

Privacy Policy

Pursuant to the articles 13 and 14 of the EU Privacy Regulation 679/2016 ("GDPR") we inform you that the personal data provided by the interested party ("you"), for yourself or for the organization to which you belong, to Fieravicola Srl "we"), on the occasion of or in connection with events, exhibitions, events, conferences / congresses, championships / competitions and / or workshops (the "Events"), organized by us, hosted or participated also in collaboration with third-party partners, they are treated in compliance with the principles of lawfulness, fairness, correctness, proportionality, necessity, accuracy, completeness and security and other legal obligations in force.

Categories of interested parties. Processing operations and collection methods

The processed data concerns **customers** (ie exhibitors, visitors, buyers, conference / congress participants, event speakers, participants in championships / races and / or workshops, exhibition and / or advertising space dealers, organizers third parties and the sponsors who have played their respective roles over the last 10 years) and **prospects** (individuals who have expressed an interest in the Events over the last 10 years, including through the delivery of their own business card or request for information or quotes or by subscribing to newsletters, journalists, institutional guests / VIPs who have already taken part in the Events over the last 10 years), intended as natural persons over the age of 14 who act on their own and / or as internal contacts of legal entities, institutions or other organizations. The individual categories of data collected are indicated in our collection forms which supplements this information.

Data is processed electronically or on paper and in a manner that is compatible with the purposes specified below.

We collect data i) through online forms or paper forms or via pre-registration or participation app you filled in and / or acquired by third parties authorized by us or ii) via mobile devices such as tablets, smartphones present in the place of the Events or iii) by visiting card delivered by you.

The collected data will be recorded and retained on the servers managed by Fieravicola SRL and on those managed by Italian Exhibition Group S.p.A.

The data collected may be processed by the staff expressly authorized by us, within the limits strictly necessary for the performance of the respective activities assigned to it (eg legal, commercial, marketing, administrative, logistic, IT, management control, etc.).

Purpose of the processing

The processing has the following purposes:

- 1. Fulfillment of contractual and legal obligations** deriving from participation or connected to the already contractual or potential participation of the interested party in the Events.
- 2. Planning and organizational management of events**, eg issue and payment of securities, credits and entry passes (including check of payment termination by third-party services), management of personal identification tags (with photo ID) for security, planning and management of specific services requested by you (. set-up services, hotel booking and hospitality services, ticketing, translations, hostesses, catering, escorting), management of the contracts we stipulate with third-party suppliers of goods and / or services used by you during or during Events; publication of name and surname or company name and name, telephone number, fax, e-mail, website, in the public online and paper catalog of the Event in which you participate; communication, upon your request for pre-contractual information (eg programs, proposals, etc.) connected to the Events, drafting of invitation letters for consular visa applications.
- 3. Sending** (via email, ordinary mail, SMS, MMS, push-up messages, instant messaging functions such as whatsapp, telefax, telephone calls with operator, social networks and other automated tools) **of commercial communications, advertising and sales offers products / services related to those of your**

interest or relating to exhibition / congress and / or related products / services (eg sector publishing, championships / competitions, etc.) (overall activities defined as "soft spam").

4. Profiling. The profiling detects for privacy purposes only if it concerns natural persons, that is **individual companies or partnerships and relative partners / directors, or internal referents of corporations, institutions or organizations.**

The profiling uses some data supplied by you and sometimes associates them with company data taken from public databases (eg the Business Register of the Chamber of Commerce). For example, we treat the following data:

i) in the case of **exhibitors:** name and surname, business name of the organization to which they belong, contact details, residence or location, country of origin, website, sector of activity, types of product or service offered, annual promotional / advertising budget, type of distribution - store, department store, concept store, markets of interest, brand;

ii) in the case of **buyers/visitors:** name and surname, business name of the organization to which they belong, job attachment, level of professional responsibility, contact details, residence or location, country of origin, website, year of foundation of the company, turnover, employees number, sector of activity, percentage of business connected to Italy and to the foreign, Italian and foreign regions of interest, main categories of products or services of interest to the buyer and / or marketed by the same also as a percentage of sales by geographical area, categories of customers of the company, purpose of the visit;

iii) in the case of **journalists:** name and surname, contact details, sector and title, country of origin, language,

iv) in the case of **event / conference presenters / conference presenters:** name and surname, contact details, sector to which they belong, professionalism / topics covered.

In some cases, if you are a customer or a prospect, we associate the data you provide to us with your personal data acquired during your browsing on our websites or during the use of the services provided by these sites (eg cookies relating to pages of our website that you have visited, to the country from which you connect) or through other communication channels (eg social media) or through mass mailing of commercial e-mail (eg which messages have arrived, such as e-mails you have opened, what proposals you have accepted through specific actions such as opening an attachment or adhering to our request to link to landing pages or attachments to the email message, etc.).

The profiling allows us, in particular, to limit the sending to you of promotional communications not pertinent to your probable expectations and needs or through unwanted channels.

The limited nature of profiling does not exclude you from specific advantages or from the possibility to freely exercise your privacy rights, nor has any particular legal effects; in particular it does not in any way prejudice your ability to participate in the Events and / or take advantage of our services (eg online pre-registration, purchase of services).

5. Only with your separate consent: communication of data to our third-party partners (eg Italian Exhibition Group SPA, Cesena Fiera SPA, Fiera di Forlì, Event organizers, exhibitors or other operators active in the Events), **for autonomous direct marketing actions** related to goods / services concerning such third-party partners.

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

The processing for the purposes of **sub 1** has its **legal basis in our need to fulfill the obligations assumed** through the stipulated contract or to stipulate with you (and to carry out all the actions necessary for the correct and complete execution of the commitments therein) and / or to the legal obligations connected to it. Therefore **this treatment does not require your prior consent** and you are also free not to give your

data, however, in this case, we will not be able to stipulate the requested contract and / or regularly provide the service requested by you or by the organization to which you belong (eg make you participate in the Event of interest and provide you with related services) and / or we will not be able to fulfill the legal obligations connected with the contract.

The processing for the purposes of **sub 2** has its legal basis in our **legitimate interest** to organize Events, plan and manage all organizational activities useful to allow you to participate efficiently and effectively in Events and to manage relations with third party suppliers of functional and event-related goods and services.

In particular, the request for personal data and documents, especially for foreign guests, will make the correct understanding of the data more reliable, but above all, the reliability of the company that requires an entry visa is safer.

You are free not to provide the data, but in this case you will not be able to participate in the Event.

During the Events we are made by us and / or by photographers and / or videomakers authorized by us, video footage (including voice) and / or photographs. These generic images concern trade fairs that can be qualified as public events and are therefore treated, without your consent, for publication on our websites / landing pages and social profiles (eg Twitter, Facebook, Whatsapp, Youtube, Vimeo, etc.) and on brochures, catalogs, flyers and other printed material that promotes the Events.

In the event that, however, **the aforementioned images portray you in a recognizable way**, Fieravicola Srl may publish them for the same promotional purposes, on the aforementioned our printed materials or electronic / digital channels intended for the public (eg catalogs, brochures, flyers, websites / landing pages, blogs, social networks), **only with the necessary prior consent** (which is the legal basis of the processing), **issued on the spot to our official photographer** and / or videomaker.

In the latter case, you can deny consent thus inhibiting the aforementioned treatment; on the other hand, by giving us your consent, you expressly waive any financial compensation for using your image. You can request at any time the obscuring of the face portrayed in the images published online, without prejudice to the lawfulness of the processing operated up to the date of obscuration. Fieravicola Srl does not guarantee the obscuration of third-party autonomous data controllers on online channels.

The treatment for the purposes of **sub 3** (soft spam) **has its legal basis in our legitimate interest** in contacting our customers freely, as well as the prospects, in order to be able to offer them new opportunities relating to services through electronic / telephone / paper channels. products similar to those previously purchased / contracted (in the case of customers) or to those for which interest has been expressed (in the case of prospects), or relating to **products / services for exhibitions / conferences and / or related to them** (eg publishing of sector, championships / races, etc.). Therefore the cd. Soft spam, as described above, can lawfully take place even **without your prior consent**, which is therefore not necessary.

The treatment for the purposes of **sub 4** (profiling) **has a legal basis in our legitimate interest** to maintain and analyze a limited set of information concerning you, in order to be able to more effectively recontact you if you are our client or prospect. Given the limited data perimeter used in profiling, **it also occurs without his prior consent**, which is therefore not necessary.

The processing for the purposes of **sub 5** (transfer of data to third parties) takes place **only upon your specific express consent** (constituting, therefore, the legal basis of the lawfulness of the processing).

The consent requested may be freely denied by you, without prejudice to your right to participate in the events and / or to obtain the services requested by you.

Communication and dissemination of data

For the purposes under **sub 1 and 2** the data are communicated by us to: suppliers of the management and maintenance service of our IT systems, websites and databases, photographers and / or videomakers who make the video-audio materials or the related post production, journalists and newspapers, companies entrusted with services necessary for the organization and management of events (eg installation of fittings and equipment, publishers of paper and online catalogs, logistics, security, private security, first aid, hostesses, etc.), diplomatic representatives, consultants, banks (for the execution or receipt of payments connected to the Events), to Fieravicola Srl personnel authorized to process data (Communication, Travel, Sales, Marketing, etc.).

For the purposes under **sub 3 and 4** the data are communicated to: companies charged with marketing analysis, advertising, communication and / or public relations agencies, digital and paper publishing companies that produce our advertising or promotional materials, production companies of websites or blogs, web marketing companies, subjects in charge of the design and / or maintenance of promotional materials, IT management and maintenance companies, websites and databases used to organize and manage events, image agencies.

These third parties will process the data in the capacity of External Managers in accordance with our written guidelines and under our supervision.

For all the aforementioned purposes, we also communicate the data to third-party commercial partners (eg. Italian Exhibition Group Spa, Cesena Fiera Spa, Fiera di Forli Spa) who participate in the creation and / or promotion of the Events, which will treat the data as autonomous or co-titular or responsible owners. You can ask us for a list of co-owners, autonomous and responsible owners (see the "rights of the interested party" section of this information).

Transferring data abroad

In case of communication of data to third party recipients based outside the EU, the data transfer will take place against adequate guarantees, consisting of the prior stipulation by the third importer of a contractual agreement with us through which he, for the processing of its competence, undertakes to comply with privacy obligations substantially equivalent to those provided for by EU legislation at our charge (through the use of standard contractual clauses - or "CCS" - compliant at least with the text adopted by the EU Commission, except for any additions and / or changes more favorable to the interested party).

In some cases of data transfer to cloud suppliers based outside the EU, these suppliers are subject to the regulatory powers of local public authorities and in some situations, based on foreign legislation, (in the USA: the Federal Trade Commission, 'Article 702 of the FISA and the Executive Order EO 12333) the importer may be obliged to communicate the personal data transferred, in response to requests received from public authorities, to meet the national security requirements (e.g. anti-terrorism) or application of local law (with consequent possible access to data, of which the importer, based on local legislation, may not have to give notice to the exporter and the interested party, who will therefore not be able to exercise the relative rights normally recognized by the GDPR).

Therefore, in the abstract, the risk cannot be excluded that in certain and exceptional situations linked to the aforementioned specific requirements, the foreign public authority may process such data without applying substantially equivalent safeguards to those provided for by the GDPR to the data subject. However, the risk that the American public authority actually has an interest in applying local legislation to the data transferred appears to be reasonably negligible on the basis of the following circumstances:

- i) the performance of the exporter (Fieravicola SRL) in favor of the interested parties whose data the importer processes and the consequent data processing, have a limited object (the provision of exhibition services) and a limited purpose (the management of processes technical-organizational functional to the aforementioned services and the fulfillment of legal obligations); the performance does not involve the publication of personal opinions,

comments or similar information, nor the making available of services or products that can be used in activities against national security;

- ii) the types of personal data transferred are limited (eg personal, contact, contractual, administrative data); no particular categories of data are transferred (e.g. on political and religious opinions, biometrics); the categories of interested parties to which the data refer are limited (exhibitors, visitors, participants in Events, buyers, journalists, speakers) and they concern operators belonging to product or economic categories that are not reasonably relevant with regard to national security purposes (eg tourism, wellness, machine handling, sporting activities, and so on).

Therefore, Fieravicola SRL believes that the CCS applied in the relationship with importers (in particular the USA) effectively guarantee a protection of the rights of the interested parties substantially similar to that provided for by the GDPR, regardless of the application of any additional measures to the treatment in question.

The adoption of additional contractual measures by Fieravicola SRL towards importers (e.g. obligations to communicate public access, the right to suspend or cease the transfer and to terminate the contract with the importer, and the like), may be introduced at any time by the exporter upon the outcome of any information provided to operators by the EDPB - European Data Protection Board following the judgment of the Court of Justice of the European Communities (ECJ of 17 July 2020 which declared invalid in EU relations the bilateral agreement called "Privacy Shield") .

The transfer of data to the non-EU country takes place in any case also because it is necessary for the execution of i) a contract concluded between the interested party and Fieravicola SRL and / or pre-contractual measures adopted at the request of the interested party, or ii) a contract stipulated between Fieravicola SRL and another natural or legal person (e.g. our subsidiary, supplier, based outside the EU, etc.) in favor of the interested party.

Duration of treatment

In the case of the purposes **sub 1 e/o 2** we treat the data for **10 years** from date of the contract (in the case of customers) from the collection of the data of the interested party (in the case of prospects).

In the case of the purposes **sub 3 and 4** we treat the data for **10 years** from the collection of the data of the interested party (in the case of customers and prospects).

We process the data for a period of 5 years from the publication of the product in the case of promotion of editorial products.

We process the data for a period of **60 days**, after the end of each Event, in the case of data made available at collection points for requests for assistance, communicate to us by visitors and exhibitors (including insurance desk, Info point and Emergency Room).

We treat the data contained in the promotional catalog (paper and / or digital) of the individual Events for a maximum of **2 editions** of the catalog.

We treat certification data of the Events / Events up to the end of the certification and therefore until certification has taken place.

We treat the data necessary for the purposes of computer security (eg log-in registrations, failed logs and log-outs, when accessing restricted areas on the Fieravicola Srl websites related to the Events) for 1 year from collection. The recordings of the logs related to the reading of Fieravicola Srl online privacy information and the on-line actions (eg clicks, flags and the like) through which Fieravicola Srl is informed of the data subject's consent are kept for **10 years** from collection

In the event of a dispute between you and us or our third party suppliers process the data for **the time necessary to exercise the protection of our rights** or those of the third party suppliers, that is up to the

issue and full execution of a provision having the value of a res judicata between the parties or of a transaction.

The data connected to the "Business Matching" service provided during the Events are treated for 3 months from the end of the single Event to which they refer.

The data related to the drafting of invitation letters for the request of consular visas (eg. Copy of the passport, etc.) are processed for **3 months** from the end of the single Event to which they refer.

Once the aforementioned maximum duration has ceased, the personal data are definitively destroyed or made totally anonymous.

Rights of Data Subject

You have the right to:

- ask us to **confirm** whether or not a processing of personal data concerning you is in progress and, in this case, to obtain **access** to personal data and the following information: a) the purposes of the processing; b) the categories of personal data in question; c) the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if they are recipients of third countries or international organizations; d) when possible, the period of storage of personal data provided or, if this is not possible, the criteria used to determine this period; e) the existence of the data subject's right to request the data controller to rectify or delete personal data or limit the processing of personal data concerning him or to oppose their processing; f) the right to lodge a complaint with a supervisory authority; g) if the data is not collected from the interested party, 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 logic used, as well as the expected importance and consequences of such treatment for the data subject.

- if personal data is transferred to a third country or an international organization, the data subject has the right **to be informed of the existence of adequate guarantees relating to the transfer**;

- request, and obtain without undue delay, the **correction** of inaccurate data; taking into account the purposes of the processing, the **integration** of incomplete personal data, also providing a supplementary declaration;

- request **deletion** of data if: a) personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed; b) the data subject revokes the consent on which the processing is based and there is no other legal basis for the processing; c) the data subject opposes the processing, and there is no prevailing legitimate reason to proceed with the processing, or he opposes the processing carried out for direct marketing purposes (including the functional profiling of such direct marketing); d) personal data have been unlawfully processed; e) personal data must be deleted in order to fulfill a legal obligation established by Union law or the Member State to which the data controller is subject; f) personal data has been collected regarding the offer of information society services.

- request the **limitation** of the processing that concerns you, when one of the following hypotheses occurs: a) the data subject disputes the accuracy of the personal data, for the period necessary for the data controller to verify the accuracy of such personal data; b) the processing is unlawful and the data subject opposes the deletion of personal data and requests instead that its use be limited; c) although the data controller no longer needs it for the purposes of processing, personal data is necessary for the data subject to ascertain, exercise or defend a right in court; d) the person concerned has opposed the processing carried out for direct marketing purposes, pending verification regarding the possible prevalence of the legitimate reasons of the data controller with respect to those of the interested party;

- to obtain from the data controller, upon request, the **communication of the third-party** recipients to whom the personal data have been transmitted;

- **revoke at any time the consent** to the processing where previously communicated for one or more specific purposes of one's personal data, it being understood that this will not prejudice the lawfulness of the processing based on the consent given before the revocation.

- receive in a structured format, commonly used and readable by automatic device, the personal data concerning you provided by you and, if technically feasible, to have these data transmitted directly to another data controller without hindrance on our part, if necessary the following (cumulative) condition:
a) the processing is based on the consent of the interested party for one or more specific purposes, or on a contract to which the interested party is a party and to whose execution the treatment is necessary; and
b) the processing is carried out by automated means (software) - overall right to the c.d. "**Portability**." The exercise of the right c.d. portability is without prejudice to the right to cancellation provided above;

- **not** be subjected to a **decision based solely on automated processing**, including profiling, **which produces legal effects that concern him or that significantly affects** his person.

- lodge a complaint with the competent control authority based on the GDPR (that of its place of residence or domicile); in Italy it is the Data Protection Authority.

You can exercise your rights by writing to the Data Controller Fieravicola Srl with registered office in Via Emilia, 155 - 47921 Rimini (Italy), e-mail address: privacy@fieravicola.com

The Legal Representative of the company or the Representative of the organization undertakes to communicate this Information to the other subjects belonging to the company or to the organization itself and of which it declares to legitimately supply the relative data. Likewise, the consent given for the purposes sub 5 by the Legal Representative of a company or by the Representative of an organization is also extended **to other subjects belonging to the company** or to the organization itself.

