PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 (GDPR)

“UrbansKIN” PROJECT – INTERNATIONAL SKETCHBOOK ARCHIVE

1. Data Controller

The Data Controller is **Kineton S.r.l. Società Benefit**, with its registered office at Via Gianturco No. 23, 80123 Naples, Italy (hereinafter referred to as the “Data Controller” or “Kineton”).

2. Categories of Personal Data Processed

Within the scope of the **“UrbansKIN” Project** and the related donation of sketchbooks, the Data Controller processes the following categories of personal data relating to the donating artists:

- identification data (first name, last name, date and place of birth);
- any artistic name or tag used by the artist to sign their works;
- contact details (e-mail address, telephone number, residential address);
- biographical and professional information voluntarily provided by the artist in the presentation form (professional biography, list of the artist’s most representative works);
- images and contents of the donated materials (sketchbooks, drawings, notes), insofar as they may contain personal data relating to the artist.

3. Purposes and Legal Basis for the Processing

Personal data are processed for the following purposes:

a) managing participation in the call, collecting and cataloguing the donated Materials, on the basis of the performance of the agreement entered into with the artist through the application form (Article 6(1)(b) GDPR);

b) exhibiting the Materials and the artist’s biographical profile during the inaugural exhibition and any subsequent exhibitions, as well as publishing and disseminating them through Kineton’s communication channels (website, social media, printed materials), on the basis of the artist’s consent expressed in the application form (Article 6(1)(a) GDPR);

c) cataloguing the Archive and making it available for consultation, both in physical and digital format, by interested third parties (researchers, students, and professionals in the field), on the basis of the artist’s consent expressed in the application form (Article 6(1)(a) GDPR);

d) complying with any applicable legal obligations (Article 6(1)(c) GDPR).

The provision of personal data is necessary in order to participate in the Project. Failure to provide such data will make it impossible to participate in the call or to include the Materials in the Archive.

4. Methods of Processing

Personal data are processed by means of manual, electronic, and automated tools, using procedures and methods strictly related to the purposes set out above, and in any event in such a way as to ensure the security and confidentiality of the data, in compliance with the technical and organisational measures required by the GDPR.

It is expressly stated that, due to the very nature and purposes of the Project, the artist's name (or tag), together with the artist's biographical profile and the donated Materials, will be made publicly accessible during the exhibition and subsequently through both physical and digital consultation of the Archive.

5. Recipients of the Personal Data

Personal data may be disclosed to:

- entities providing technical, IT, or organisational support services on behalf of Kineton for the digital cataloguing and management of the Archive, appointed as data processors where required pursuant to Article 28 GDPR;
- the public, during the exhibition and through consultation of the Archive, as well as through the communication channels (website, social media, and other media) used by Kineton to promote the Project, within the limits set out in Section 3(b) and (c).

Personal data will not be transferred to countries outside the European Union, unless this is necessary for the use of digital consultation platforms or social media services involving international data transfers. In such cases, the transfer will take place in accordance with the safeguards provided for in Chapter V of the GDPR.

6. Data Retention Period

The personal data and the donated Materials will be retained for the entire duration of the Archive, consistently with the permanent and publicly accessible nature of the Project, unless the data subject exercises the right to erasure within the limits set out in Section 8, insofar as this is compatible with the irrevocable nature of the donation with respect to the physical Materials.

7. Nature of the Provision of Personal Data

The provision of identification and contact details is necessary for the management of participation in the Project.

The provision of consent for the purposes of publication, exhibition, and public consultation referred to in Section 3(b) and (c) is voluntary. However, refusal to provide such consent will prevent the inclusion of the Materials in the exhibition and the Archive, as these purposes are inherent and essential to the objectives of the Project.

8. Rights of the Data Subject

The data subject has the right, in the cases provided for by the GDPR, to obtain from the Data Controller access to their personal data (Article 15 GDPR), rectification (Article 16 GDPR), erasure (Article 17 GDPR), restriction of processing (Article 18 GDPR), data portability (Article 20 GDPR), and to object to the processing (Article 21 GDPR). The data subject also has the right to withdraw their consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

It should be noted that the exercise of the right to erasure or the withdrawal of consent relating to the publication and consultation of the artist's biographical profile shall not, in itself, entail the return of the donated Materials, in view of the irrevocable nature of the donation as governed by the application form.

The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) if they believe that the processing of their personal data is in breach of the applicable data protection legislation.

9. Contact Details

To exercise the rights referred to in Section 8, or to request any information concerning the processing of personal data, the data subject may contact the Data Controller at its registered office at Via Gianturco No. 23, 80123 Naples, Italy, or through the contact details provided in the Project application form.