



Information on the processing of personal data art. 13 EU Regulation 2016/679

Premise

The website www.programmidelcoccodrillo.it, hereinafter "the Site", was created for fun and to share the author's creations with others.

As of the drafting date of this information, 06 February 2023, the site only makes available a game App called "Salami!" and related documentation. The use of the App is free for now. The App is designed according to adequate safety standards and in such a way that it cannot cause any damage to the devices on which it is installed. The App only uses the IP address of the device and, if available, the android-id when it is connected to the local network. To play on the Internet, the App requires the nickname and e-mail address provided during registration.

IMPORTANT: the App and the Site are suitable for any age, but for people under the age of 14 it is important that parents or anyone exercising their function read this information carefully and decide accordingly whether to give consent.

Registration is required for the internet game to function properly.

No type of verification is done on the data provided, therefore it is the responsibility of the User who registers to provide data that does not relate to other people, in particular the e-mail address.

The User has functions to modify some of his data after registration. It is also available a function for unsubscribing from the site and its database. The deletion takes place immediately. If you want to be canceled immediately even from the backups, write to dpo@programmidelcoccodrillo.it. Otherwise, deletion from the backups takes place automatically within one week of deletion from the site. All the information relating to data processing is provided below, in accordance with the requirements of EU Regulation 2016/679 (hereinafter, the "Regulation" or "GDPR").

Data controller

The owner and responsible for processing the registration data is the owner of the domain www.programmidelcoccodrillo.it, which can be reached at the following mailboxes:

- dpo@programmidelcoccodrillo.it
- ll_coccodrillo@programmidelcoccodrillo.it

Since the website and the database are hosted by Aruba S.p.A via a hosting service, the Data Controller at the time of signing the hosting contract appointed the company Aruba S.p.A as the data processor (or rather, sub-processor), in accordance with the conditions described in the document https://hosting.aruba.it/documents/tc-files/it/1_condizionifornituraservizihostingaruba.pdf at point 23, page 14 and following.

Types of data processed

The personal data processed are the following:

- First name
- Surname
- Email address
- Android-id of the device on which the "Salami!" App is installed, only in the case of local network play and in the event that the device itself makes the data available.

Other data such as nickname and password are not considered personal data. The password is treated with hashing algorithms which make it impossible for the owner and the managers and sub-managers to read it.

Purpose, legal basis and optional nature of the processing

Personal data will be processed for the following purposes:

- a) unique identification of a User to make the game possible;
- b) fulfill any legal obligations.

The legal bases of the processing for the purpose a) and b) are respectively the articles 6(1)(a) and 6(1)(c) of the Regulation.

The provision of personal data for the purposes a) and b) indicated above is optional, but failing that, it will not be possible to download the game from the website and use it on the Internet.

Recipients and transfer of personal data

The website does not provide the sharing of personal data between the various registered users. The "Salami!" App makes available to other players only the nickname of the individual player who wants to play in "Internet" mode. In "local network" mode a player can use the IP address of another player's mobile device to start a game session, but this address must be communicated from one player to another by means external to the App itself or to the website (for example: by voice, by telephone, via social networks).

The data provided at the time of registration is stored:

- exclusively in digital format and only in the database used by the site www.programmidelcoccodrillo.it ;

These data are accessible only:

- to the operator of the aforementioned website and to any of its representatives;
- service providers, who act as data controllers (art. 28 of the Regulation);
- natural persons authorized by the Data Controller to process personal data (art. 29 of the Regulation) for the performance of their job duties (e.g. collaborators, system administrators, etc.);
- subjects, bodies or authorities to whom it is mandatory to communicate personal data pursuant to provisions of the law or orders from the authorities.

There is no data transfer. When a transfer will be necessary, for example to a new hosting platform, all registered Users will be informed by e-mail using the address they provided when registering.



Data transfer outside the EU

There is no transfer of data outside the European Union.

Retention of personal data

Personal data will be kept only for the time necessary for the purposes for which they are collected, respecting the principle of minimization referred to in article 5, paragraph 1, letter c) of the GDPR. The Owner or the Processor and sub-processor could keep some data even after the end of the purposes for which they were collected, and only for the time necessary to fulfill contractual and legal obligations. Further information is available from the Owner.

Methods of data processing

In relation to the indicated purposes, the processing of personal data takes place using IT and telematic tools with logic strictly related to the purposes themselves and, in any case, with methods such as to guarantee the security and confidentiality of the data, in addition to compliance with the specific obligations established by the law.

Privacy rights

The Registered User has the right to ask the Owner, at any time, for access to his personal data, the rectification or cancellation of the same or to oppose their treatment, he has the right to request the limitation of treatment in the cases provided for by the 'art.18 of the Regulation, to revoke the consent given pursuant to art.7 of the GDPR at any time; to obtain the data concerning him in a structured format, commonly used and readable by an automatic device, in the cases provided for by art.20 of the Regulation; as well as to lodge a complaint with the competent supervisory authority pursuant to article 77 of the GDPR (Guarantor for the Protection of Personal Data) pursuant to art.77 of the Regulation, if you believe that the processing of your data is contrary to the legislation in force.

The User can formulate a request for opposition to the processing of your data pursuant to article 21 of the GDPR in which to give evidence of the reasons justifying the opposition: the Data Controller reserves the right to evaluate each request, which will not be accepted in the event of the existence of reasons legitimate binding to proceed with the treatment.

Requests must be addressed in writing to the Data Controller or to the DPO at the addresses indicated above.

IMPORTANT: The registered user can change his e-mail address, password and nickname at any time. Can also unsubscribe from the website and its database. After the cancellation, can continue to use the App, but not in "Internet" mode. Use in "local network" mode will be possible but under the responsibility of the User himself who must be aware that the android-id of his mobile device will be transmitted to the Site server.

Consent

After reading this information, the User, by marking the checkbox on the registration page on the Site that contains this information, and pressing the "Register" button, performs the three actions described below:

- Declares that the data provided, in particular the e-mail address, does not belong to other people.
- Explicitly consents to the processing of the data provided.
- Releases the Owner from any liability related to use of the game outside the conditions dictated by common sense or permitted by one's activities (for example, use of the game while carrying out one's work activity, or while studying or attending lessons or courses, or while driving vehicles, etc.).