

KINÉ SOCIETÀ COOPERATIVA A.R.L.

Film and Audiovisual Production

PRIVACY NOTICE

*pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)
and Italian Legislative Decree no. 196 of 30 June 2003 (Privacy Code) as amended by Legislative Decree
101/2018*

1. Identity and contact details of the Data Controller

This Privacy Notice is issued by:

Company name	Kiné Società Cooperativa a.r.l.
Legal form	Limited liability cooperative company (Società Cooperativa a.r.l.)
Registered office	Via Oberdan, 33 g/h – 53034 Colle di Val d'Elsa (SI) – Italy
Tax Code / VAT No.	IT01238660524
Chamber of Commerce	SI-131521 – Chamber of Commerce of Siena
Legal representative	Claudio Giapponesi
E-mail	info@kine.it
Certified e-mail (PEC)	info@pec.kine.it
Website	www.kine.it
Telephone	+39 0577 924338

The Data Controller is the company indicated above, represented by its legal representative pro tempore, Claudio Giapponesi.

2. Data Protection Officer (DPO)

Kiné Società Cooperativa a.r.l., having regard to its size and the nature of its processing activities, is not currently required to designate a Data Protection Officer under Article 37 GDPR. For any questions relating to the processing of personal data, please contact the Data Controller directly at the following contact details:

- E-mail: info@kine.it
- Telephone: +39 0577 924338
- Certified e-mail (PEC): info@pec.kine.it

3. Categories of personal data processed

The Controller processes, for the various purposes described below, the following categories of personal data:

3.1 Data provided voluntarily by the data subject

- Identification data (first name, last name, date and place of birth, tax identification number)
- Contact details (e-mail address, telephone number, postal address)
- Professional data (CV, portfolio, work experience, references)
- Data relating to unsolicited applications or selection of artistic and technical personnel
- Images, photographs and video footage provided by the data subject for casting purposes
- Content submitted via forms on the website

3.2 Data collected automatically

- Browsing data: IP address, browser type, operating system, pages visited, access times
- Approximate location data inferred from IP address
- Cookies and similar identifiers (please refer to the Cookie Policy)

3.3 Special categories of data (Art. 9 GDPR)

Kiné, in the course of its film and audiovisual production activities, may process special categories of personal data (e.g. images or video in which individuals are identifiable; health data of actors and extras; data revealing political or religious opinions relevant to the artistic production) exclusively on the basis of the data subject's explicit consent or in accordance with the legal bases set out in Article 9(2) GDPR and applicable national provisions.

4. Purposes of processing and legal bases

Purpose	Legal basis (Art. 6 GDPR)	Notes
Handling contact requests and information enquiries via the website	Art. 6(1)(b) GDPR – pre-contractual measures at the data subject's request	—
Selection of artistic and technical personnel (casting, collaborators, suppliers)	Art. 6(1)(b) (pre-contractual) and Art. 6(1)(a) (consent for special categories)	—
Performance of contractual obligations towards collaborators, suppliers and partners	Art. 6(1)(b) GDPR – performance of a contract	—
Compliance with legal, fiscal and accounting obligations	Art. 6(1)(c) GDPR – legal obligation	—
Protection of rights in judicial, arbitral or out-of-court proceedings	Art. 6(1)(f) GDPR – legitimate interests	Legitimate interest: legal defence of the Controller
Sending promotional communications, newsletters and production updates (with consent only)	Art. 6(1)(a) GDPR – consent of the data subject	Consent may be withdrawn at any time
Statistical analysis of web traffic and website improvement	Art. 6(1)(a) (non-technical cookies); Art. 6(1)(f) (anonymised aggregate analysis)	Legitimate interest: service improvement
Management of image rights and use of footage for promotional and artistic purposes	Art. 6(1)(a) GDPR – consent; Arts. 96-97 Italian Copyright Act (L. 633/1941)	Subject to execution of a model release form

5. Methods of processing

Personal data are processed using the following methods:

- Primarily electronic processing, using IT systems and applications equipped with appropriate technical and organisational security measures pursuant to Article 32 GDPR.
- Paper-based processing for documents that require it, stored in dedicated secure physical archives.
- Kiné implements appropriate security measures to protect data from unauthorised access, disclosure, alteration or destruction, including encryption of data in transit (TLS/SSL), role-based access control (RBAC) and regular backup procedures.

6. Disclosure and dissemination of data

Personal data may be disclosed, to the extent strictly necessary for the purposes referred to in section 4 above, to the following categories of recipients:

- Public authorities, social security bodies, tax authorities and judicial bodies, where required by law (INPS, Agenzia delle Entrate, SIAE, AGCOM, etc.).
- Banking and financial institutions for payment processing.
- IT, hosting, cloud and website management service providers, designated as Data Processors pursuant to Article 28 GDPR.
- Post-production companies, dubbing studios, distributors and co-producers in the context of production activities, subject to execution of appropriate agreements.
- Legal advisors, accountants and auditors bound by professional secrecy obligations.
- Casting agencies and talent agencies, within the limits of the consent given by the data subject.

Data will not be subject to indiscriminate dissemination, except for purposes connected with the distribution and promotion of cinematographic and audiovisual works within the limits of the consent given.

Kiné does not transfer personal data to countries outside the European Economic Area (EEA).

7. Retention periods

Category / Purpose	Retention period
Contractual data (contracts with actors, technicians, suppliers)	10 years from the end of the contractual relationship (Art. 2946 Italian Civil Code)
Tax and accounting data (invoices, expense reports, VAT registers)	10 years pursuant to Presidential Decree 600/1973 and Legislative Decree 127/1991
CVs and application data (casting/selection)	12 months from receipt, unless different consent is given or an employment relationship is established
Contact data for marketing purposes (newsletters)	Until consent is withdrawn, and in any case no longer than 36 months from the last interaction
Footage and images for which image rights have been transferred	For the entire duration of the rights and in any case within the terms of the release form
Navigation data and system logs	12 months from collection, unless required for legal defence purposes

Requests to exercise data subjects' rights	5 years from the handling of the request (for evidentiary purposes)
--------------------------------------------	---------------------------------------------------------------------

Upon expiry of the retention periods indicated above, data will be deleted or irreversibly anonymised, unless their retention is necessary to comply with legal obligations or to exercise or defend rights in legal proceedings.

8. Rights of data subjects

Data subjects have the right to exercise, at any time and free of charge, the following rights against the Controller:

Reference	Right	Content
Art. 15 GDPR	Right of access	Obtain confirmation as to whether personal data are being processed and access a copy thereof.
Art. 16 GDPR	Right to rectification	Obtain the correction of inaccurate data or the completion of incomplete data.
Art. 17 GDPR	Right to erasure	Obtain the deletion of data ('right to be forgotten') where they are no longer necessary or consent is withdrawn.
Art. 18 GDPR	Right to restriction	Obtain restriction of processing in certain cases provided for by law.
Art. 20 GDPR	Right to data portability	Receive data in a structured, machine-readable format and transmit them to another controller.
Art. 21 GDPR	Right to object	Object to processing based on legitimate interest or for direct marketing purposes.
Art. 7 GDPR	Withdrawal of consent	Withdraw consent at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

To exercise their rights, data subjects may send a written request to info@kine.it or by registered letter with acknowledgement of receipt to the registered office: Via Oberdan, 33 g/h – 53034 Colle di Val d'Elsa (SI) – Italy, stating their name, surname, contact details and specifying the right they wish to exercise.

The Controller will respond without undue delay and, in any event, within 30 days of receipt of the request, extendable to 90 days in cases of particular complexity (Article 12 GDPR).

9. Right to lodge a complaint with the Supervisory Authority

Without prejudice to any other administrative or judicial remedy, data subjects have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) if they consider that the processing of their personal data infringes the GDPR (Article 77 GDPR):

Name	Garante per la Protezione dei Dati Personali
Address	Piazza Venezia, 11 – 00187 Rome (Italy)
Website	www.garanteprivacy.it
E-mail	garante@gpdp.it

Certified e-mail (PEC)	protocollo@pec.gdpd.it
Telephone	+39 06 69677 1

10. Cookies and tracking technologies

The website www.kine.it uses cookies and similar technologies. For detailed information on the types of cookies used, their purposes and how to give or withdraw consent, please refer to the Cookie Policy available at: <https://www.kine.it/cookie-policy-ue/>.

In accordance with the Italian Data Protection Authority's Guidelines on cookies and other tracking tools of 10 June 2021 and the requirements of Legislative Decree 69/2012 (implementing ePrivacy Directive 2009/136/EC), the use of non-technical cookies is subject to the prior consent of the data subject, which may be freely given and withdrawn at any time via the cookie banner/preference management panel.

11. Personal data of minors

The Kiné website is not intended for individuals under the age of 18. Pursuant to Article 8 GDPR and Article 2-quinquies of the Italian Privacy Code (as amended by Legislative Decree 101/2018), the processing of personal data of minors for purposes related to the provision of information society services is lawful only where the minor is at least 14 years of age; for minors under 14 years of age, the consent of the holder of parental responsibility is required.

In the context of casting and production activities involving minors, Kiné adopts specific procedures to ensure compliance with applicable legislation, including Legislative Decree 66/2000 on child labour in the entertainment sector, requiring written consent from parents or legal guardians.

12. Updates to this Privacy Notice

The Controller reserves the right to update this Privacy Notice at any time, including as a result of regulatory changes or new decisions by the competent Supervisory Authorities. Any changes will be published on this page with the date of the latest update. In the event of material changes, the Controller may notify data subjects via the available contact details or, where applicable, via a banner on the website.

We therefore encourage you to review this page periodically.

Publication date: 05/03/2026 • Version 1.0
© Kiné Società Cooperativa a.r.l. – All rights reserved