

Last update: November 2023

PRIVACY INFORMATION PURSUANT TO ART. 13 OF EU REGULATION NO. 2016/679 ("GDPR")

Your privacy is our priority, just like the quality of the product we aim to provide and enhance through the information you share with us every day.

It's important to note that this notice applies exclusively to the processing of personal data that the User chooses to provide within the established relationship with us.

Identity and contact details of the Data Controller

The data controller for personal data is Spectre S.r.l. unipersonale ("Spectre" or the "Company"), with registered office in Milan (MI), Via Santa Sofia n. 12 (e-mail privacy@cinestream.store , PEC spectre@pecaruba.it).

What information do we collect

- **Personal information:**

- We collect identifying and contact data that the User provides during registration on our platform, such as name, surname, gender, date of birth, and login credentials (email and password).
- We collect metadata from audiovisual files uploaded by Users for the creation or publication of their own content.
- We collect any other information provided voluntarily.

- **Commercial information:** we collect details regarding reservations and purchases made.

- **Marketing purposes:** we collect information that the User provides when subscribing to our newsletter or participating in any promotions or contests.

- **Access and site usage information:** we collect details like IP address, browser, and operating system used, pages visited, and other information gathered through various tracking methods, including the use of cookies./li>

For more information about cookies, please read our [cookie policy](#)

How we process data and on what legal basis

We use the collected personal data to allow the User to enjoy the requested.

The processing of data for this purpose is necessary for the execution of a contract to which the data subject is a party or for the execution of pre-contractual measures taken at the request of the same (Art. 6.1 letter b GDPR).

Any processing of personal data for marketing purposes (e.g., subscribing to our newsletter, participating in promotions or contests) will only occur with the explicit consent (Art. 6.1 letter a GDPR) of the data subject.

We may aggregate and anonymize information provided by Users to conduct analyses aimed at improving our products and services, developing new features or products, gaining a deeper understanding of our customers' desires, with the goal of increasing their satisfaction and loyalty to our brand.

The processing of the User's personal data will mainly be carried out using computer and electronic means to ensure confidentiality and security.

To which recipients do we communicate personal data

In addition to our internal staff, some processing may be carried out by third-party organizations to which we can delegate certain activities that will operate as Data Processors.

The complete and updated list of these third-party entities is available at the Spectre headquarters.

Spectre, with the Cinestream system, when booking a show, shares part of your data with UCI Italia S.p.a. This includes the video files necessary for projecting your message, booking details, or your contact number for urgent communications, such as canceling a screening due to force majeure by a local manager.

Furthermore, we reserve the right to share data with potential buyers in case we plan to transfer the ownership or control of the entire company or a part of it.

How do we store data and ensure secure archiving

User account data and associated information or files will be stored until the account is deactivated (upon user request or in cases specified by the Site's [Term of use](#)) and, in any case, for the period necessary to fulfill the purposes mentioned above and/or legal obligations.

Personal files, including audiovisual files uploaded for content creation, will be stored for the time required to provide the service (as per national regulations), not exceeding 365 days after their last use, after which they will be automatically deleted.

We implement and provide our partners with management tools and operational procedures to ensure the protection of personal data against the risks of destruction, loss, or alteration (accidental or unlawful), and unauthorized access.

Rights Regarding Personal Data

An individual has the right to exercise various rights over their personal data, as recognized by the General Data Protection Regulation (GDPR). In particular, the GDPR grants the right to:

1. **Access and Rectification:** The right to request access to personal data, rectify inaccurate information, and integrate incomplete personal data.
2. **Erasure:** The right to obtain the erasure of personal data, unless processing is necessary for the fulfillment of a legal obligation under national or European Union law or for the establishment, exercise, or defense of legal claims.
3. **Limitation of Processing:** In cases defined by Article 18 of the GDPR, the right to obtain the limitation of processing of personal data.
4. **Data Portability:** If processing is carried out by automated means and is based on consent or the necessity of performing contractual obligations, the right to request data portability – to receive personal data concerning them in a structured, commonly used, and machine-readable format and to transmit it to another controller without hindrance.
5. **Consent Withdrawal:** If processing is based on consent, the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
6. **Complaint to Supervisory Authority:** The right to lodge a complaint with the competent supervisory authority (e.g., in the member state of habitual residence, work, or the place of the alleged violation).

Spectre, as prescribed by the GDPR, commits to providing the individual with information regarding the action taken concerning a request to exercise their rights without undue delay and, in any case, within one month of receiving the request.

For further assistance regarding these rights, the individual can always contact privacy@cinestream.store.

The nature of providing personal data and consequences of non-disclosure

Providing personal data to manage your website registration, booking a show, and publishing your content is a necessary requirement. Therefore, in case of omitted or partial provision of the requested information or acceptances, we will not be able to fulfill your needs.

SPECTRE

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