various Voices 2023 event or uploading photos and contents;

#### 4. What kind of data do you process? For what purposes and on what legal basis?

When you browse or use the services on the Aulos APS website, the following types of data may be processed:

## a) Navigation data

Some personal data whose transmission is implicit in the navigation on this website are acquired by the computer systems that allow its proper functioning, including but not limited to data traffic and concerning the location, weblog and other data regarding the resources you access through your device. Although this information is not collected to be associated with identified data subjects, it could allow users to be identified - by its very nature and through processing and association with data held by third parties. For example, navigation data include IP addresses or domain names of computers used by users who connect to the Site, the addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response given by the server and other parameters relating to the operating system and browser used.

- <u>Purpose of the processing</u>: allow you to browse the website safely and correctly;
- <u>Legal basis for the processing</u>: the legitimate interest of Aulos APS in the proper functioning of the site and the safety of navigation, regularly balanced with the rights of the person concerned (art. 6, paragraph 1, lett. f, GDPR).

### b) Data voluntarily provided by the user (Request for information through the indicated addresses)

You can contact us at the addresses indicated on the site, as well as through the mailto links incorporated on the site, to request information or assistance; this involves the acquisition of the data required to identify the request (your e-mail address and the information you decide to include in the text of the message) and authorizes us to send you any reply communications using the contact details you provided at the time of the request.

- <u>Purpose of processing</u>: ensure adequate support in relation to your needs and to respond to your requests;
- <u>Legal basis for the processing</u>: the provision of the service you have requested (art. 6, paragraph 1, lett. b, GDPR).

## c) Data voluntarily provided by the user (registration and access to personal account as Choir Leader) You can create a personal account by filling out the form on the Site.

The user's personal data and/or those that identify him/her (name, surname and e-mail address) are collected for the registration and the access to the restricted area,. The password will be chosen by the user and can always be freely changed, following the security features set by the Data Controller (for example, number and type of characters used).

You can always manage your information by making a specific request to the Data Controller, or through the appropriate section of the site.

By using the contact details indicated in section 2 (*How can I contact the data controller?*), or through the procedures on the site, to which reference should be made, you will also have the possibility at any time to cancel your account and all data stored therein. Some data may still be retained by Aulos APS for the periods of time required by applicable law.

After deletion of your account, only the data related to the registration of your requests, enrollment and cancellation will be retained in order to demonstrate the proper fulfillment of legal obligations by the Data Controller.

- Purposes of the processing: provide the services requested by the Data Contoller, including the registration to Various Voices 2023 and ensure the possibility to upload content related to their choir;
- <u>Legal basis for the processing:</u> to execute the contractual relationship of which the person concerned is part (art. 6, paragraph 1, lett. b GDPR).

### d) Data voluntarily provided by the user (pre-registration to the event Various Voices 2023)

Once your personal account has been created, the information related to your identification and contact details will be stored in your page. You will be able to decide to add further information, necessary for the registration to Various Voices 2023. It is about your personal data (for example, your fiscal code, address, city

and state of residence, telephone number, the existence of needs related to disability conditions), information related to your choir (name of the choir, number of choristers and eventual special needs), the preference of languages to communicate with, the data necessary to invoice the costs of the registration to Various Voices 2023 and the identification data and contact details of the choir's referents. Before including information related to third subjects, please be sure to acquire their consent. In any caso, the communication of information regarding such subjects will take place under the responsibility of the person who communicates them.

In relation to this service, you will receive via e-mail the confirmation of the pre-registration to the event and all the information required to proceed with the payment.

In order to complete the registration to Various Voices 2023, the Data Controller will have to receive from the association Legato or Gala the confirmation that the choir is among their members. These organizations, as well as any legal persons who manage the choirs, could pursue aims of an ideal, social and political nature. Therefore, the affiliation to such organizations - requested only and exclusively in order to complete the registration to the event – could incidentally involve the processing of data belonging to particular categories related to political opinions or philosophical beliefs.

In case one of the choirs is not enrolled in the associations Legato or Gala, it will be contacted by these associations in order to proceed with the membership and to finalize the registration to the event Various Voices 2023.

- <u>Purposes of the processing:</u> allow you to pre-register for the event Various Voices 2023;
- <u>Legal basis for the processing:</u> the provision of the services you requested and the execution of a contractual relationship to which the person concerned is part (art. 6, paragraph 1, lett. b GDPR). In case of processing of data belonging to special categories, the consent of the user (art. 9, paragraph 2, lett. a GDPR).

# e) Data voluntarily provided by the user (descriptions, links to social media profiles and contents related to the choir)

Once the registration to Various Voices 2023 has been completed, the personal account can be used to communicate to the Data Controller contents related to the choir, such as descriptions of the choir, its history and activities, as well as to indicate links to the choir social media profiles and videos of performances. The user acknowledges that by communicating this information, he authorizes the Data Controller to use it and, in particular, to publish it on the website www.various-voices.it, as well as on other possible online spaces available to the Data Controller related to Various Voices 2023. This information and images could be used for the production of brochures, leaflets and other informative materials for advertising purposes.

The user declares to be aware that the communication of the information takes place under his responsibility and, to this end, he declares to (i) have informed the data subject and, where necessary, acquired their consent in a documented way; (ii) to be the owner of the right to communicate and authorize the use of such information, guaranteeing, indemnifying and holding harmless the Data Controller for any claims of third parties related to or occasioned by the use of the communicated information; (iii) to consent to the use by the Data Controller of the information and images, in the terms described above.

- <u>Purposes of the processing</u>: make the choir to which you belong to be known, through the publication of information, links and videos in spaces available to the data controller and/or advertising material;
- <u>Legal basis for the processing:</u> the provision of the service you have requested and the performance of a contractual relationship to which the data subject is a party (art. 6, paragraph 1, lett. b GDPR).

#### f) Data voluntarily provided by the user (photo upload)

After the registration to Various Voices 2023, the personal account can be used to upload photos of the choir. By uploading these pictures, the user, under his personal responsibility, authorizes the Data Controller to use them: in particular, to publish them on the website www.various-voices.it, as well as on other possible online spaces available to the owner related to Various Voices 2023, and to use them for the production of brochures, leaflets and other advertising materials.

The user declares to be aware that the transmission of the images takes place under his responsibility and, to this end, he declares to (i) have acquired the consent of the data subject in a documented way (ii) to be the holder of the right to communicate and authorize the use of such information and images, guaranteeing, relieving and holding the Holder harmless for any claim of third parties related to or occasioned by the use of the images; (iii) to agree to the use by the Data Controller of the images, in the terms described above.

- Purposes of the processing: make the choir to which you belong to be known, through the publication
  of images in spaces available to the data controller and / or advertising material;
- <u>Legal basis for the processing:</u> the provision of the service you have requested and the performance of a contractual relationship to which the data subject is a party (art. 6, paragraph 1, lett. b GDPR).

## g) Cookies

What are cookies? A cookie is a small text file that stores brief information about your browsing on a particular website and is installed on your device when you log in. Each cookie contains various data (e.g., the name of the server it comes from, a numeric identifier, etc.), may remain on your system for the duration of a session (until you close your browser) or for long periods, and may contain a unique identifier. When you visit the site again, they will be redirected to the site that generated them (first-party cookies) or to those provided by third parties able to recognize them (third-party cookies).

<u>What are they for?</u> Aulos APS would like to reassure you about the security of the cookies on its website: they do not damage your device in any way, but they will allow you to navigate faster, giving you a better experience. Cookies are used for different purposes depending on their type.

What type of cookie is present? On the site of Aulos APS, in particular, may be activated technical and functional cookies (which do NOT require your consent). These cookies are necessary for the functioning of the site and allow you to access its functions (so-called navigation cookies) or to authenticate the session. There is also the use of functional cookies, which allow you to store your preferences and settings, thereby improving your browsing experience on the site.

To ensure their functionality, these cookies are not deleted when you close the browser. However, they have a fixed duration (usually up to a maximum of 2 years) and after this period they are automatically deactivated. These cookies and the data they collect will in no way be used for any further purposes.

The installation of technical cookies occurs automatically after accessing the site or to activate certain features (e.g. by selecting the "remember me" option). At any time you can decide to disable them by changing the settings of your browser: but in this case you may experience some problems in viewing the site.

- Purposes of the processing: ensure the proper functioning and security of the site;
- <u>Legal basis for the processing</u>: exception to the need for user consent, allowed by art. 122 of Legislative Decree 196 of 2003 (art. 6, paragraph 1, lett. c, GDPR).

#### Which cookies are used?

COOKIE NAME: .AspNetCore.Antiforgery.#

PROVIDER: app.various-voices.it

PURPOSE: To help prevent CSRF (Cross-Site Request Forgery) attacks.

PLACE OF TREATMENT: The Netherlands

EXPIRY: Session. TYPE: HTTP

COOKIE NAME: \_grecaptcha PROVIDER: app.various-voices.it

PURPOSE: This cookie is used to distinguish between humans and robots. This is useful for the website, in order to make valid reports on the use of the site.

PLACE OF PROCESSING: United States

**EXPIRY:** Persistent.

TYPE: HTML

COOKIE NAME: \_GRECAPTCHA

PROVIDER: google.com

PURPOSE: This cookie is used to distinguish between humans and robots. This is useful for the website in

order to render valid site usage reports. PLACE OF PROCESSING: United States

EXPIRY: 179 days

TYPE: http

MORE INFORMATION: https://policies.google.com/privacy

COOKIE NAME: rc::a
PROVIDER: google.com

PURPOSE: This cookie is used to distinguish between humans and robots. This is useful for the website in

order to render valid site usage reports.
PLACE OF PROCESSING: United States

EXPIRY: Persistent TYPE: HTML

MORE INFORMATION: https://policies.google.com/privacy

COOKIE NAME: rc::b PROVIDER: google.com

PURPOSE: This cookie is used to distinguish between humans and robots.

PLACE OF PROCESSING: United States

EXPIRY: Session TYPE: HTML

MORE INFO: https://policies.google.com/privacy

COOKIE NAME: rc::c PROVIDER: google.com

PURPOSE: This cookie is used to distinguish between humans and robots.

PLACE OF PROCESSING: United States

EXPIRY: Session TYPE: HTML

MORE INFO: https://policies.google.com/privacy

#### Disabling via browser

From the site http://www.youronlinechoices.com/it/ it is possible not only to acquire further information on cookies, but also to check the installation of cookies on your browser/device and also to disable them.

Commonly used browsers (e.g., Internet Explorer, Firefox, Chrome, Safari) accept cookies by default, but this setting can be changed by the user at any time. This applies to both PCs and mobile devices such as tablets and smartphones: it is a generally and widely supported feature.

Therefore, cookies can easily be deactivated or disabled by accessing the options or preferences of the browser used and generally only third party cookies can be blocked; in general, these options will only take effect for that browser and on that device, unless options are active to unify preferences on different devices. Specific instructions can be found on the options or help page of the browser itself. Disabling technical cookies, however, may affect the full and/or proper functioning of various sites, including this Site.

As a rule, the browsers used today:

offer a "Do not track" option, which is supported by some (but not all) websites. As a result, some websites may no longer collect certain browsing data;

- offer the option of anonymous or incognito browsing: this means that no data will be collected in the browser and no browsing history will be saved, but browsing data will still be collected by the operator of the website visited;
- allow the deletion of all or part of the stored cookies, but on a new visit to a website they might be
  installed.
- We indicate the links to the support pages of the most popular browsers (with instructions on how to disable cookies on these browsers):
  - Firefox (https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie);
  - Internet Explorer and Microsoft Edge: (<a href="https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies">https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies</a>);
  - Safari: (iOS) on Mac (<a href="https://support.apple.com/it-it/guide/safari/sfri11471/mac">https://support.apple.com/it-it/guide/safari/sfri11471/mac</a>) and
  - mobile devices (<a href="https://support.apple.com/it-it/HT201265#:~:text=To%20delete%20the%20cookies%20without,or%20disable%20private%20 browsing">https://support.apple.com/it-it/HT201265#:~:text=To%20delete%20the%20cookies%20without,or%20disable%20private%20 browsing</a>);
  - Chrome: desktop: https://support.google.com/chrome/answer/95647?hl=it; Android and iOS <a href="https://support.google.com/chrome/answer/2392971?hl=it">https://support.google.com/chrome/answer/2392971?hl=it</a>).

## 5. For what further purposes can you use my data?

Your personal data may also be used in order to:

- a) comply with legal obligations and requests from public or governmental authorities;
- b) manage any disputes or litigation and therefore defend the rights of Aulos APS both in and out of court.

In such cases, the legal bases of the treatment will be:

- for point a), the fulfillment of a legal obligation (art. 6, paragraph 1, letter c, GDPR);
- for point b), the legitimate interest of the Data Controller in the protection of its rights, provided that
  it is adequately balanced, from time to time, with the rights of the data subject (art. 6, paragraph 1,
  lett. f, GDPR).

#### 6. With whom will you share my data?

For the purposes set out in the previous sections, members of Aulos APS may be instructed to process your data in order to provide you with the services, information or support you request.

Therefore, access to your personal data will be expressly authorized by the Data Controller, who, if necessary, may appoint subjects in accordance with Articles 28 and 29 of the GDPR.

We would also like to remind you that the list of authorised subjects and data processors is available at the registered office of the Data Controller or, alternatively, you can request it using the contact details indicated in the section "How can I contact the Data Controller?".

#### 7. How will you treat my data?

Your personal data will also be processed with the aid of electronic means for the time strictly necessary to achieve the purposes intended at the time of their collection.

Aulos APS will take appropriate technical and organizational measures to prevent loss, illegal or incorrect use of data, as well as to prevent possible unauthorized access by third parties. Therefore, Aulos APS will protect the security of your personal data, limiting the number of persons who will be allowed access to servers or databases and providing protection systems to limit the risk of cyber attacks.

### 8. Are my data processed outside Europe?

The data processed by Aulos APS reside in servers located within the European territory. However, some providers of cookie services may be based in non-European countries. In these cases, the processed data will

usually reside in servers located in the European territory, but in some cases there may be a communication of some data to the headquarters of the provider. In these cases, personal data will still be processed in compliance with European legislation. The transfer of data, in particular, will only take place in compliance with the provisions of Articles 45 et seq. of the GDPR. Therefore, all necessary precautions will be taken in order to ensure the most complete protection of personal data basing such transfer: a) on adequacy decisions of the third country recipients expressed by the European Commission; b) on adequate guarantees expressed by the third party recipient pursuant to art. 46 of the Regulation; c) on the adoption of corporate binding rules. These requirements are always guaranteed by Aulos APS service providers.

## 9. How long will you keep my data?

Aulos APS will process your personal data for the reasonably necessary time to achieve only the purposes listed above, which can be found in the Sections "What data do you process? For what purposes and on what legal basis?" and "For what further purposes may you use my data?".

At the end of the retention period, your personal data will be deleted or irreversibly anonymized and aggregated.

## 10. What are my rights and how can I protect my privacy?

In relation to your personal data and in accordance with the GDPR, Aulos APS informs you that you have the right to request:

- access to your data;
- the modification and rectification of any errors in our databases relating to your data;
- The cancellation of your data if they are held in the absence of the legal prerequisites;
- the limitation of the processing of your data;
- opposition to the processing of your data;
- the portability of your data.

Any templates and more information are also available here: <a href="https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924">https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924</a>. In the following table we explain in detail how to exercise your rights:

YOUR RIGHT	HOW CAN YOU EXERCISE IT?
Access	<ul> <li>Ask for confirmation about any processing concerning your personal data;</li> <li>Obtain a copy of your data;</li> <li>Ask for other information about your personal data that is not already in this policy;</li> </ul>
Rectification	You may request rectification of inaccurate or incomplete personal data.  Before proceeding with rectification, we will verify the accuracy of the data in our files.
Right to erasure/to be forgotten	<ul> <li>You can request the deletion of your personal data, but only if:</li> <li>Their existence is no longer necessary in relation to the purposes for which they were collected;</li> <li>You have revoked your consent (where processing is based on consent);</li> <li>The processing has been carried out in an unlawful manner;</li> <li>Data retention is not necessary to comply with a legal obligation to which Aulos APS is subject or in relation to an order from an Authority.</li> </ul>
Limitation	You may request to limit the use of your personal data in the event that:  • Their accuracy has already been disputed;  • The data is no longer necessary for the purposes for which it was collected, but there is a legal challenge to its use;  Following your request for a restriction, the use of your personal data is nevertheless permitted when:  • Your consent still remains;  • It is necessary to exercise or resist legal proceedings or to protect the rights of another person or entity involved in the processing.
Portability	You may request a copy of your personal data in a structured, readable and commonly used format.

YOUR RIGHT	HOW CAN YOU EXERCISE IT?
Opposition	<ul> <li>You can object at any time to the processing of personal data about you when: <ul> <li>the basis of lawfulness of the processing is the legitimate interest of the owner;</li> <li>the personal data are processed for direct marketing purposes, including profiling related to such direct marketing.</li> </ul> </li> <li>When you object: <ul> <li>to processing for direct marketing purposes, the personal data will no longer be processed for such purposes;</li> <li>in case of legitimate interest of the data controller, the processing may continue only if it is demonstrated the existence of a compelling legitimate ground to proceed with the processing that overrides the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of a right in court.</li> </ul> </li> <li>You can also exercise the right to object by automated means using specific techniques, such as those made available on the site in the personal page and e-mail (link for cancellation).</li> </ul>

Aulos APS guarantees that any request concerning your rights will be answered within thirty days of receipt.

### 11. Can I file a complaint?

You have the right to lodge a complaint with the Authority for the protection of personal data, if you believe that the treatment carried out by Aulos APS does not comply with the requirements of the European Regulation No. 679/2016 and national legislation.

In Italy, the competent authority is the **Garante per la protezione dei dati personali**, whose contact details are available at <a href="http://www.garanteprivacy.it/">http://www.garanteprivacy.it/</a>.

More information and the sample document to be used for the complaint are available here: https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524.

In addition, if the prerequisites set out in Articles 78 and 79 of the GDPR are met, you have the right to bring an appeal before the competent judicial authority.

## 12. Changes

The information we are providing you with now may change over time, when processing activities change, when data is collected or when legislative or regulatory changes occur, as well as when technological developments occur. We therefore advise you to periodically consult this page to keep up to date on the processing carried out.