

Dear Customer,

Anteprima Srl owns the brand Eppela, a crowdfunding platform, hereinafter simply "the company". In its management of the Eppela platform, the company collects, processes, and communicates the personal data of its users, hereinafter also simply "the interested parties," who register to the Platform www.eppela.com , to whatever ends.

The platform has offices in Italy and is thus subject to Italian state law. The company Anteprima Srl acts in full respect of EU Regulation n°679/2016 (hereinafter shortened to: GDPR) and, in compliance with its standards, provides all indications on the processing of your personal data and your rights through this policy.

Before giving your consent to data processing, please read this information carefully.

1. PERSONAL DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data controller (that is, the person who is responsible for decision-making regarding personal data processing, security and tools used) is Anteprima Srl, with offices in Lucca 55100 - Piazza dei Servi n° 11, VAT n° 01837640463 represented by its legal representative Nicola Lencioni, domiciled for the appointment at the company's registered offices.

2. PERSONAL DATA PROTECTION OFFICER

The personal data protection officer, also known with the acronym DPO, is the person to contact for the modification/management of your data. This person supervises compliance with personal data regulations and cooperates with the regulatory authorities (personal data protection authority). Specifically, their duties involve support and monitoring, consultation, training and information in relation to Regulation application.

The data protection officer has not been appointed.

3. PURPOSE OF PROCESSING AND LEGAL BASES

The interested party's personal data (that is, the data which they provide registering to the Eppela platform) are provided to Anteprima Srl, and processed by the latter, possibly through communication to third parties when necessary and instrumental, to the following ends:

- a. for objectives closely connected and instrumental to the execution of the obligations deriving from relations, including contractual ones, established with Anteprima, to allow for and manage your registration to the platform, to use the services offered and for the administrative, accounting purposes and to fulfil the obligation provided for by the regulations in force as according to art.6 b) GDPR

- b. to fulfil obligations, of any sort, provided for by the law, regulations, EU standards or otherwise connected to obligations deriving from provisions issued by judicial authorities, administrative officers or police forces, those authorised by the law or by monitoring and supervisory bodies as according to art. 6 c) GDPR;
- c. for objectives connected to Anteprema Srl's asserting or defending a right in a court of law as according to art. 6 c) GDPR. Authorisation for the objectives as according to the previous points a) b) and c) is mandatory; denying consent could make it impossible for Anteprema Srl to provide services and/or fulfil obligations originating from the relations established through the Eppela platform. The processing of your personal data is founded on the legal bases of the interested party's consent as selected during registration and subsequently through the acceptance of the platform's general regulations. This processing, furthermore, satisfies the data controller's legitimate interests, such as: contract performance, invoicing, recovering receivables. Consent to processing your data for the following different objectives, which are necessary for Anteprema Srl's work as according to art. 6 a) GDPR should be considered optional and, thus, denying consent will not impede the issuing of the services provided by Anteprema Srl through the Eppela platform. The relative processing requires the interested parties' consent;
- d. for marketing and/or, in any case, promotional purposes via automated (SMS, MMS, e-mail, fax) or traditional systems (mail, telephone call);
- e. for communications with third-party companies that consequently process the data and may use the them for marketing and/or, in any case, promotional purposes;
- f. for profiling and/or analyses correlated with market and/or statistical research. The processing of your personal data is founded on the legal bases of the interested party's consent as selected during registration.

4. SENSITIVE DATA

Sensitive data is, as according to art. 9 GDPR, all data "...disclosing race and ethnicity, religious, philosophical or other types of beliefs, political opinions, membership of political parties, trade unions, associations or religious, philosophical, political or trade-union organisations, as well as personal data suitable for revealing the health, sex life or sexual orientation" of the Interested party.

These data are never gathered by Anteprema, but should this occur, Anteprema will process them exclusively following the Interested party's specific, explicit expression of consent, issued in writing, as according to and pursuant to art. 9, paragraph 2a) GDPR.

5. PROCESSING METHODS

The Interested Party's personal data collected for objectives directly connected to issuing the services provided through the Eppela platform will be processed by internal and external employees and collaborators of Anteprema Srl, who have been officially appointed as according to art. 4 GDPR as people with formal authorisation to perform personal data processing.

Processing may occur through manual, IT and/or electronic systems, which may be automated, in compliance with regulations, and principles of lawfulness and correctness, through the most suitable means to the ends of protecting security and confidentiality; They will be communicated to third parties only where strictly necessary.

Anteprema Srl will not gather any data from the Facebook profile of the interested parties, except their name and profile photo to the ends of identification on Eppela. Likewise, no data shared by the interested party on Eppela will be transferred to Facebook without the interested party's specific authorisation.

6. COMMUNICATION WITH THIRD PARTIES

Anteprema Srl, in compliance with all that provided for at the previous points, communicates the data of interested parties to:

- the creators in order to allow the same to fulfil their obligations towards the interested parties/sponsors;
- consultancy service providers external to the company, for example, legal, tax and similar consultancy firms and/or the suppliers of IT services which Anteprema Srl may make use of in their work through the Eppela platform;
- third parties to the ends of detecting the degree of satisfaction of the quality of the services supplied through the Eppela platform, and/or market research processing, and customer profiling. Your personal data may be transferred abroad, within the European Union or, if outside, providing appropriate guarantees as according to articles 46, 47 or 49 of Regulation 679/2016.

7. PERSONAL DATA RETENTION TIME AND CRITERIA USED

The personal data which you communicate and which we gather will be stored for 10 years from the last time you log in to the platform, unless they are necessary for fulfilling legal obligations deriving from exercising rights before judicial bodies or on the request of an authority.

Any data processed, on your specific consent, to the ends of marketing and/or profiling, will be processed for a maximum period of 24 months.

8. RIGHTS OF THE INTERESTED PARTY

Regulation 679/2016 acknowledges you the following rights which you may exercise against the Data controller. Hereinafter is a complete extract of the legal articles.

Your requests regarding rights and/or any information and request for explanations you may require may be forwarded in writing to the Data controller/data protection officer, via ordinary mail to the address Anteprema Srl, Lucca 55010, Piazza dei Servi 11, or via email to the address privacy@eppela.com.

8.1 THE RIGHT TO ACCESS

Art. 15 of the EU Regulation consents you to obtain confirmation from the data controller regarding whether your data is being processed and if so to obtain access to these data.

8.2. RIGHT TO RECTIFICATION

Art. 16 of the EU Regulation consents you to rectify incorrect personal data about you without an unjustified delay. Considering the purpose of the processing, the interested party has the right to integrate incomplete personal data, possibly providing a supplementary declaration.

8.3. RIGHT TO ERASURE

Art. 17 of the EU Regulation consents you to get your personal data erased by the data controller without an unjustified delay if one of the grounds provided for by the regulation exists.

8.4. RIGHT TO RESTRICTION

Art. 18 of the EU Regulation consents you to get the data controller to restrict processing when one of the hypotheses provided for by the EU Regulation exists.

8.5 RIGHT TO PORTABILITY OF DATA

Art. 20 of the EU Regulation consents you to get a copy of the personal data you provided to the data controller in a structured, commonly used, machine-readable format and gives you the right to transmit these data to another controller without impediments from the data controller you provided them to.

Furthermore, it consents you to obtain the direct transmission of personal data from one data controller to another, if technically feasible.

8.6 RIGHT TO OBJECT

Art. 21 of the EU Regulation consents you to object, at any time, on grounds connected to your specific situation, to the processing of your personal data, as according to article 6, paragraph 1, letters e) or f), including protraction based on these provisions.

8.7. RIGHT TO WITHDRAW CONSENT

Art. 7 of the EU Regulation consents you to withdraw your consent at any time. Withdrawing consent does not prejudice the lawfulness of the processing based on the consent given before withdrawal.

8.8. RIGHT TO COMPLAIN

Art. 77 of the EU Regulation, should you believe the processing of your data violates the Regulation, acknowledges you the right to complain to a regulatory authorities (personal data protection authority), namely in the member state where you reside, work or where the alleged violation occurred.

This policy will be subject to updates and thus all Platform Users are asked to periodically visit this page in order to stay updated as to the means of the processing of personal data on the Eppela Platform.

Data controller
Anteprima Srl