INFORMATION ON THE PROCESSING OF PERSONAL DATA
"Research, Intelligence and Technology for Heritage and Market Security" – RITHMS
(Task 3.1 - Data collection from websites and Task 3.3 - Data collection from existing repositories)

This is to inform, pursuant to art. 14 of the Regulation (EU) 2016/679 on the "Protection of natural persons with regard to the processing of personal data and on the free movement of such data" (hereinafter "Regulation") and Legislative Decree 196/2003 as amended and supplemented (hereinafter "Privacy Code"), about the processing of personal data carried out by "Fondazione Istituto Italiano di Tecnologia" (hereinafter "IIT"), within the Task 3.1 "Data collection from websites" and Task 3.3 "Data collection from existing repositories" of the European project entitled "Research, Intelligence and Technology for Heritage and Market Security – RITHMS" (hereinafter "RITHMS") managed by the Center for Cultural Heritage Technology of IIT (hereinafter "CCHT").

Please kindly note that this information falls within the scope of application of the art. 14 of the GDPR *"Information to be provided if the personal data have not been obtained from the interested party"* considering that the data will be collected through other Data Controllers (publishers/owners of the websites concerned). In particular, in consideration of the unavailability of the contact details of the interested parties, the exemption referred to in the art. 14, par. 5, letter b) of the GDPR is considered applicable: "*the provision of such information proves impossible or would involve a disproportionate effort, in particular for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the conditions and safeguards referred to in paragraph Art. 89 or in so far as the obligation referred to in paragraph 1 of this Article is likely to render impossible or seriously impair the achievement of the objectives of that processing. In such cases the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available*".

Specifically, the exemption refers to the disproportionate effort in relation to the absence of the contact details of the users interested.

The RITHMS project intends to boost the operational capacity of Police and Customs/Border Authorities in addressing the increasingly organized and poly-criminal nature of trafficking in cultural goods through research, technological innovation, outreach and training.

1.   Identity and contact details of the Data Controller

The Data Controller of personal data is the Fondazione Istituto Italiano di Tecnologia, based in Via Morego, 30 – 16163 Genova. – Phone +39 010 28961.

2.   Contact details of the Data Protection Officer

The Data Protection Officer is available at the following e-mail address: dpo@iit.it.

3. Object of data processing and types of personal data processed

Within Task 3.1 and Task 3.3, IIT will process the following personal data with web scrapers that will be run on the websites listed in Annex 1 of this information sheet:

- Artists' names and surnames
- Buyers' names and surnames
- Owners' names and surnames
- Owning companies' data
- Donors' names and surnames
- Providers' names and surnames

4. Purpose and lawfulness of data processing

The purpose of data processing refers to scientific research, in particular IIT has identified a list of websites where scraping applications can be programmed to extract useful data. IIT, after a feasibility study, will conduct scraping activities on public and open-access websites in accordance with the EU Directive 2019/790 of the European Parliament. Data scraping of non-public websites will be carried out upon written authorization by the websites' publishers/owners. The legal basis of the processing of personal data is the legitimate interest of IIT to carry out scientific research (art. 6.1, let. f) of the Regulation.

In this regard, we inform that, as required by the Regulation, IIT has conducted a balancing test before the start of the processing, to determine if it was possible to use the legitimate interest as a legal basis. The aforementioned balancing test had had a positive result, pointing out that the processing does not infringe data subjects' rights.

5. Processing Method

Personal data will be processed by informatics assets, following the rules on protection of personal data, including those related to data security.

After the scraping phase the data collected will be temporarily stored on a secure network storage provided by IIT to make some local technical tests.

6. Access to personal data

Personal data will be processed by all the IIT scientific staff involved in the Tasks who have access to personal data acting under the authority of IIT.

7. Categories of recipients of personal data

Within the research activity, personal data will be transmitted to the RITHMS technical partners (acting as Data Controllers) for the following development and testing phases (via transfer to the secured OwnCloud hosted on the servers of the Bayern School of Police) and finally, only upon explicit authorization by the websites' publishers/owners (i.e., authorization letter or reference to the terms of use authorizing reproduction), they may be made available to the research community as an open-source dataset, pseudo-anonymized if requested. In any case, IIT remains responsible for communicating the data to Judicial Authorities, to handle the requests.

8. Extra EU data transfer

In case of transfer outside the European Union, IIT and the Project partners will comply with the obligation provided in the Standard Contract Clauses under Decision n. 914/2021 of the European Commission, under Chapter V, Article 46, par. 2, point c) of the GDPR, already shared and accepted by all the RITHMS Partners during the Consortium Agreement formalization.

9. Data retention and erasure

Personal data will be collected and stored in compliance with the storage limitation principle under GDPR and will be kept for no longer than necessary for the purposes for which they are processed (see Art. 5, par. 1, point e) of GDPR). In particular 5 years after the end of the project, unless IIT has been authorised to publish the collected data as an open-source dataset.

10. Rights of the Data Subject

Data subjects may exercise the rights provided in Articles 15 and seq. of the Regulation at any time sending an e-mail at dpo@iit.it. In particular, data subjects may request:
- access to personal data, as provided in Article 15 of the Regulation;
- rectification of personal data, as provided in Article 16 of the Regulation;
- erasure of personal data ("right to be forgotten"), as provided in Article 17 of the Regulation;
- restriction of personal data processing, as provided in Article 18 of the Regulation.

Finally, we remind that data subjects may object to the processing of personal data at any time, pursuant to Article 21 of the Regulation, on grounds relating to their particular situation.

11. Complaint with the Supervisory Authority

Finally, pursuant to Article 77 of the Regulation, we remind that data subjects have the right to lodge a complaint with a Supervisory Authority, if they believe that data processing infringes the provisions of the Regulation and the Decree.

12. Nature of the processing and mandatory nature of providing data

As specified in paragraph 3 of this information, the data are <u>necessary</u> for the proper working of Task 3.1 and Task 3.3 of the RITHMS project. Their provision is, therefore, mandatory in order to pursue the purposes indicated by IIT in paragraph 4 of this information.

13.   Existence of automated decision-making processes
There is NO type of automated decision-making process for the data processing, pursuant to Article 22 of GDPR.

Annex 1: Websites list

ID	WEBSITE NAME	OWNER/PUBLISHER	URL
01	Obiecte Furate	Romanian Police	https://www.politiaromana.ro/ro/obiecte-furate&page=1
02	Securius	[Germany] Federal Criminal Police Office (Bundeskriminalamt)	https://www.securius.eu/en/database/
03	Index of Damaged, Stolen, Missing or Illegally Exported Movable Cultural Objects	[Romania] National Heritage Institute (CIMEC)	https://furate.cimec.ro/Lista_en.asp
04	Mobile Cultural Objects Listed in the National Cultural Heritage	[Romania] National Heritage Institute (CIMEC)	https://clasate.cimec.ro/clasate_en.asp
05	The Places of Worship of Romania	[Romania] National Heritage Institute (CIMEC)	https://lacasuridecult.cimec.ro/EN/Documente/ASP/culte.asp?
06	National Archaeological Repertoire	[Romania] National Heritage Institute (CIMEC)	https://ran.cimec.ro/sel.asp
07	Museums and Collections from Romania	[Romania] National Heritage Institute (CIMEC)	https://ghidulmuzeelor.cimec.ro/Default.asp
08	Register of Experts for Mobile Cultural Heritage	[Romania] National Heritage Institute (CIMEC)	https://registru-experti-r1.cimec.ro/sel.asp?nr=1&NrSel=0&Lang=EN
09	Register of Archaeologists	[Romania] National Heritage Institute (CIMEC)	http://acera.cimec.ro/RegistruArheologi.aspx
10	The Complete List of Museum Professionals	[Romania] National Heritage Institute (CIMEC)	https://old.cimec.ro/scripts/MuzeeSpecialisti/sel.asp?nr=1&NrSel=0&Lang=EN

11	Register of Accredited Conservators and Restorators	[Romania] National Heritage Institute (CIMEC)	https://registru-conservatori-restauratori-r2.cimec.ro/sel.asp?nr=1&NrSel=0&Lang=EN
12	Works of Art - Illegal Art Trade	[Bosnia and Herzegovina] Ministry of Internal Affairs	https://mup.ks.gov.ba/aktuelno/potrage/umjetnine
13	Art Database	[Austria] National Fund of the Republic of Austria for Victims of National Socialism	https://www.kunstdatenbank.at/search-for-objects
14	National Stolen Art File	[United States of America] Federal Bureau of Investigation	https://artcrimes.fbi.gov/nsaf-view?crimeCategory=&b_start:int=100&searchText=
15	Tableau et dessin (TED) database	[France] Commission for the Compensation of Victims of Spoliation	https://www.culture.gouv.fr/Media/medias-creation-rapide-ne-pas-supprimer/base-ted-13.05.2024.xlsx
16	Stolen Cultural Assets Database	[Chile] National Cultural Heritage Service	https://recupero.patrimoniocultural.gob.cl/buscador
17	Museum of Looted Antiquities	Museum of Looted Antiquities	https://mola.omeka.net/
18	Object Registry	Association of Art Museum Directors	https://aamd.org/object-registry
19	Cultural Goods of the Second World War	[Netherlands] Cultural Heritage Agency	https://wo2.collectienederland.nl/search
20	Register of Protected Cultural Property and Collections	[Netherlands] Cultural Heritage Agency	https://data.collectienederland.nl/vc/wbc-2/search/?q=
21	Lost Treasures from Iraq	[United States of America] University of Chicago, Oriental Institute	https://oi-archive.uchicago.edu/OI/IRAQ/dbfiles/im_nos.htm
22	Lost Art Database	German Lost Art Foundation	https://www.lostart.de/en/start
23	Proveana	German Lost Art Foundation	https://www.proveana.de/en/search
24	The Central Registry of Information on Looted Cultural Property 1933-1945	Commission for Looted Art in Europe	https://www.lootedart.com/search2.php
25	Rose Valland (MNR-Jeu de Paume)	[France] Ministry of Culture	https://www.pop.culture.gouv.fr/search/list
26	Catalogue of Wartime Losses	[Poland] Ministry of Culture, Division for Looted Art	http://lootedart.gov.pl/en/product-war-losses/advanced-search?s=

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27	Reichskunstdepot Kremsmünster - Paintings, "K-List"	[Austria] Leonhard Weidinger	https://leonhard.weidinger.wien/daten/kremsmuenster-gemaelde
28	Einsatzstab Reichsleiter Rosenberg Collection	Claims Conference and the United States Holocaust Memorial Museum	https://www.errproject.org/jeudepaume/card_advanced_search.php
29	Linz Collection	German Historical Museum	https://www.dhm.de/datenbank/linzdb/
30	The Herman Goering Art Collection	German Historical Museum	https://www.dhm.de/datenbank/goering/
31	Max Stern Art Restitution Project	[Canada] Concordia University	https://www.concordia.ca/arts/max-stern/missing-works.html
32	Degenerate Art Database	[Germany] Free University of Berlin	http://emuseum.campus.fu-berlin.de/eMuseumPlus?service=ExternalInterface&lang=en
33	Database of Stolen/Missing Art in Bosnia and Herzegovina	[Bosnia and Herzegovina] Center Against Trafficking in Works of Art	http://www.cpku.org/baza-nestalih-umjetnina-the-database-of-missing-art/
34	Getty Provenance Index	[United States of America] Getty Research Institute	https://www.getty.edu/research/tools/provenance/search.html
35	Mona Lisa	[France] Ministry of Culture	https://www.pop.culture.gouv.fr/search/list
36	SHERLOC	United Nations Office on Drugs and Crime	https://sherloc.unodc.org/cld/en/v3/sherloc/cldb/index.html
37	Red Notices	INTERPOL	https://www.interpol.int/en/How-we-work/Notices/Red-Notices/View-Red-Notices
38	Press Releases	[United States of America] Manhattan District Attorney's Office	https://manhattanda.org/category/press-release
39	National Register of Accredited Experts in the Field of Movable Cultural Heritage	[Moldova] Ministry of Culture	https://dataset.gov.md/ro/dataset/14670-registrul-expertilor-acreditati-in-domeniul-patrimoniului-cultural-national-mobil
40	Encyclopedia	Trafficking Culture	https://traffickingculture.org/encyclopedia/
41	Works of Art	Phoenix Ancient Art	https://phoenixancientart.com/works-of-art/

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| 42 | Online Gallery | Hixenbaugh Ancient Art | https://hixenbaughancientart.com/gallery/ |