

ALESSIO SCALERANDI

Privacy Policy as of Dec 11, 2023

The following privacy policy covers both my website <u>alessioscalerandi.com</u> and my business practices in general as it pertains to my collection, storage, use, access and deletion of customer data.

Information I Collect

To fulfill your order or complete a commission for you, you must provide me with certain information, such as your name, email address, postal address, payment information, and the details of the artwork that you're purchasing or for the commission that you're ordering.

Why I Need Your Information and How I Use It

I rely on a number of legal bases to collect, use, and share your information, including:

- as needed to provide my services, such as when I use your information to fulfill your order, work on your commission, to settle disputes, or to provide customer support;
- when you have provided your affirmative consent, which you may revoke at any time;
- if necessary to comply with a legal obligation or court order or in connection with a legal claim, such as retaining information about your purchases if required by tax law; and
- as necessary for the purpose of my legitimate interests, if those legitimate interests are
 not overridden by your rights or interests, such as providing and improving my services. I
 use your information to provide the services you requested and in my legitimate interest
 to improve my services.

Information Sharing and Disclosure

Information about my customers is important to my business. I share your personal information only for very specific reasons and in limited circumstances, as follows:

- Service providers. I engage certain trusted third parties to perform functions and provide services to my shop, such as delivery companies. I will share your personal information with these third parties, but only to the extent necessary to perform these services.
- Compliance with laws. I may collect, use, retain, and share your information if I have a
 good faith belief that it is reasonably necessary to: (a) respond to legal process or to
 government requests; (b) enforce my agreements, terms and policies; (c) prevent,
 investigate, and address fraud and other illegal activity, security, or technical issues; or
 (d) protect the rights, property, and safety of my customers, or others.

Specific third-party platforms which I use

I use the following platforms to store your data in the following ways in order to run my business, complete commissions, and fulfill orders:

- Google Drive: My commission request form and all data collected through it are hosted by the Google Drive service. Any files containing collected data are kept private.
- <u>Gmail</u>: I may communicate with you via Gmail, and our conversations and all contents therein will be retained within our private email conversations.
- <u>Telegram</u>: I may communicate with you via Telegram in private conversation and we may share files, images, or your personal shipping details with one another.
- Paypal: I may store your name, email address, postal address and payment information in my Paypal address book for the purpose of invoicing and payment traceability as required by law.
- <u>Trello</u>: I may share your alias and image files on either a private or public-facing Trello board in order to track my commission orders and progress. If you have specified you wish your commission to remain private, it will never be shared on a public-facing board.

Data Retention

I retain your personal information only for as long as necessary to provide you with my services and as described in my Privacy Policy. However, I may also be required to retain this information to comply with my legal and regulatory obligations, to resolve disputes, and to enforce my agreements. I generally keep your data for a period of 2 years.

Transfers of Personal Information Outside the EU

I may store and process your information through third-party hosting services in the US and other jurisdictions. As a result, I may transfer your personal information to a jurisdiction with different data protection and government surveillance laws than your jurisdiction. If I am deemed to transfer information about you outside of the EU, I rely on Privacy Shield as the legal basis for the transfer.

Your Rights

If you reside in certain territories, including the EU, you have a number of rights in relation to your personal information. While some of these rights apply generally, certain rights apply only in certain limited cases. I describe these rights below:

- Access. You may have the right to access and receive a copy of the personal information.
 I hold about you by contacting me using the contact information below.
- Change, restrict, delete. You may also have rights to change, restrict my use of, or delete your personal information. Absent exceptional circumstances (like where I am required to store data for legal reasons) I will generally delete your personal information upon request.
- Object. You can object to (i) my processing of some of your information based on my legitimate interests and (ii) receiving marketing messages from me after providing your express consent to receive them. In such cases, I will delete your personal information unless I have compelling and legitimate grounds to continue using that information or if it is needed for legal reasons.
- Complain. If you reside in the EU and wish to raise a concern about my use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local data protection authority.

How to Contact Me

For purposes of EU data protection law, I, Alessio Scalerandi, am the data controller of your personal information. If you have any questions or concerns, you may contact me at scalerandi.art@gmail.com.