

## **PRIVACY POLICY** for the processing of the Musicians' personal data

Dear Sir/Madam,

candidate, in compliance with the instructions of the Regulation (EU) 2016/679, hereunder simply referred to as 'Regulation', the processing of your personal data shall abide by the principles of lawfulness, fairness and transparency, so as to protect your privacy and rights. Therefore, we hereby provide you with the information concerning the data processing as regards to the participation in the selection of young musicians promoted within the ESYO project by the cultural association Scuola per Giovani Musicisti Europei, hereunder referred to as 'Association'.

### **1. DATA CONTROLLER**

In compliance with Articles 4 and 24 of the Regulation (EU) 2016/679, the data controller is the cultural association Scuola per Giovani Musicisti Europei

### **2. CATEGORIES OF DATA**

The subjects partaking in the selection and in the following activities shall have their personal data processed with respect to: name, surname, email address, date of birth, home address, phone number and photographic, visual and audio recordings needed to produce the podcasts provided for the selection. Some of the special categories mentioned by Article 9 of the Regulation are to be processed only when strictly necessary, e.g. information about dietary needs due to health issues or allergies when the activities require to sojourn and eat in external facilities.

### **3. PURPOSES AND LAWFULNESS OF DATA PROCESSING**

In accordance with the lawfulness conditions referred to by points (a) and (b) of Article 6 of the Regulation (EU) 2016/679, the personal data provided by the subjects within the ESYO project shall be processed for the purposes mentioned in Article 4 of the Statute of the Association, namely the "Promotion and circulation of music pedagogy and the study of musical instruments with particular reference to younger students".

**Associazione culturale SCUOLA PER GIOVANI MUSICISTI EUROPEI**

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segreteria@esyo.eu  
Codice fiscale: 90049860324  
[www.esyo.eu](http://www.esyo.eu)

#### 4. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

As mentioned in Article 28 of the Regulation (EU) 2016/679, the personal data provided may be transmitted to recipients, which are to act as processors and/or as natural persons operating under the authority of the Data Controller and the Data Processor and complying with their contracts or related purposes. By way of example, the data may be transmitted to recipients that belong to the following categories: insurance companies, credit institutions, operators of the IT system, hosting providers for the website, firms or companies providing assistance or consultation, competent authorities in the context of legal obligations and/or instructions issued by public authorities, when required.

Subjects belonging to the aforementioned categories may act as Data Processors or operate autonomously as additional Data Controllers.

Data in the form of visual and/or audio contents recorded on the occasion of public events may be published on the website of the project or on the social media of the Association. Or, on printed media.

#### 5. TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS

The personal data provided by the data subjects shall not be transferred to third countries either outside or inside the European Union.

#### 6. MODALITIES OF DATA PROCESSING

The data processing includes the procedures mentioned by Article 4(2) of the Regulation (EU) 2016/679, namely collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. The personal data are processed both on paper and through digital and/or automated means.

#### 7. DURATION OF STORAGE

The data shall be processed automatically and/or manually by specifically designated individuals using methods and means meant to guarantee the utmost confidentiality and security.

In compliance with the contents of point (e) of Article 5(1) of the Regulation (EU) 2016/679, the personal data shall be kept in a form which permits identification of the data subjects for no longer than 10 years after the subject leaves the ESYO project, so as to be able to confirm curricular information for the duration of such given time

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## 8. MODALITIES OF COLLECTION AND REFUSAL

Providing personal data for the purposes hereby stated in point 3 of this document is necessary in order to participate in the orchestral selection. The use of photographic, visual and/or audio files for the Association's promotional activities on paper and/or in digital form on the internet and/or social media needs the data subject's consent.

## 9. RIGHTS OF THE DATA SUBJECTS

The data subjects may enforce their rights, as stated by Articles 15-22 of the Regulation (EU) 2016/279, by contacting the Data Controller via email at [segreteria.esyo@gmail.com](mailto:segreteria.esyo@gmail.com).

At any given moment, the data subjects shall have the right to:

1. obtain confirmation as to whether or not personal data concerning them are being processed, even when the data are not stored yet, and be provided with such data in a clear and understandable form;
2. access the following information:
  - the source of the personal data;
  - the purposes and modalities of the data processing;
  - the logic involved in automated decision-making when using digital means of processing;
  - the contact details of the Data Controller, the Data Processors and the designated representatives, as stated in Article 5(2) of the Italian Privacy Code and Article 3(1) of the GDPR;
  - the individuals and categories of individuals to whom the data may be transferred or that may come into contact with the data on account of their role as designated representatives within the Italian territory, processors or officers
3. obtain:
  - the update, the rectification or, if the subject has an interest in requesting it, the integration of the data;
  - the erasure, the adaptation into an anonymous form or the restriction of unlawfully processed data, including cases in which the storage of the data is not necessary as regards to the purposes of the collection and processing;
  - proof that the data recipients were made aware of the procedures mentioned by points (a) and (b) and their contents, unless the provision of information proves to be impossible or would involve a disproportionate effort;
4. object, either completely or partially, to:
  - the processing of their personal data, for legitimate reasons, although concerning the purposes of the collection;

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- the processing of their personal data for direct marketing purposes, including advertising, direct selling, market research and marketing communications, by means of automated call systems, email or traditional marketing modalities such as telephone and/or mail.

5. If relevant, the other rights stated in Articles 16-21 of the GDPR apply (right to rectification, right to erasure, right to restriction of processing, right to data portability, right to object).

Without prejudice to any other administrative and judiciary appeal, were the data subjects to believe that the data processing transgresses the provisions of the Regulation (EU) 2016/679, the data subjects have the right to appeal to the Data Protection Authority in accordance with point (f) of Article 15 of the aforementioned Regulation and to revoke their consent at any given time in accordance with point (a) of Article 6(1) and point (a) of Article 9(2).

When data subjects request data portability, the Data Controller shall provide them with the personal data that concern them in a readable and commonly used format, without prejudice to commas (3) and (4) of Article 20 of Regulation (EU) 2016/679.

Date and place of signing

The Data Controller

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**CONSENT FORM FOR THE PROCESSING OF PERSONAL DATA, PHOTOGRAPHIC, VISUAL AND AUDIO RECORDINGS AND WAIVER FOR USE OF IMAGES AND AUDIO**

The undersigned,

Full name \_\_\_\_\_

Place of birth \_\_\_\_\_

Home address \_\_\_\_\_

TIN/FiscalCode \_\_\_\_\_

ID nr. \_\_\_\_\_

as parent or legal guardian of the data subject, \_\_\_\_\_, upon reading and understanding the privacy policy attached to this form, in accordance with Article 13 of the GDPR, hereby consents to the data processing as follows:

YES	NO	use of visual and audio recordings for the purposes stated in the privacy policy as regards the promotional activities of the association.
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Additionally, the undersigned hereby

**CONSENTS,**

without any compensation and without any temporal limitations, in accordance with Articles 10 and 320 of the Italian Civil Code and Articles 96-97 of Italian Law No. 633 of April 22, 1941, for the Protection of Copyright and Neighbouring Rights, to the publication and/or distribution, in any shape or form, of the visual and audio recordings concerning the data subject, on the website of the association Scuola per Giovani Musicisti Europei, on paper and/or on any other media, and also gives their permission for the storage of the photographic, visual and audio recordings in the digital archives of the association Scuola per Giovani Musicisti Europei, acknowledging that the purpose of the aforementioned publication is merely informative and possibly promotional.

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This waiver/authorisation may be revoked at any given time in writing either by ordinary mail or by email to the following address: [segreteria.esyo@gmail.com](mailto:segreteria.esyo@gmail.com).

### **Declaration**

The undersigned, aware of the administrative and penal consequences for providing false declarations, in accordance with DPR 245/2000, declares that the choice/request have been made within the meaning of the provisions on parental responsibility of Articles 316, 337-ter and 337-quater of the Italian Civil Code, which establish that both parents are required to give their consent.

Date and place .....

Signature \_\_\_\_\_

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