

PRIVACY POLICY

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INTRODUCTION

This Privacy Policy (hereinafter the "Policy") is provided pursuant to the applicable personal data protection legislation, in relation to the personal data processed by the company ITALIAN EXHIBITION GROUP S.p.A. ("**IEG**") and/or by the Controlled Companies listed in the below [table](#) (the "**Controlled Companies**"), that:

- organize, host, also together with third-party partners, also in favor of third parties, events, exhibitions, conferences/congresses, workshops, webinars and/or business meetings, physical and/or virtual (the "**Events**"), or
- provide services and products (by way of example but not limited to: catering, set-ups, cleaning and portage, training, publishing, event services, etc.) (the "**Services**").

Personal data (the "**data**") are data consisting of any information that is connected or connectable to i) subjects qualifying as "**data subject**" pursuant to EU Regulation 679/2016 ("**GDPR**") (i.e., natural persons, individual companies and /or partnerships or other organizations with a restricted subjective basis to which the personal data refer) and/or ii) **other subjects substantially assimilated** to the interested parties by the EU or foreign data protection legislation applicable to the relevant processing.

Data processing includes, as appropriate, recording, organization, storage and processing operations on paper, magnetic, automated or telematic media, processing, modification, selection, extraction, comparison, use, interconnection between data based on qualitative criteria, quantitative and temporal, recurring or definable from time to time, temporary processing aimed at rapid aggregation or transformation of the data itself, communication, cancellation and destruction of data, or combinations of two or more of the aforementioned operations, based on what is necessary by the purposes referred to below.

Categories of interested parties and data collection

The data processed may concern **a)** suppliers, collaborators, partners, providers of work/services, contractors and contractors, licensors of exhibition and/or advertising spaces, consultants, as well as bailees, borrowers, lessors and lessees of spaces, agents, and **b)** subjects who can potentially take on one of the aforementioned roles.

The categories of data collected (e.g. personal data, identification, tax, economic-property and financial data) are indicated in the data collection forms or in the contract to which this information refers, furthermore they may refer to internal contact persons or subcontractors of the organization of the aforementioned categories of interested parties (e.g. legal representatives, directors, employees, etc.).

If the data subjects communicate data of third parties, they guarantee that they have obtained their consent, possibly necessary by law, in relation to such communication.

Data collection takes place through a contract stipulated between the parties or online form or by a contract between the parties or by our online portal (**the "Platform"**). Only in the case of participation in Events (such as goldsmith events) which, for reasons of safety of the premises and/or goods displayed there to the public, require the creation of an identification tag with passport photo, a photograph of the interested party may be collected also through a photographic session carried out by operators authorized by IEG or its Controlled Companies, at the entrance to their facilities.

The process will take place using electronic and paper tools and with logic connected to the individual purposes declared below.

The data collected may be processed by first and second level Authorized Persons, appointed in writing by IEG or its Controlled Companies, who need to become aware of it in carrying out their activities (e.g. legal, commercial, marketing, administrative, logistics offices, IT, management control, etc.).

Purpose of the treatment

The processing has the following purposes:

1. **Fulfillment of contractual obligations** (supply, collaboration, partnership, provision of work or services, contract, concession of exhibition and/or advertising spaces, consultancy, loan, rental, agency) and/or required by laws, regulations or by the various regulations applicable in the countries of the Controlled Companies.
2. **Pre-contractual requirements** (negotiations, exchange of commercial proposals, etc.) and/or **organizational management of the stipulated contract** (supply, collaboration, partnership, provision of work or services, tender, concession of exhibition and/or advertising spaces, consultancy, loan, rental, agency) and **activities in general connected to the Event/Service and/or Product** to which the activities envisaged by the contract refer (e.g. planning and execution of services, management of relationships with other suppliers, third-party partners, Event organizers and/or customers (e.g. exhibitors, buyers, visitors, congress/meeting attendees), communication of data to third parties involved in the Events (e.g. for security purposes, etc.).
3. **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 to assess the suitability and robustness of the supplier with respect to IEG's 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 enable IEG 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 IEG to take decisions which in some cases may involve choosing not to sign a contract with the supplier.

Legal basis of the processing. Mandatory or optional nature of providing data and consequences of failure to provide it.

Processing **sub 1** has a **legal basis in the need** for IEG and its Controlled Companies **to fulfill the obligations undertaken through the contract** (supply, collaboration, partnership, provision of work or services, contract, concession of exhibition spaces and/or advertising consultancy, loan, rental, agency) stipulated with the interested party and to carry out all actions functional to the correct and complete execution of the commitments undertaken and/or the fulfillment of the legal obligations connected to it; therefore it does not require any prior consent. The interested party is free not to provide the data; however, in this case it will not be possible to proceed with the stipulation or execution of the contract and/or fulfill the related legal obligations.

Processing **sub 2** has a **legal basis in the legitimate interest** of IEG and its Controlled Companies to negotiate, and, after any stipulation, adequately manage and organize the contract and to effectively plan/manage all organizational activities useful for the best execution of the contract.

In the sole case of participation in Events which, for particular security purposes of the premises and/or goods displayed there to the public, require the creation and delivery of an identification tag with the photograph of the interested party, the same will be collected and processed by IEG and by the Controlled Companies. For these purposes, no prior consent is necessary.

You are, however, free not to provide the requested data, but in this case, it will not be possible to proceed with the stipulation and execution of the contract. The **legal basis** of the processing is also our **legitimate interest** in guaranteeing the security of the Events with respect to the risk of crimes being committed by third parties.

During the Events, video recordings (including voice) and/or generic photographs are carried out on site by people appointed by IEG or Controlled Companies and/or by photographers and/or videomakers authorized by IEG or Controlled Companies. (filming of groups of people, of the flow of visitors during an event/demonstration, etc.) also intended for publication on the websites and social profiles of IEG or Controlled Companies (e.g. Twitter, Facebook, Whatsapp, Youtube, Vimeo, etc.) and/or on brochures, catalogs and other paper material promoting the Events/Services and/or Products.

These generic images, referring to trade fair events that can be classified as events of a public nature, are processed without the need for prior consent.

Processing **sub 3** has a **legal basis** in IEG's 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 IEG will prevent IEG from profiling the supplier or the potential supplier, and the supplier or potential supplier from registering on the platform and using it.

Communication and dissemination of data

For the aforementioned purposes, the data may be communicated to: suppliers of the management and maintenance service of IT systems, websites, platforms and databases, other suppliers who carry out services or provide necessary and/or functional products on behalf of IEG and Controlled

Companies to the organization of Events/Services, (e.g. photographers and/or videomakers who create video-audio materials or the related post-production, journalists and newspapers, advertising, communication and/or public relations agencies, digital publishing companies and paper that produce our advertising or promotional materials, used to organize and manage the Events), third-party commercial partners with whom the activity of creating and/or promoting the Events/Services is shared, private security companies and public security authorities or other Authorities of the countries pertaining to the Controlled Companies, customers (visitors, exhibitors, buyers, other guests invited to the Events).

The data may also be communicated to Customers for the management of Events/Services or for the purchase of Products, as well as to lawyers, chartered accountants, mayors, auditors, suppliers of quality certification services, independent audits, for needs of a nature legal, accounting, budgeting, quality management system certification, and for obtaining specific reports. Some data is communicated to labor and workplace safety and hygiene consultants to allow the correct fulfillment of legal formalities (e.g. assessment of interference risks).

These third parties may process the data as External Managers (in this case adhering to our written directives and under the supervision of IEG and/or Controlled Companies) or as independent Data Controllers (in this case deciding independently on the processing methods).

Data transfer abroad

If the supplier's services refer to the organization of Events (as better specified in the introduction) located abroad, IEG and the Controlled Companies will indicate, in writing, the foreign countries and in particular, the non-EU countries towards the which such transfer will take place and the guarantees that assist this transfer.

If the data transfer is carried out by IEG and/or Controlled Companies based in the EU to third party recipients based in the EU, this transfer is carried out following the appointment of an external data controller, as required by EU legislation.

If the data transfer is carried out by IEG and/or Controlled Companies based in the EU, to the following categories of third-party recipients based outside the EU (hereinafter the "importers"):

- Controlled Companies and/or their suppliers, with headquarters outside the EU (China, Singapore, USA, United Arab Emirates, Brazil, Arabia), to the extent necessary for pre-contractual, contractual and/or fulfillment of legal or regulatory obligations, for example, when IEG or the other Controlled Companies, based in the EU, transfer the data as agents in the interest of the foreign Controlled Companies;
- non-EU suppliers of online services for **i)** data collection with data subject-fillable text forms contained on landing pages provided by the Data Controller, **ii)** social platforms (U.S.A.) in which IEG and Controlled Companies social pages and/or profiles are active **iii)** log-in management with the user's LinkedIn social account, **iv)** analysis of traffic generated by users of the websites of IEG and/or other Group Companies (U.S.A.); **v)** electronic payment services; **vi)** CRM – Customer Relation Ship Management.

Such data transfer will take place against appropriate safeguards, such as:

In the case of **transfer to the U.S.A.**: the EU Commission's Adequacy Decision of July 10, 2023 regarding the U.S. data protection regulations as amended by the bilateral EU-U.S. "Trans-Atlantic Data Protection Framework" convention;

In the case of **transfer to non-EU countries other than the U.S.A.**: from the prior stipulation by IEG and/or EU-based Controlled Companies, towards the third-party importer, of standard contractual clauses - or so-called "CCS" - that comply as a minimum with the text approved by the EU Commission (unless supplemented and/or modified in a more favorable way to the data subject) by which, for the processing within its competence, the data importer undertakes to comply with privacy obligations substantially equivalent to those provided for by the relevant EU legislation.

The transfer of data, carried out by non-EU Controlled Companies, to IEG or non-EU entities, will take place against adequate guarantees, consisting of the stipulation, between the parties involved in the, transfer, of standard contracts or standard contractual clauses, conforming as a minimum to the texts approved by the competent Administrative Authorities of the country in which the individual foreign Controlled Companies is based (unless supplemented and/or modified more favorably to the data subject), or, where permitted by applicable law, conforming to the text approved by the EU Commission.

By means of such contracts and/or clauses IEG and/or the different data importer undertake to comply with obligations for the protection and processing of transferred personal data that are substantially equivalent to those set out in the relevant EU legislation.

Duration of treatment

Data are processed for **10 years** from the date of contracting.

In the event of litigation between the data subjects and IEG and/or the Controlled Companies, the data are processed for the time necessary to exercise the protection of the rights of IEG and/or the Controlled Companies and that is **up to 10 years after the issue** and full execution of a measure having the force of res judicata between the parties or a settlement. Once the above-mentioned respective duration has expired, the personal data shall be deleted, destroyed or anonymized by means of appropriate security measures.

Rights of the interested party

Interested parties, **using the contact details of the Data Controller** (viewable in the [Table](#) of IEG Group Companies), can exercise the **following rights**, provided for by the GDPR and/or by the different local legislation applicable from time to time in the country non-EU relevant in relation to data processing:

- **Access** to your personal data processed by the Data Controller,
- **Rectification** or integration of inaccurate or incomplete data,
- **Deletion** of obsolete data, where the Data Controller has not done so independently, in cases where (i) they are no longer necessary for the purposes of data processing, (ii) the interested party has revoked their consent to the processing of data for the where such consent is required by law, (iii) the interested party has objected to the processing of the data, (iv) the processing of personal data is unlawful, (v) the personal data must be erased to comply with a legal obligation in headed by the Owner. Each Data Controller undertakes to take all reasonable measures to inform the other companies in the IEG Group of the cancellation.
- **Limitation** of the processing of personal data, if (i) the accuracy of the personal data of the interested party is contested, to allow the Data Controller to carry out the necessary checks, (ii) the interested party intends to limit their personal data rather than delete them, although the processing is unlawful, (iii) the interested party wishes the Data Controller to retain the personal data as deemed necessary to defend themselves in legal actions, (iv) the interested party has opposed the processing but the Data Controller must carry out checks to ascertain the existence of legitimate reasons for the processing which prevail over rights of data subject.

- **Data portability** (i.e., to obtain a copy in machine-readable format of the data provided by the interested party to the Data Controller, or to have this copy communicated to another data controller indicated by the interested party, when the data refers to a contract existing between the interested party and the first Data Controller and the same are processed using software) within the limits established by the applicable legislation.

- **Opposition to processing carried out based on a legitimate interest of the Data Controller.**

- **Right not to be subject to an automated decision-making process** that produces legal effects that concern or similarly significantly affect the interested party and object to the **outcome of any automated decision of the Data Controller** relating to the processing of the interested party's personal data. Automated decision making occurs when decisions are made using technological means without human involvement.

This right does not exist when the automated decision i) is necessary for the conclusion or execution of a contract between the interested party and a data controller, or ii) is authorized by the law of the EU or the EU Member State to which the Data Controller is subject, which in that case also specifies appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, or iii) is based on the explicit consent of the interested party.

(Please note: the Data Controllers in any case do not make use of automated decision-making processes).

- **Revocation** of consent when consent by law is the legal basis of the processing (without prejudice to the lawfulness of the processing carried out up to the time of revocation).

- (when the GDPR is applicable) **Right to Complain** to the competent Supervisory Authority; in Italy it is the Guarantor for the protection of personal data – Piazza Venezia 11 - IT-00187 - Rome), tel. (+39) 06.69677.1, e-mail: rpd@gpdp.it.

- (when applicable legislation on the protection of personal data other than the GDPR) **Right to Complain, take legal action and/or alternative dispute resolution**, provided from time to time by the applicable foreign legislation (e.g. in the State of New Jersey, right to appeal against any rejection of a request to exercise the rights provided by the New Jersey Data Privacy Act, within a reasonable time after communication of the rejection and in a manner similar to that of the communication process of the first request; the Owner's response must be communicated within 60 days; in the event that the Owner rejects the appeal, the consumer can file a complaint with the New Jersey Division of Consumer Affairs in the Department of Law and Public Safety (see <https://www.njconsumeraffairs.gov/>)).

- **Right to request:**

- ✓ **to IEG** and/or to the Controlled Companies based in the EU space, as well as **to the Controlled Companies based in DUBAI, SAUDI ARABIA, SINGAPORE and/or the USA, a list of names of the third-party recipients of the data designated as external data controllers** (see also chapter "COMMUNICATION AND DISCLOSURE OF DATA" of this Policy), and

- ✓ **to the Controlled Companies based in CHINA and BRAZIL, a list of names of all third-party recipients of the data** (both External Managers and Data Controllers).

Below are the ways in which the interested party can **obtain further information** about their rights:

- if the interested party resides or is based in the **EEA area**, or in any case is subject to personal data processing regulated by the GDPR, they must consult for further details articles 15 to 22 and

77 of the EU Privacy Regulation 679/2016 ("GDPR "), available at the link:<https://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679#d1e2800-1-1>;

- if the interested party resides or is based in **China**, or is in any case subject to processing regulated by Chinese legislation for the protection of personal data, they must consult for further details articles 44 to 50 of chapter IV of the Data Protection Law personnel of the Republic of China (PIPL), available at the following link:http://en.npc.gov.cn.cdurl.cn/2021-12/29/c_694559.htm;
- if the interested party resides or is based in **Dubai**, or in any case is subject to processing regulated by the Arab legislation for the protection of personal data, for further details he must consult - the UAE - 'The Guide to Access Government Information' and Law No. 26 of 2015 on the Organization of Dubai Data Publication and Sharing also known as Law No. 26 of 2015 Regulating Data Dissemination and Exchange; and the Personal Data Protection Law, Federal Decree Law No. 45 of 2021 regarding the Protection of Personal Data) at the following link:<https://u.ae/en/about-the-uae/digital-uae/data/data-protection-laws>;
- if the interested party resides or is based in **Brazil**, or in any case is subject to processing regulated by Brazilian legislation for the protection of personal data, he must consult articles 17 to 22 of chapter III of the General Personal Data Protection Act (LGPD) , at the following link<https://lgpd-brazil.info>;
- if the interested party resides or is based in **Singapore** or is in any case subject to processing regulated by Singapore legislation for the protection of personal data, he must consult articles 5.1 to 5.2 of chapter V of the "The Personal Data Protection Act 2012 ("PDPA")" available at the following link: <https://www.pdpc.gov.sg/overview-of-pdpa/the-legislation/personal-data-protection-act>;
- if the data subject resides or is based in the **U.S.A.**, or is in any case subject to processing regulated by American legislation for the protection of personal data, he can consult the following [table](https://www.whitecase.com/insight-our-thinking/us-data-privacy-guide) of rights, the information available at the following link: <https://www.whitecase.com/insight-our-thinking/us-data-privacy-guide> and, in relation to the processing of personal data relating to subjects qualified as consumers (i.e. acting in an individual or family context) carried out by our Controlled Company based in the State of New Jersey (U.S.A.), the New Jersey Data Privacy Law viewable at the following link: https://pub.njleg.state.nj.us/Bills/2022/S0500/332_R6.PDF;
- if the data subject resides or is based in **Saudi Arabia**, or is otherwise subject to processing governed by Saudi Arabian data protection legislation, should consult the following link:<https://sdaia.gov.sa/en/Research/Pages/DataProtection.aspx>

DATA PROTECTION OFFICER

The DPO – Data Protection Officer of ITALIAN EXHIBITION GROUP SPA is Luca De Muri, domiciled at the same.

The DPO - Data Protection Officer of the Controlled Company IEG ASIA PTE LTD. – 1, Maritime Square # 09-56, Harbourfront Center – Singapore 099253, is Ilaria Cicero, domiciled at the same.