

**Subject: Information on the processing of personal data, pursuant to Article 13, EU Regulation No. 2016/679 - "GENERAL DATA PROTECTION REGULATION" (hereinafter "GDPR") and Legislative Decree No. 196/2003, supplemented by Legislative Decree No. 101/2018.**

With this information notice, we would like to inform you of the manner in which the companies L"ASTEMIA and TENUTE DEL VINO (hereinafter also collectively referred to as the Companies or Joint Owners) process your personal data, which you have communicated at the time of your participation in an organised event.

Where not specified, all articles of law cited in this document refer to the GDPR.

### 1) Data controller

Joint data controllers are the companies

- L"ASTEMIA S.R.L., with registered office in Via Crosia 40 in Barolo (CN - 12069) and VAT no.: 03203200047
- TENUTE DEL VINO S.R.L., with registered office in Via Alba, 26 in Barolo (CN - 12069) and VAT no.: 02929850044, who have signed a co-ownership agreement.

### 2) Appointment of DPO

Since the co-owners do not fall under the cases indicated in Art. 37 of the GDPR, nor under those indicated in the various interpretations of the Data Protection Authority, they did not consider it necessary to appoint a Data Protection Officer.

### 3) Subject of the processing

The processing concerns data that companies use to organise the event in the best possible way, and to provide you with the best possible service. Depending on the type of event organised, this involves:

1. personal data (Name, Surname) and contact details (e-mail address)
2. logistical data that may be required to manage timetables, shuttles, flights, hotel rooms, etc. (e.g. the location from which you wish to depart for the event, or the time at which you will arrive)
3. possibly a copy of your ID, should the Joint Owners use it to book a flight or hotel
4. information on your size, should clothing be provided
5. information on your food intolerances, allergies or food-related illnesses, should the provision of meals be envisaged
6. **photographs and audio/video recordings of you during the event (limited to those taken by the Companies under their own ownership)**
7. data included in the feedback you wish to give at the end of the event

It is important to note that **NOT ALL DATA IS NECESSARILY COLLECTED AT EVERY EVENT**. In general, only the data referred to in point 6 are processed at every event organised, while other processing, although codified internally, is sporadic. **IT IS ALSO POSSIBLE THAT SUCH DATA MAY BE COLLECTED AND PROCESSED BY SUBJECTS OUTSIDE THE COMPANIES**, such as companies involved in the organisation of events or PR, catering, etc., and which act as autonomous data controllers.

### 4) Purpose of the processing, legal basis, nature of the provision.

The personal data referred to in points 3.1, 3.2, 3.3 and 3.4 are collected for the sole purpose of making it possible for you to participate in the event you are registering for.

If the event includes a registration form, this will indicate which data is compulsory and which is optional, varying according to the type of event. In the case of compulsory provision of data, processing is lawful pursuant to Art. 6, para. 1, letter b) of the Regulation and does not require your explicit consent. Failure to provide compulsory data will make it impossible for the Companies to accept your participation in the event.

In the case of optional provision of data, processing is lawful pursuant to Art. 6, para. 1, letter f) and does not require your explicit consent. The non-disclosure of optional data has no direct influence on your participation in the event, but it does affect the level of service that the Companies will be able to offer you.

Your e-mail address may be collected and used to send you a request for feedback (see 3.7 of this policy). In the feedback request, there may be a request for authorisation to contact you for promotional activities of various kinds. The acquisition of your e-mail address specifically for this processing purpose is lawful in accordance with Art. 6, para. 1, letter a) and requires your explicit consent, which will be requested from you at the same time in the feedback form.

The personal data referred to in point 3.5 are acquired for the sole purpose of being communicated (in aggregate and anonymous form) to the manager of the event's food service (catering, restaurant, etc.) so that he can prepare the service taking into account your food requirements. Since this data is of a special nature, the processing is lawful pursuant to Art. 9, para. 2, letter a) and requires your explicit consent.

If consent for this processing is not given or the information is not communicated or is incorrect/incomplete, your dietary needs cannot be catered for, nor can the Joint Owners be held liable in the event that you suffer a dietary harm of any kind.

Furthermore, the Joint Owners shall not be liable and shall pass this liability on to the food service provider if the latter, although correctly informed of your dietary requirements, fails to provide for your dietary requirements in an appropriate manner, thereby causing you harm.

The personal data referred to in point 3.6 is acquired for internal purposes, documentation and promotion of the event in which you participate and of the Companies themselves.

In the case of public events, or events in which a large number of people generally participate, the processing is legitimate in accordance with Art. 6, para. 1, letter f) and draws its lawfulness from Articles 96 and 97 of the Copyright Protection Act. In the case of private events and events with a limited number of participants, the processing is lawful pursuant to Art. 6, para. 1, letter a) and requires your explicit consent, which is requested before or at the beginning of the event itself by means of a specific release.

If consent is denied, the Joint Owners shall take care to exclude you, possibly even in post-production, from photographs and audio/video recordings of details in which your image is recognisable. This shall not apply to panoramic photographs or filming or to photographs in which Your image is not recognisable.

**THE JOINT OWNERS DISCLAIM ANY LIABILITY FOR PHOTOGRAPHS AND FILMING CARRIED OUT INDEPENDENTLY BY THIRD PARTIES (E.G. COLLEAGUES WITH SMARTPHONES, OR OTHER COMPANIES PARTICIPATING IN THE SAME EVENT) WHO WILL PROCESS SUCH FILMING INDEPENDENTLY AND UNRELATED TO THE COMPANIES.**

The personal data referred to in point 3.7 is acquired for internal purposes, for statistical purposes and to improve the service offered. For this purpose only, data may be collected anonymously, but should you wish to make yourself known, your data would be processed in accordance with Art. 6, para. 1, letter f), not requiring your explicit consent. This data may be used as a reference, for institutional and promotional communication purposes. In this case it is collected in a known form, and its use for this purpose is lawful under Art. 6, para. 1, letter a), requiring your explicit consent.

## 5) Processing method, processing duration

The personal data referred to in 3.1, 3.2, 3.3, 3.4 and 3.5, for the purposes referred to in point 4, is collected and processed electronically, by means of an online form managed by Google. The data collected is only used until the purpose for which it was collected is fulfilled (typically the end of the event) after which it is deleted.

Specifically, this data is subject to collection, recording, organisation, selection and extraction, use, deletion and destruction.

The data referred to in point 3.6, for the purposes referred to in point 4, is collected and processed electronically, by means of acquisition devices, and is subsequently recorded on the Company servers, in folders available to the HR and Marketing departments, to be used for the purposes expressed. The storage of such data is functional to the needs of the departments for which it is intended, and therefore has a variable duration, in any case until obsolescence.

Specifically, such data is subject to collection, recording, organisation, selection and extraction, use, deletion, destruction.

The data referred to in point 3.7 is collected for the purposes indicated in paper form, and subsequently digitised, and archived in dedicated folders on the company servers, while the paper data is destroyed. For both purposes, this data is processed for a period of 5 years from its acquisition, after which time it is subject to re-evaluation. It is deleted if it is deemed obsolete, otherwise it is kept for another 5 years.

## 6) Data Access

Your data may be made accessible for the purposes referred to in point 4) to employees and collaborators of the Joint Owners, authorised to process and/or system administrators, or to third party companies or other parties authorised by the Data Controller, in their capacity as external data processors. These processors undertake to implement all appropriate security systems to protect your data, and adhere to a protocol of security procedures and policies that the Controller has produced and constantly updates.

## 7) Data Communication

Without the need for express consent (ex art. 6 lett. b), c) of the GDPR), the Joint Owners may communicate your data to Supervisory Bodies, Judicial Authorities, insurance companies for the provision of insurance services, as well as to those subjects to whom communication is compulsory by law for the fulfilment of the aforementioned purposes. These subjects will process the data in their capacity as autonomous data controllers. Your data will not be disclosed, except for the passive dissemination envisaged by publication on the website (as per point 3.4).

The data referred to in point 3.1, for the purposes expressed in point 4, will be communicated to entities supporting the disbursement of funding dedicated to training (e.g. Fondimpresa), or directly to the disbursing entities, for the purpose of obtaining the funding provided.

#### **8) Data transfer to non-EU countries**

The data provided under point 3) is stored electronically in the cloud, on the software for managing the newsletter, and in paper format in archives located at the offices of Via Alba 26 in Barolo.

It is in any case understood that the Data Controller, should it become necessary, shall have the right to move the servers also outside the EU, for example in the case of use of Cloud services. In this case, the Data Controller assures you as of now that the transfer of data outside the EU will take place in compliance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

#### **9) Rights of the data subject**

As a data subject, you enjoy the rights set out in Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail:

- Right of access
- Right to correct
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to Obligation to notify in case of correction or erasure of personal data or restriction of processing
- Right to data portability
- Right to object
- Rights relating to automated decision-making concerning natural persons, including profiling

#### **10) Procedures for exercising the rights of the data subject**

You may exercise your rights at any time by sending:

- a registered letter with acknowledgement of receipt addressed to the Data Controller, referred to in point 1)
- an e-mail to [privacy@astemiapentita.it](mailto:privacy@astemiapentita.it)

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