

“FIRENZE GAME” Privacy Notice (ex art. 13 Reg. UE 2016/679 – GDPR)

In accordance with the Reg. UE 2016/679 (Personal Data Protection European Code) we provide you with the necessary information on the processing of your personal data that you provided to us downloading and using the app for game Firenze Game. Firenze Game is a game mainly oriented at a very wide target audience with a focus on younger people by its very nature of app for gamification.

1. SUBJECTS OF PROCESSING

SUBJECT OF DATA PROCESSING, in accordance with artt. 4 and 24 of the Reg. EU 2016/679 è Linea Comune SPA con sede in via Reginaldo Giuliani 250, 50141 Firenze. RESPONSIBLE FOR DATA PROCESSING, in accordance with the artt. 4 and 28 of Reg. EU 2016/679 is the General Manager of Linea Comune Spa, Dott. Giuseppe Mantero, located in via Reginaldo Giuliani 250, 50141 Firenze.

2. FIRENZE GAME – COLLECTED DATA

The collectible card game of Florence, by its very nature of mobile application for gamification, is a game mainly oriented at a very wide target audience with a focus on younger people. So, this app collects only the data strictly necessary for the working and participation in game and classification, just exactly because it may be of interest to young people and kids. For this purpose, the only personal data (non-sensitive) that we collect is the email address, because in case of very young people it is always supposed to be mediated by adult supervision. The email address is requested during the registration with a Nickname (see description below) and it is necessary to our system to proceed with the registration and access to the game.

We quote below other non-personal data collected in relation to the players:

- Nickname: It is freely chosen by the user in an absolutely spontaneous way and not attributable to identity (no name and surname will be required);
- Avatar: you can choose one from among more than a dozen avatars depicting kids of different genders and ethnicities. You will not be asked the gender directly but it will be possible to realize it from the choice of the avatar.
- Scores: playing cards and unlocking them in the street of Florence you will get points that will compose a ranking of the best players;
- Set of cards available, consisting of the base deck and additional cards obtainable geolocating yourself near the places of interest in Florence;
- Position of the user: whenever the player uses geolocation functionality to unlock the cards, we will save on database the completion of this operation for each place of interest on the Florence map.

Security tools adopted for the communication of sensitive data:

The application doesn't collect sensitive data. The only personal data communicated by the application to the back-end is the email address for which management is sufficient to install an SSL certificate on the server for the use of the HTTPS protocol.

2. PURPOSE AND LEGAL BASIS OF PROCESSING

The personal data furnished (email) will be processed in accordance with the the lawful conditions ex art. 6 Reg. UE 2016/679 and for the purposes related to activities for providing / using the game service (art. 6 lett. b).

3. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF DATA

The personal data provided will be processed on anonymous basis and aggregated purely for statistical analysis related to the service monitoring. This personal data, in compliance of the above purposes, will be processed by the internal processors and/or by third-party companies within the limits of the current service contracts and in compliance of the above purposes. In particular, the data may be made available to the Municipality of Florence, upon request and in compliance with the current law as well as to companies contractually linked to Linea Comune spa; - subjects that deal with the related activities including, for example, subjects connected to design and create new playing Cards and the related accessory services; - Studies or companies in the context of assistance and consultancy relationships; - External subjects for the administration, maintenance and updating of the information system and website; - Competent authorities for compliance with legal obligations and/or provisions of public entities, upon request; - Linea Comune spa commercial partner companies. The aforementioned recipients of the data transmission will treat them as data controllers, as natural persons acting under the authority of the Data Controller and the Data Processor or as independent Data Controllers, in order to comply with the contracts or related purposes.

4. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS

The personal data provided may be transferred abroad, within or outside the European Union, within the limits and under the conditions of articles. 44 and ss. of the 2016/679 EU Regulation, in order to comply with the purposes related to the treatments. The user will have the ability to obtain a copy of the transfer conditions by writing an email to rdp-privacy@lineacomune.it with the subject "privacy".

5. DATA RETENTION PERIOD OR CRITERIA

The data processing will be carried out in an automated manner, with methods and tools aimed at guaranteeing maximum security and confidentiality, by persons specifically appointed to do so. In compliance with the provisions of art. 5 paragraph 1 letter e) of EU Reg. 2016/679 the personal data collected will be kept no longer than is necessary for the purposes for which the data were collected.

The criteria of the data retention can be consulted by writing an email to rdp-privacy@lineacomune.it with the subject "privacy".

6. NATURE OF DATA SUBMISSION AND REFUSAL

Apart from what is specified in point 2 above in which, for the data indicated (email), the lack of submitting the data will make impossible to use the game Firenze Game, in any case it will be possible for the player:

- Cancel your game email account by sending an email from the same email address from which you made registration to rdp-privacy@lineacomune.it with the subject "privacy" where you say clearly that "I request the immediate cancellation of my email address and Nickname related to the game Firenze Game". However it will be possible to carry out the cancellation activity only with the receipt of the request from the same email address from which the registration was made.

The erasure of the points described above will be taken as soon as the procedures indicated are completed.

7. RIGHTS OF DATA SUBJECTS

You may, at any time, exercise your rights as stated in Arts. 15, 16, 17, 18, 19, 20, 21, 22 of the EU Regulation 2016/679, by contacting the Data Controller or the Designated Responsible for Data processing, by emailing rdp-privacy@lineacomune.it with the subject "privacy". You have the right, at any time, to obtain from the Controller the access to your own data, the rectification, the erasure of your data, the limitation of data processing without prejudice to any other administrative and judicial appeal. You have the right to complain to the Guarantor for personal data protection and, with reference to art. 6 paragraph 1, letter a) and art. 9, paragraph 2, letter a), you have the right to revoke at any time the consent to the processing and use of your data in the forms and modalities established in the previous point 6.

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