

PRIVACY POLICY

In compliance with articles 13 and 14 of EU Privacy Regulation 679/2016 ("GDPR") we inform you that the personal data provided by the data subject ("you") and/or acquired by Italian Exhibition Group S.p.A. ("IEG" or "We") in relation to the same, within the scope of its activities, are subject to processing in accordance with the principles of lawfulness, fairness, correctness, proportionality, necessity, accuracy, completeness and security and other applicable legal obligations, as further specified below.

Categories of interested parties. Processing operations and collection methods.

The data processed may relate to a) our suppliers, collaborators, partners, providers of work/services, contracting entities and contractors, exhibition and/or advertising space grantors, consultants, as well as bailors, bailees, lessor and lessees of spaces, agents, and b) persons who may potentially assume any of the above roles.

The categories of data collected (e.g. personal, identification, tax, economic and financial data) are indicated in our data collection forms or in the contract or in our online portal to which this information refers, and may also refer to internal contacts (e.g. legal representatives, directors, employees, etc.) or subcontractors of the organization to which they belong. Should you communicate to us data of third parties concerned, you must also guarantee that you have collected the consent of said third parties, if it is required by law.

The data collection takes place through a contract between the parties or through our online portal (**the "Platform"**). Only when taking part in an event (e.g. goldsmith's events) that requires the creation of an identification badge with a passport photo for security reasons pertaining to the premises and/or the goods that are on display to the public, your photograph may also be collected through a photo session carried out by operators authorised by us, at the entrance to our facilities. The processing will be carried out with electronic and hard copy tools with methods that relate to the individual purposes stated below.

The data collected may be processed by first- and second-level authorised persons who have been appointed by us in writing, who need to acquire the information when performing their work (e.g. legal offices, sales, marketing, administration, logistics, IT, management control, etc.).

Processing purposes.

The processing has the following purposes:

1. Profiling. Profiling is an activity that is subject to specific privacy obligations only if it analyses individuals, i.e. **sole proprietorships, partnerships or internal contacts** (e.g. functional area managers) **of corporations or other bodies or organisations**.

Profiling analyses the data provided by the interested parties themselves: name and surname, company name of the sole proprietorship or of the organisation to which it belongs, contact details of the company contact person (telephone, e-mail, availability times, etc.), residence or registered offices, place of provenance (street, municipality, post code, province, region, country), website, latest balance sheet to be attached optionally, company turnover (with drop-down menus divided by number segments); number of employees (with drop-down menus), external collaborators (with drop-down menus); active clients (with drop-down menus); corporate responsibility, and active certifications. This analysis is used by us to assess the suitability and robustness of the supplier with respect to our management requirements. Profiling is also carried out by third-party business partners on behalf of the IEG (e.g. sending emails via the cloud service of IEG providers).

Profiling allows us and the supplier to use the Platform for the activities we offer on it (e.g. online registration, registration in the suppliers' register and participation in tenders). Profiling does not prevent the interested party from freely exercising their rights, but it enables us to take decisions which in some cases may consist in our decision not to enter into a contract with the supplier.

2. Pre-contractual requirements (negotiations, exchange of commercial proposals, etc.) and/or **organisational management of any contract** which might have been entered into with you (supply, collaboration, partnership, provision of work or services, tendering, concession of exhibition and/or advertising space, consultancy, loan, rental, agency) **and of activities in general that are connected with the Event** to which the activities envisaged by the contract refer (e.g. planning and execution of services, management of relations with other suppliers, third party partners, event organisers and/or customers, (e.g. exhibitors, buyers, visitors, congress/meeting participants), communication of data to third parties involved in the Events (e.g. for security purposes, etc.).

3. Fulfilment of contractual obligations (supply, collaboration, partnership, provision of work or services, tendering, concession of exhibition and/or advertising space, consultancy, loan, rental, agency) **and/or provided for by law, regulations or EU legislation.**

Legal basis of the processing. Obligatory or optional provision of data and consequences of the failure to provide it.

The processing of data for purposes envisaged in **sub-clause 1** is based on our **legitimate interest** in assessing in advance and continuously the suitability and soundness of our suppliers or potential suppliers. Failure to provide the data requested by us will prevent us from profiling the supplier or the potential supplier, and the supplier or potential supplier from registering on the platform and using it.

During the Events, we and/or photographers and/or videomakers authorised by us take video footage (including voice recordings) and/or photographs on site to be published on our websites and social profiles relating thereto (e.g. Twitter, Facebook, Whatsapp, Youtube, Vimeo, etc.) and/or in brochures, catalogues and other printed material promoting the Events. These generic images concern Trade Fair Events that can be qualified as public events and are therefore processed, without your consent, for publication on our websites/landing pages, blogs and

social profiles (e.g. Twitter, Facebook, Whatsapp, Youtube, Vimeo, etc.) and on brochures, catalogues, flyers and other printed material promoting the Events. Only with your specific prior consent (which is the legal basis for the processing), given on site to our photographer and/or official videomaker, the images that portray you in a recognizable way are published, for the same purposes, on our aforementioned hard copy material or electronic/digital channels intended for the public. In the latter case, you may refuse to give your consent to our photographer and/or videomaker, thereby preventing us from processing them. By giving us your consent, you waive any financial consideration for the use of your image. You may at any time thereafter request the blurring of the face portrayed in the images published online, without prejudice to the lawfulness of the processing carried out prior to the date of blurring. We do not guarantee the pixilation on online channels of independent third party data controllers.

The processing envisaged in **sub-clause 2** has a legal basis in our **legitimate interest** to negotiate, and, after any conclusion, properly manage the contract, and to plan/manage all organizational activities that enable you/us to carry out the activities related to the contract and to cooperate in the Events effectively.

Only in the case of participation in events that, for particular security purposes of the premises and/or of the property that is exposed to the public, require the creation and delivery of an identification badge with your photograph, the latter is collected and processed by us. For these purposes we do not need to receive your prior consent.

You are in any case free not to provide the data requested by us, but in this case we will not be able to proceed with the negotiation and any possible execution of the contract. The legal basis of the processing is also our **legitimate interest** in ensuring the security of the Events against the risk of misconduct by third parties.

Processing as per **sub-clause 3** has its **legal basis** in our need to meet the obligations under the contract (supply, collaboration, partnership, provision of work or services, tendering, concession of exhibition and/or advertising space, consulting, loan, rental, agency) stipulated with you (and to perform all actions necessary for the correct and complete implementation of the commitments undertaken) and/or of the legal obligations related to it, and therefore does not require any prior consent of the data subject. You are free to refrain from providing us the data, but in this case we will not be able to conclude or continue the execution of the contract with you and/or fulfil the related legal obligations.

Communication and disclosure of data.

For the above mentioned purposes the data may be communicated to: suppliers of management and maintenance of computer systems, of our websites and databases, other suppliers who on our behalf perform services or provide products that are necessary and/or functional to the organization of Events, (e.g. photographers and/or videomakers who produce the audio visual material or carry out any related post-production work, journalists and newspapers, advertising, communication and/or public relations agencies, digital and hard copy publishing houses that produce our advertising or promotional material which is used to organize and manage the Events), third party business partners with whom we share the activity of creating and/or promoting the Events, private security companies and public security authorities, clients (visitors, exhibitors, buyers), and other guests at the Events.

The data can also be communicated to the Clients of the Events for the management of the same, as well as to lawyers, accountants, statutory auditors, providers of quality assurance services and independent auditors, for legal, accounting, financial reporting, certification of the quality management system, and for obtaining specific reports. Some data are communicated to labour consultants and consultants in the field of safety and hygiene in the workplace in order to allow the correct fulfilment of legal formalities (e.g. assessment of the risks of interference). These third parties will process the data in their capacity as external data processors (in this case in accordance with our written guidelines and under our supervision) or as independent data Controllers (in which case they will decide on the processing methods themselves).

Data transfer abroad.

Data are not transferred abroad. If the services of the supplier refer to the organization of Events located abroad, in this case we will indicate in writing the foreign countries and in particular Extra-EU countries to which this transfer will take place and the guarantees for such a transfer.

Duration of processing.

We process the data for 10 years from the date of collection of the data from the data subject. In the event of a dispute between you and us or our third party suppliers or customers, we will process the data for the time necessary to exercise the protection of our rights or those of our third party suppliers or customers, i.e. until 10 years after the issuance and full implementation of a legally binding measure between the parties or a transaction. Once this period has expired, the personal data shall be deleted, destroyed or made anonymous by means of appropriate security measures.

Rights of the data subject.

You have the right to:

- ask us **to confirm** whether or not personal data concerning you are being processed and, if so, to obtain **access** to the personal data and the following information:

a) the purposes of the processing;

- b) the categories of personal data concerned;
 - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular where they are recipients from third countries or international organisations;
 - d) where possible, the intended retention period for the personal data or, where that is not possible, the criteria used to determine that period;
 - e) the existence of the right of the data subject to request the controller to correct or erase the personal data or to restrict the processing of personal data concerning you or to object to their processing;
 - f) the right to lodge a complaint with a supervisory authority;
 - g) where data are not collected from the data subject, all available information on their origin;
 - h) the existence of an automated decision-making process, including profiling and, at least in such cases, significant information on the method used, as well as the importance and expected consequences of such processing for the data subject.
- where personal data are transferred to a third country or to an international organisation, the data subject shall have the right **to be informed of the existence of appropriate guarantees relating to the transfer**;
- request, and obtain without undue delay, **the amendment** of inaccurate data; taking into account the purposes of the processing, **the integration** of incomplete personal data, also by providing a supplementary statement;
 - request **the deletion** of data if :
 - a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - b) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
 - c) the data subject objects to the processing, and there is no predominant legitimate reason to proceed with the processing, or objects to the processing for direct marketing purposes (including profiling that is functional to such direct marketing);
 - d) personal data have been processed unlawfully;
 - e) personal data must be erased in order to comply with a legal obligation under EU law or the law of the Member State to which the Data Controller is subject;
 - f) personal data have been collected in connection with the provision of information society services.
 - request **the restriction** of the processing of your personal data where one of the following situations occurs:
 - a) the data subject contests the accuracy of the personal data, for as long as it is necessary for the controller to verify the accuracy of such personal data;
 - b) the processing is unlawful and the data subject objects to the deletion of the personal data and requests instead that their use be restricted;
 - c) although the controller no longer needs the data for the purposes of processing, personal data are necessary for the data subject to establish, exercise or defend a right in a court of law;
 - (d) the data subject has objected to the processing carried out for direct marketing purposes, while awaiting verification as to whether the legitimate reasons of the data controller prevail over those of the data subject;
 - to obtain from the data controller, on request, **the communication of information regarding the third parties** to whom the personal data have been transmitted;
 - **revoke at any time the consent** to the processing of his/her personal data if previously communicated for one or more specific purposes, it being understood that this will not affect the lawfulness of the processing based on the consent that was given before the revocation;
 - receive in a structured format that is commonly used and readable by an automatic device the personal data concerning you and provided by you and, if technically feasible, to have such data transmitted directly to another data controller without hindrance by us, if the following condition (cumulative) applies:
 - a) the processing is based on the consent of the data subject for one or more specific purposes, or on a contract/agreement to which the data subject is a party and to the execution of which the processing is necessary; and b) the processing is carried out by automated means (software) - overall right to so-called "**portability**". The exercise of the so-called right to portability is without prejudice to the right to cancellation provided for above;
 - **not be subject to a decision based solely on automated processing**, including profiling, **which produces legal effects concerning him/her or which significantly affects him/her in a similar manner**;
 - to lodge a complaint with the competent Supervisory Authority on the basis of the GDPR (that of its place of residence or domicile); in Italy it is the "Garante" (Data Protection Officer).

The data subject may exercise his/her rights by writing to the **Data Controller Italian Exhibition Group S.p.A., with registered offices in Via Emilia, 155 - 47921 Rimini (Italy)**, e-mail: **privacy@iegexpo.it**. The Controller has appointed Avv. Luca De Muri, who elected domicile for the office at the Italian Exhibition Group S.p.A., as Data Protection Officer.