

PRIVACY POLICY

WHY ARE YOU SEEING THIS NOTICE?

You have provided or may need to provide us with Personal Data (as defined below) by using the Propaganda Italia S.r.l. ("**Propaganda**") Platform available at <https://www.propaganda.it> or one of its subdomains (the "**Site**"), including simply displaying the contents of it. The Site also includes data referring to projects and talent as produced, developed and/or optioned by Propaganda ("**Productions**") whose titles, names and information are protected.

This data privacy notice applies to you to the extent that EU data protection law applies to our processing of your Personal Data or to the extent that you are a resident of the EEA. If this data privacy notice applies to you, you have certain rights with respect to your Personal Data which are contained in this data privacy notice.

"**Personal Data**" has the meaning given in EU data protection law, depending on the context, and includes any information relating to an identifiable person (such as name, address, date of birth or economic information).

WHO IS PROVIDING THIS NOTICE?

This privacy statement is made on behalf of Propaganda Italia S.r.l. ("**Propaganda**") who is committed to protecting and respecting your privacy.

When we use the terms "**we**", "**us**" and "**our**" in this data privacy notice, we are referring to Propaganda.

When you provide us (or have provided us with) your Personal Data, Propaganda acts as a "controller" for the purposes of EU data protection law.

Simply put, this means that:

- we "**control**" or "**use**" the Personal Data you provide - including ensuring that it is kept secure; and
- we make certain decisions on how to use and protect your Personal Data - but only to the extent that we have informed you of the use or are otherwise permitted by law to do so.

WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

The types of Personal Data we process, hold and share depend on the relation you have with us and the nature of your trade. This can include or be related to:

- contact details (private or professional): full name, postal address, e-mail address, telephone number;
- credentials: e.g., identity (identity card, social security number, passport information, etc.), place and date of birth, nationality, gender, photo;
- fiscal information: e.g., tax identification number and tax status;
- education and employment information: e.g., name of employer, job, level of education, remuneration;
- banking information: e.g., bank details;
- activity and interaction on the Site, our other applications, and our social media pages, (connection and tracking data such as cookies, connection to online services, IP address, geolocation data), call, chat, e-mail, interview, telephone conversation and information about your device (IP address, technical specifications and unique identification data);

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The Personal Data collected about you will help us provide you with a better service and facilitate our business relationship.

- We may combine the Personal Data you provide to us with the Personal Data we collect from or about you in certain circumstances; and
- This will include Personal Data collected in an online or offline context.

WHERE DO WE GET YOUR PERSONAL DATA FROM?

We may collect or have collected Personal Data about you from a number of sources, including from you directly.

Personal data that you communicate to us:

- from the forms and any associated documentation that you fill out when subscribing to an interest in Propaganda. This may include information about your name, address, date of birth, passport details or other national identifier, driver's license, national insurance or social security number and information about employment;
- when you submit identity information to us such as identity card, passport;
- when you provide them to us in correspondence and conversations;

Personal data we obtain from third parties:

- publicly accessible and accessible directories and sources;
- professional partners such as agents / agencies of which you may be a client;
- tax authorities, including those based outside the EEA if you are subject to tax in another jurisdiction;
- governmental and competent regulatory authorities to which we have obligations;

WHY DO WE PROCESS YOUR PERSONAL DATA?

We may process or use your Personal Data for the following reasons or purposes:

1. Contract

It is necessary to take steps at your request before entering into a contract and performing our contractual obligations with you to:

- assess (for example on the basis of your age and experience) whether you are eligible to attract public funds;
- administer, manage, and configure your work experience with us by responding to your requests;
- respect the contractual obligations that we have towards you;
- facilitate the continuation or termination of the contractual relationship between you and Propaganda; and
- facilitate the transfer of funds and facilitate any other transaction, between you and Propaganda.

2. Compliance with the law

It is necessary for compliance with an applicable legal or regulatory obligation to which we are subject:

- undertake our due diligence with our clients and investors, as well as integration checks;
- verify the identity and addresses of our investors, suppliers and employees;
- record transactions for accounting purposes;
- comply with requests from duly authorized local or foreign financial, fiscal, administrative, criminal, or judicial authorities, law enforcement agencies, state agencies or public bodies;
- carry out audit checks;
- keep statutory registers;
- manage, prevent, and detect fraudulent acts;

3. Our legitimate interest

For our legitimate interests or those of a third party:

- evaluate and process any requests or requests you make;
- send updates, information and notices or otherwise correspond with you in connection with your dealings with Propaganda;
- deal with or investigate any complaint, claim, procedure, or dispute;
- provide and inform you about our services and to improve them, carry out customer satisfaction and opinion surveys;
- monitor and improve our relations with investors, suppliers and employees;
- comply with applicable regulatory obligations;
- manage our risks and operations;
- comply with our accounting and tax reporting requirements;
- comply with our audit requirements;
- assist in internal compliance with our policies and processes;
- ensure appropriate management and governance of the Company;
- keep our internal archives;
- prepare incident / accident reports;
- protect our business against fraud, breach of trust, theft of proprietary documents and other financial or commercial crimes (to the extent that this is not required by law);
- analyse and manage business risks;
- seek professional advice, including legal advice;
- protect the security and integrity of our IT systems.

[4. Your consent](#)

We rely on explicit consent to improve your user experience on the Site in order to:

- monitor and analyse Site activity and engagement with the media and Propaganda publications; and
- send you marketing and promotional messages related to the entertainment industry.

Note that we monitor communications where we are required by law to do so. We will also monitor where we are required, where we are permitted to do so, to protect our business and the security of our systems.

[WHO DO WE SHARE YOUR PERSONAL DATA WITH?](#)

Your Personal Data will be shared with:

[1. Propaganda Italia Development & Production, Legal & Compliance, Finance & Accounting Teams](#)

We share your Personal Data with certain members of the Propaganda team, and related parties. This is to:

- manage our relationship with you; and
- serve the purposes set out in this data privacy notice.

[2. Administrator, agency, professional partners such as accountant, lawyer or agent of which you may be a client.](#)

- to provide the services you need;
- to manage your contract;
- to support and administer activities related to you; and
- to comply with applicable laws and regulations.

[3. Local tax authorities and regulators](#)

- to comply with applicable laws and regulations;
- when required by the EEA tax authorities (who, in turn, may share your Personal Data with foreign tax authorities); and
- when required by foreign tax authorities, including outside the EEA.

[4. Service providers](#)

- to provide and facilitate the services necessary to support our business relationship with you; and
- to support and administer activities related to our business relationship with you.

[5. Our lawyers, auditors and other professional advisers](#)

- to comply with applicable legal and regulatory requirements.

In exceptional circumstances, we will share all or part of your Personal Data with:

- regulatory, prosecution and other relevant government bodies or counterparties to litigation, in any country or territory;
- organizations and agencies - where required by law;

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- third party - where we have obtained your specific consent to do so in relation to certain Production marketing & communication promotions or other limited time programs which may involve you.

DO YOU HAVE TO PROVIDE US WITH THIS PERSONAL DATA?

When we collect Personal Data from you, we will indicate whether:

- the provision of Personal Data is necessary for our compliance with a legal obligation; and
- it is purely voluntary and there is no implication for you if you do not wish to provide it to us.

Unless otherwise specified, you should assume that we need the Personal Data for business and / or compliance purposes.

Some of the Personal Data we request, or have requested, is necessary for us to perform our contract with you and if you do not wish to provide such Personal Data to us, this will affect our ability to provide our services to you and to manage your contract.

USE OF PERSONAL DATA IN DIRECT MARKETING

We intend to use your Personal Data in direct marketing, but we cannot do so unless we have received your consent (which includes an indication of no objection) for such purposes. In this regard, please note that:

- a. your name, contact details and demographic data held by us may be used by us in direct marketing from time to time;
- b. the following classes of services, products and subjects may be marketed: entertainment, feature films, tv series, audiovisual productions and related services and products;
- c. the above services, products and matters may be provided or requested by Propaganda and / or third-party with which Propaganda contracts;
- d. in addition to marketing the above services, products, and topics, we also intend to provide the data described in (i) above to all or one of the persons described in paragraph (iii) above for them to use in connection with their services, products and topics, and we need your written consent (which includes a no-objection statement) for this purpose; and

If you do not want Propaganda to use or provide others with your Personal Data for direct marketing purposes as described above, you can exercise your right of withdrawal, free of charge, by notifying us through the contact details provided at the end of this notice.

SENDING YOUR PERSONAL DATA INTERNATIONALLY

We will transfer your Personal Data to our affiliates as well as third party service providers outside the EEA, which may not have privacy protection laws that are equally strict regarding data and confidentiality.

When we transfer Personal Data to our partners or to our service providers, we have put in place data transfer agreements and safeguards using terms approved by the European Commission.

Please contact us if you would like to know more about these agreements. Please see below for our contact details.

CONSENT – AND YOUR RIGHT TO WITHDRAW IT

With the exception of the limited cases described above, we generally do not rely on obtaining your consent to process your Personal Data.

If we do, you have the right to withdraw this consent at any time.

Please contact us or email us at amministrazione@propaganda.it at any time if you wish to withdraw your consent.

RETENTION AND DELETION OF YOUR PERSONAL DATA

We keep your Personal Data for as long as we need it for our legitimate business purposes, to perform our contractual obligations, or for a longer period required by law or regulatory obligations applicable to us.

- we will generally retain Personal Data about you throughout the life cycle of any production in which you are involved; and
- some Personal Data will be kept after the end of your relationship with us.

As a rule, we do not keep your Personal Data longer than necessary.

We will generally delete your Personal Data (at the latest) after you have ceased your work relationship with Propaganda and there is no longer a legal or regulatory obligation or business purpose to retain your Personal Data.

AUTOMATED DECISION MAKING

We will not take decisions which produce legal effects concerning you, or otherwise significantly affect you, solely on the basis of the automated processing of Personal Data, unless we have examined the treatment offered in a particular case and concluded in writing that it meets EU data protection requirements, legislation and other applicable laws.

YOUR RIGHTS

- You have certain data protection rights, including:
- the right to access your Personal Data (right of access);
- the right to restrict the use of your Personal Data (right to limit processing);
- the right to have incomplete or inaccurate Personal Data corrected (right of rectification);
- the right to ask us to stop processing your Personal Data (right to object, see below); and
- the right to ask us to delete your Personal Data in certain limited circumstances (right to erasure).

You also have the right to lodge a complaint with a supervisory authority.

If you reside in the EU, you have the right to object to the processing of your Personal Data, for reasons related to your particular situation, at any time during the processing of your Personal Data based on Article 6 paragraph 1e GDPR (data processing in the public interest) and Article 6 paragraph 1f of the GDPR (data processing based on the balancing of interests) in accordance with Article 21 of the GDPR.

Please contact us using the methods described below in relation to the above requests.

THE USE OF COOKIES ON OUR WEBSITE

Propaganda uses the data collected by cookies and JavaScript libraries to improve your browsing experience, analyze Site traffic, deliver personalized advertising and increase the overall performance of our Site.

By using the website, you agree to our data collection policy described below, and you acknowledge that you can update your preferences.

HOW DO WE COLLECT DATA ON OUR WEBSITE?

We use a variety of tools on our website that collect data using both cookies and JavaScript libraries.

Cookies are small text files that store Internet settings for the websites you visit. They are widely used to make website features work, run more efficiently, or improve your experience on the Site. Cookies are also used to remember your preferences or personalize content so that it is more relevant to you.

JavaScript libraries are snippets of code that we run on the page and that are executed when certain actions take place.

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The table below describes how we use this data by category.

[Functional](#)

Objective: to monitor the performance of our Site and improve your browsing experience. For example, these tools allow you to communicate with us via live chat.

[Marketing and analytics](#)

Objective: to understand user behaviour in order to offer you a more relevant browsing experience or to personalize the content of our Site. For example, we collect information about the pages you visit to help us present more relevant information.

[Advertising](#)

Purpose: To personalize and measure the effectiveness of advertising on our Site and other websites. For example, we may provide you with a personalized ad based on the pages you visit on our Site.

[Essential](#)

Purpose: Propaganda uses browser cookies, which are necessary for the Site to function as intended. You can turn off these cookies in your browser settings, but if you do, the Site may not work as expected.

DETAILS OF DATA PROCESSING

Personal data is collected for the following purposes and using the following services:

[Analytic](#)

Analytics services allow the owner to monitor and analyze web traffic and can be used to track user behavior.

[Thermal mapping and session recording](#)

Heat mapping services are used to display the areas of a page where users most often move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and to track user behavior. These services can record sessions and make them available for later visual playback.

[Platform and hosting services](#)

These services are intended to host and run key components of [Propaganda.it](#), thereby enabling the delivery of [Propaganda.it](#) from a unified platform. These platforms provide a wide range of tools for the owner - e.g., analysis, user registration, comments, database management, e-commerce, payment processing - which involve the collection and processing of Personal Data. Some of these services operate through geographically distributed servers, making it difficult to determine the actual location where Personal Data is stored.

[Tag management](#)

This type of service helps the owner to manage the necessary beacons or scripts on [Propaganda.it](#) centrally. As a result, user data passes through these services, which may result in the retention of this data.

[Viewing content from external platforms](#)

This type of service allows you to view and interact with content hosted on external platforms directly from [Propaganda.it](#) pages. This type of service can still collect web traffic data for pages where the service is installed, even when users are not using it.

[Interaction with data collection platforms and other third parties](#)

This type of service allows users to interact with data collection platforms or other services directly from [Propaganda.it](#) pages for the purpose of backing up and reusing data. If one of these services is installed, it may collect browsing and usage data in the pages where it is installed, even if users are not actively using the service.

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Management of data collection and online surveys

This type of service allows Propaganda.it to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse the data of any responding user. The Personal Data collected depends on the information requested and provided by Users in the corresponding online form. These services can be integrated with a wide range of third-party services to allow the owner to take additional action with the processed data - e.g., contact management, sending messages, analysis, advertising and payment processing.

Registration and authentication

By registering or authenticating, Users allow Propaganda.it to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, Propaganda.it will be able to access certain Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; for more information, please refer to the description of each service.

User database management

This type of service allows the owner to create user profiles based on an email address, personal name or other information that the user provides to Propaganda.it as well as to track the activities of the user through analysis features. This Personal Data may also be matched with publicly available information about the user (such as social media profiles) and used to create private profiles which the owner can view and use to improve Propaganda.it. Some of these services may also allow the sending of timed messages to the user, such as emails based on specific actions performed on Propaganda.it.

Communication with users:

These types of services allow the owner to schedule online meetings with users and conduct audio / video conferences, which can be recorded.

CONCERNS OR REQUESTS

We take your concerns very seriously. We encourage you to bring it to our attention if you have any concerns about our processing of your Personal Data.

This data privacy notice has been written for simplicity and clarity. We are, of course, happy to provide any additional information or explanation needed. Our contact details are below.

If you would like to make a complaint, you can also contact the data protection body in your country, where you live or work, or where the data protection issue has arisen. A list of EU data protection authorities is available by clicking on this link: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

CONTACT US

Please contact us if you have any questions about this data privacy notice or the Personal Data we hold about you.

Contact us by email at amministrazione@propaganda.it

Contact us in writing using this address:

Propaganda Italia
Via Giacomo Barzellotti, 9
00136 Roma
Italia

CHANGES TO THIS DATA PRIVACY NOTICE

We regularly review this data privacy notice.

THIS DATA PRIVACY NOTICE WAS UPDATED ON 15 DECEMBER 2021.