Privacy Notice on the Processing of Personal Data in Newsletters and Electronic Communications

This notice specifically describes the collection and use of personal data in connection with the sending of newsletters, DEM messages and other electronic communications.

1. Data Controller

The data controller is Associazione Museo Nicolis, based at Via Lussemburgo, 9, Villafranca (VR).

For information about the processing of personal data and to exercise data subject rights, the Controller may be contacted at Info@museonicolis.com.

2. Who This Notice Applies To

This notice applies to individuals who:

- subscribe to the Museo Nicolis newsletter or other electronic communications;
- receive promotional or informational communications from Museo Nicolis;
- interact with such communications, including by opening, clicking or forwarding them;
- make purchases after receiving or selecting a link contained in a communication;
- have provided their data in the context of a business relationship or sale and may receive communications relating to similar products or services, where permitted by law.

3. Categories of Data Processed

In connection with sending and managing electronic communications, Museo Nicolis may process:

- first name, last name and email address;
- data relating to subscription, the source of the contact, and the list or segment to which the contact belongs;
- data relating to consent, objection, withdrawal and unsubscription;
- data relating to email opens, including the date and time of opening, most recent opening, number of opens and, where technically detectable, the association of the event with the recipient or an identifier attributable to that recipient;
- data relating to email forwarding, where the platform is able to detect it;
- data relating to clicks on links contained in emails, including the link selected, the date and time of the click and any association of the click with an individual recipient;
- technical data and approximate geographic data, such as the country or approximate location associated with the interaction, where derived from the IP address or other technical data;
- data relating to the device, browser, email client, IP address, campaign, message or recipient identifiers, and other technical parameters transmitted by the platform.

4. Tracking Pixels and Tracked Links

Emails sent may contain a tracking pixel, i.e. an image, usually very small, hosted on a remote server. When the email client downloads the image, the server may receive information about the opening of the message and the technical request made by the device or program used to read it.

Emails may also contain tracked links. The selection of a link may be recorded by the platform and associated with the communication, the campaign and, where the link is configured on an individual basis, the recipient or an identifier attributable to that recipient.

Depending on the technical configuration adopted, loading the pixel and selecting links may make it possible to detect:

- whether the email has been opened or reopened;
- the date and time of the opening or click;
- the number of opens;
- the link selected;
- the device, browser or email client used;
- the IP address and other technical data;
- the country or approximate location of the interaction;
- any orders or revenue attributed to the communication.

A tracking pixel does not, in itself, make it possible to learn the content of the data subject’s emails. However, its use is a means of monitoring interactions with the communication and may involve the processing of individual-level data.

5. Purposes of Processing

The data are processed for the following purposes:

a) Sending newsletters and promotional communications

To send newsletters, DEM messages, commercial communications, and updates on Museo Nicolis products, services, initiatives, events and activities.

b) Managing subscriptions and unsubscriptions

To manage recipient lists, record preferences, enable unsubscription and respond to requests to object or withdraw consent.

c) Technical verification of email delivery

To detect deliveries, failed deliveries, technical errors, full mailboxes and other events necessary to improve the technical quality of sending and to counter spam or abuse.

d) Aggregate statistics

To produce overall statistics on campaign performance, opens, clicks and delivery quality, where the data are processed in a genuinely anonymous or aggregated form and do not allow the behaviour of an individual recipient to be measured.

e) Individual measurement of interactions

To detect and analyse the opens, clicks, forwards and other interactions of an individual recipient with communications, in order to measure campaign performance and improve the content, frequency, subject line, structure and relevance of communications.

f) Conversion analysis

To determine whether a communication or link has generated an order and, where provided for by the configuration used, to attribute the relevant order, revenue or average revenue to the communication.

g) Segmentation, personalisation and demographic analysis

To create recipient segments and, where applicable, personalise communications on the basis of declared, observed, estimated or inferred data, including gender, age group, interactions, clicks, opens, orders and country of interaction.

Such activities will be carried out only within the limits described in this notice and on a valid legal basis.

h) Security, abuse prevention and protection of rights

To prevent fraudulent or abusive use of the platform, investigate technical anomalies, protect the rights of Museo Nicolis and establish, exercise or defend legal claims in judicial or extrajudicial proceedings.

6. Legal Bases

6.1 Sending promotional communications

Promotional communications by email are generally sent on the basis of the data subject’s consent. Consent is optional and may be withdrawn at any time.

In the circumstances provided for in Article 130(4) of the Italian Privacy Code, Museo Nicolis may use, for direct marketing purposes, an email address provided by the data subject in the context of the sale of a product or service to promote similar products or services, provided that the data subject has been adequately informed and can object free of charge and easily at the time of collection and in each communication.

6.2 Individual tracking of opens, clicks and conversions

Where tracking pixels, tracked links or attribution tools make it possible to monitor the behaviour of an individual recipient, measure their interactions, analyse opens and clicks, associate orders or revenue, or create individual segments, processing is carried out with the data subject’s prior consent, unless a specific exception provided for by applicable law applies.

Consent to tracking may be requested together with consent to receive promotional communications only if the request clearly explains the use of monitoring tools and allows a free, informed and unconditional choice.

6.3 Deliverability, security and aggregate statistics

Consent may not be necessary for activities strictly required for technical delivery, security or authentication, or for exclusively aggregate statistics, provided that processing is genuinely necessary for the stated purpose and that measurement of the behaviour of individual recipients is technically prevented.

In particular, aggregate statistics must be produced using measures suitable to prevent an event from being linked back to an individual data subject. Any application of this exception does not extend to individual tracking of opens, clicks, orders or revenue.

6.4 Legal obligations and protection of rights

Processing may be carried out to comply with legal obligations or to pursue Museo Nicolis’s legitimate interest in security, the technical management of the service and the protection of its rights, within the limits laid down by the GDPR and applicable law.

7. Granular Consent and Withdrawal

Where required, consent to tracking is obtained before the use of tracking pixels or other individual monitoring tools.

The data subject may withdraw consent at any time and as easily as it was given. Withdrawal may concern:

- all promotional communications;
- tracking of opens only;
- tracking of clicks and conversions only;
- additional segmentation or personalisation activities, where managed separately.

Where technically possible, withdrawal of consent to tracking does not entail unsubscription from the newsletter, nor does it prevent the receipt of communications without tracking pixels, tracked links or other individual monitoring tools.

The methods for withdrawing consent are indicated in the communications sent and may include an unsubscribe link, the preference centre or a request sent to Info@museonicolis.com.

The data subject's choices, including consent, withdrawal, objection and unsubscription, are recorded to demonstrate compliance with applicable requirements.

8. Transfers to Third Countries

Any transfers are carried out in accordance with Chapter V of the GDPR, on the basis of an adequacy decision, appropriate safeguards, standard contractual clauses or another condition provided for under applicable law.

Information about the safeguards adopted and how to obtain a copy of them may be requested from Info@museonicolis.com.

9. Data Retention

Data are retained for as long as necessary for the purposes for which they were collected and, thereafter, for the period necessary to comply with legal obligations or to establish, exercise or defend legal claims.

In particular:

- data relating to subscription, consent, withdrawal, objection and unsubscription are retained for as long as necessary to document the data subject's choices and the lawfulness of communications sent;
- data relating to deliveries, failed deliveries and technical errors are retained for as long as necessary for the technical management and security of the service;
- data relating to opens, clicks, forwards, orders, revenue, demographic data and geographic reports are retained for the period necessary for the stated purposes and are subsequently deleted, anonymised or retained only in aggregated form;
- data used to send promotional communications are retained until consent is withdrawn, an objection is made or the relevant purpose ceases, without prejudice to the data necessary to demonstrate the lawfulness of processing;
- data relating to orders and purchases are retained for the periods required by law or necessary for the management of the relationship and the protection of rights.

10. Profiling and Automated Decision-Making

Data relating to opens, clicks, orders, revenue, gender, age group and country of interaction may be used to segment recipients or personalise communications, where such activity is actually enabled.

Unless otherwise stated in a separate notice, Museo Nicolis does not carry out decisions based solely on automated processing that produce legal effects concerning the data subject or similarly significantly affect them.

Where estimated or inferred data are used, Museo Nicolis will, upon request, provide information about their origin and the principal ways in which they are used, within the limits prescribed by law.

11. Provision of Data

Providing an email address is necessary to subscribe to and receive the requested communications.

Consent to receive promotional communications and consent to individual tracking are optional. Failure to consent to tracking, or its subsequent withdrawal, does not affect the receipt of communications without individual monitoring tools, where technically possible.

12. Rights of the Data Subject

In the cases provided for by the GDPR, the data subject may exercise the right to:

- obtain confirmation as to whether or not personal data concerning them are being processed and access such data;
- have inaccurate data rectified or incomplete data completed;
- have data erased;
- obtain restriction of processing;
- object to processing based on legitimate interests;
- object at any time to processing for direct marketing purposes, including profiling related to direct marketing;
- withdraw consent at any time;
- receive data in a portable format, where applicable;
- know the source of data not obtained directly from the data subject, where applicable;
- lodge a complaint with the Data Protection Authority (Garante per la protezione dei dati personali).

To exercise these rights, please write to Info@museonicolis.com or use the links provided in email communications and in the preference centre.

13. Updates

Museo Nicolis may update this notice to reflect regulatory, technical or organisational changes to processing. The updated version will be published on the website and, where necessary, communicated to data subjects through appropriate means.

This notice supplements, and does not replace, the Cookie Policy of museonicolis.com, which governs tracking tools used on the website. Last updated: October 2026.