

PRIVACY POLICY

AESVI Services S.r.l., with registered office in Piazzale Luigi Cadorna n. 2, 20123 Milan (Italy), email: info@aesvi.it. as Controller of the treatment of personal data (hereinafter, "**AESVI**" or "**Controller**") pursuant to articles 4, n. 7) and 24 of the EU Regulation 2016/679 of April 27, 2016 on the protection of individuals with regard to the processing of personal data (hereinafter, "**Privacy Regulation**") informs you, pursuant to the art. 13 of the Privacy Regulation, that your personal data is collected and processed by AESVI for purposes directly connected and essential to the provision and management of services offered by the website www.italianvideogameawards.com (hereinafter "**Website**") and, in particular, to allow you to participate in the vote of the "*People's Choice Awards*" during the event "*Italian Video Game Awards*" (hereinafter "**Services**"). The supply of your personal data is necessary for the provision of services by AESVI, therefore the failure to provide, even partially, such data will create obstacle or even impossibility for AESVI to proceed with the provision of services. By the process of processing of personal data we mean any operation or set of operations, whether or not performed by automated means and applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or modification, retrieval, consultation, use, communication by transmission, dissemination or any other form of provision, comparison or interconnection, limitation, cancellation or disclosure of personal data.

Therefore, we inform you that the data will be processed manually and/or with the support of computer or telematic tools for the following purposes.

1. Primary purposes of the processing of personal data

1.1. First of all, the processing of personal data requested that you are required to indicate when registering for the website is aimed at making it possible for you to make your vote in relation to the "*People's Choice Awards*" during the event "*Italian Video Game Awards*".

1.2. Registration on the website and use of the services is undertaken via your Facebook profile. As a consequence, when registered with AESVI it will collect (and may process) the information and personal data contained in the individual User's Facebook account, in compliance with the conditions of use provided by Facebook (see the link https://developers.facebook.com/policy/?locale=en_EN). To learn more about the type of data

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collected by Facebook and how it is processed, you can consult the privacy policy adopted by Facebook at the following link: <https://www.facebook.com/about/privacy/>.

1.3. Following registration via your Facebook profile, you will be assigned an ID number that will be required to vote. ID numbers, even though they are not per se referable to identified users, could make it possible to identify the users to whom they refer through data re-elaborations held by third parties. However, the data is processed only for the purpose of allowing access to the website, browsing the website and voting at the "*People's Choice Awards*" and strictly for the time necessary to undertake these activities. Subsequently, data is deleted or made anonymous and, therefore, in no way traceable to identified users.

2. Purpose of fulfilling obligations under the law, regulations or EU regulations

2.1. Secondly, your personal data will also be processed in order to fulfil legal, regulatory or Community law obligations.

3. Communication and dissemination of personal data for the primary purposes

3.1. The data may be communicated to any other third party when disclosure is required by law, including the purpose of prevention/repression of any illegal activity connected with access to the website.

3.2. With reference to art. 13, paragraph 1, letter (e) of the Privacy Regulation, the persons or categories of persons who may become aware of the user's personal data in their capacity as managers or agents are set out below together with a list of categories:

- staff of AESVI, appointed as data processor;
- third parties involved by AESVI in the management of the website and appointed as responsible for the treatment.

3.3. Personal data will not be the subject of disclosure

4. Mandatory or optional consent for the processing of personal data for the primary purposes

4.1. In all the cases described above in paragraphs 1,2 and 3 (in the event of communication to third parties) - and in accordance with the applicable rules of the Privacy Code and the Privacy Regulation - the Controller is not obliged to obtain specific consent for the

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processing of data of users who registered for the website. The above-mentioned treatments of data for the primary purposes, as mentioned in Article 6 of the Privacy Regulation, exclude the need to obtain a specific consent of the user. That is for the following reasons: either because the processing is necessary order to comply with an obligation provided by law, regulation or EU legislation, or the processing of data derives from a contract (in the case at hand: Regulations for the Awards Dedicated to Italian Videogames) to which the data subject is a party or in order to fulfil, prior to the conclusion of the contract, specific requests of the data party or - finally - because the processing of data pursues administrative-accounting objectives.

5. Data retention times and other information

5.1. The personal data of users who register on the website will be kept for the time strictly necessary to carry out the primary purposes illustrated in Paragraph 1 and, therefore, until the conclusion of the event "*Italian Video Game Awards*". If a user of the website, after registration and before the end of the "Italian Video Game Awards" event, requests the cancellation of his/her personal data, exercising the rights provided in Paragraph 7, his/her vote will not be counted anymore.

5.2. The data is protected by the security measures required aimed at minimizing the risk of loss, access or unauthorized treatment.

5.3. The collected data is processed within the registered office and operating offices of the Processors of the treatment.

5.4. The five year or ten-year retention periods for documents and related data of a civil, accounting and fiscal nature remain unaffected, as provided for by the laws in force.

5.5. Pursuant to art. 13, paragraph 1, letter (f) of the Privacy Regulation, we inform you that all data collected will not be transferred to a third country or an international organization either inside or outside the European Union.

5.6. Pursuant to art. 13, paragraph 2, letter (f) of the Privacy Regulation, we inform you that all data collected will not in any case be subject to any automated decision-making process, including profiling.

6. Data Controller and Data Processors

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The identification details of the Controller are the following:

AESVI Services S.r.l.

Piazzale Luigi Cadorna n. 2, 20123 Milano (Italia),

Email address for the exercise of rights pursuant to art. 7 of the Privacy Code: info@aesvi.it.

The identification details of the external Processors of the treatment are the following:

FANDANGO CLUB S. p. A.

Tax Identification Code: 0413900961

Registered office: Via Vincenzo Monti 4, 20123 - Milano

Operating headquarters: Via del Commercio, 42, 20090 - Rovido Industriale MI

Milan, via Washington, 13

email: info@fandango-club.com

THE ROCKS S.R.L.

Tax Identification Code: 08567430965

Registered office: Via Vincenzo Monti 4, 20123 - Milano

Operating headquarters: Via del Commercio, 42, 20090 - Rovido Industriale MI

Milan, via Washington, 13

email: info@therocks.it

7. Exercise of rights by the data subject

7.1. Pursuant to articles 13, paragraph 2, letters (b) and (d), 15,18,19 and 21 of the Privacy Policy, we inform you that:



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a) you have the right to request the Controller of the treatment the access to personal data, rectification or cancellation of the same or the limitation of the processing that concerns you or to refuse their treatment, in addition to the right of data transfer;

b) you have the right to lodge a complaint before the Data Protection Authority, following the procedures and instructions published on the official website of the Authority on www.garanteprivacy.it.

c) any rectification, cancellation or restriction of the processing carried out at your request - unless this proves impossible or involves a disproportionate effort - will be communicated by the Controller to each of the recipients to whom the personal data have been transmitted. The Controller may inform you of such recipients at your request.

7.2. The exercise of the rights is not subject to any formal requirement and is free of charge.

7.3. For practical purposes, articles 15 to 23 of the Regulations can be accessed following this link:

<http://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=IT>

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