

## PRIVACY POLICY

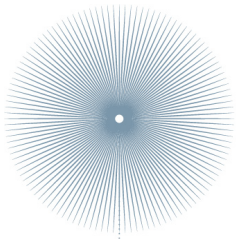
Dear Sir/Madam (hereinafter the Data Subjects)

*The following paragraphs provide a series of information useful to understand how we process personal data, in compliance with the provisions on data protection and the principles of lawfulness, fairness, transparency, purpose limitation and storage, data minimization, accuracy, integrity and confidentiality.*

*Therefore, we encourage you to read this policy carefully, specifying that in order to obtain complete information about the processing of personal data by POLI.design, data subject are invited to view the [privacy page](#) of the website.*

### 1. DEFINITIONS

<b>Privacy legislation (applicable to the protection of personal data)</b>	Set of all legislation referring to the protection of personal data: EU Regulation 679/2016 (GDPR or RGD), D.Lgs. 196/2003 (Code), D.Lgs. 101/2018, D.Lgs. 51/2018, Guidelines of the EDPB (formerly WP29), deontological rules and general authorizations of the Data Protection Authority, measures of the Data Protection Authority where applicable, international regulations of scope
<b>Processing</b>	Any operation or set of operations, performed whether or not by automated means, applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission/dissemination or any other form of making available, comparison or interconnection, restriction, erasure or destruction.
<b>Data Controller</b>	The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of the processing of personal data.
<b>Personal Data</b>	Any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is any natural person who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more characteristic elements of his or her identity: physical physiological, genetic, mental, economic, cultural or social.
<b>Special categories of personal data (formerly sensitive)</b>	Personal information relating to ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health status, life or sexual orientation of the data subject, as well as genetic, biometric and geo-location information.
<b>Data related to criminal convictions and offenses</b>	Personal information related to criminal convictions, felonies, or related security measures.



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## 2. THE DATA CONTROLLER

POLI.design Srl (hereinafter POLI.design) - located in Via Don Giovanni Verità n. 25, 20158 Milan; VAT number 12878090153 – is the Data Controller, in the person of the pro-tempore Legal Representative, of your personal data as defined in the **DEFINITIONS** paragraph of this document. For any information you may contact him at the e-mail address [privacy@polidesign.net](mailto:privacy@polidesign.net).

The Data Controller has proceeded to identify and appoint a Data Protection Officer or Data Protection Officer (hereinafter DPO), who is available at the e-mail address [dpo@polidesign.net](mailto:dpo@polidesign.net).

## 3. ORIGIN OF YOUR DATA and CATEGORY OF DATA COLLECTED.

The data being processed are those you provide with regard to participation to an event or initiative promoted by the Data controller. The data collected are first name, last name, e-mail address telephone number and other personal and contact data as well as images that may have been collected at the event.

## 4. PURPOSE OF THE PROCESSING and LEGAL BASIS OF THE PROCESSING.

### A. *Enrollment and participation*

POLI.design processes your personal data that you voluntarily provide to us, such data are collected and processed on the basis of the execution of pre-contractual measures and subsequent contractual fulfillments for the purpose of:

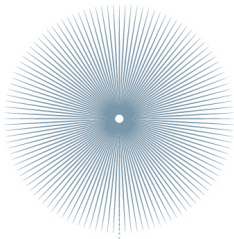
- respond to specific contact requests;
- enable your participation in the event;
- organize your participation in the event.

### B. *Soft Spam*

In some cases, following your demonstration of interest or following your registration, the Data Controller may send you communications, for example, to get your opinion about the event itself, or to propose similar initiatives. In this case POLI.design will act by virtue of legitimate interest.

### C. *Marketing*

The data are also used for POLI.design marketing purposes but only in the presence of express consent. In this regard, please note that consent can be revoked at any time without affecting the legitimacy of the processing carried out prior to the occurrence of such revocation.



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#### D. *Images*

Your images may be collected and processed by POLI.design for advertising and marketing purposes. These are photos and videos collected for the purpose of publication on POLI.design's official channels and any brochures. Such processing may take place only by virtue of express consent.

#### E. *Sharing with Partners*

POLI.design shares your data with the partner companies organizing the event (who may act as co-owners or as external data processors), and this is done in order to fulfill contractual obligations, as the event is co-organized.

### 5. MANDATORY REPORTING OF DATA

The provision of the personal data requested, is not mandatory for the purposes described in the paragraph **PURPOSE OF THE PROCESSING and LEGAL BASIS** of this policy, however, in the absence of the requested data it is possible that POLI.design will not be able to properly provide the service requested. With regard to the processing carried out by virtue of consent (and, therefore, the collection and publication of images and contact for marketing purposes) the same are possible only in the presence of your specific consent. Without it, we would not be able to proceed with the processing under consideration, without, however, hindering your participation in the event. Please note that consent is never compulsory and that, even once given, it is revocable at any time, without affecting the processing carried out in its force.

### 7. PLACE OF DATA PROCESSING and MODALITIES OF DATA PROCESSING.

Your data are processed within the European Union. All processing operations are carried out by means of IT/electronic tools, including automated tools, and on paper. In case of transfer to non-EU territory, the Data Controller will take care to adopt all the guarantees provided by the GDPR in this regard.

### 8. COMMUNICATION OF YOUR DATA TO THIRD PARTIES

**PERSONS AUTHORIZED TO PROCESS:** These are internal figures, specifically partners, employees and collaborators of POLI.design who collect or process your data by reason of their respective duties and according to the profiles assigned to them.

**DATA PROCESSORS:** these are third-party collaborators who process data on behalf of POLI.design through the stipulation of a special agreement of appointment as Manager, by means of which the operations delegated to the third party are defined, as well as the security measures that the third party must adopt in order to best protect the information it obtains from the same Data Controller. In particular, your data could be processed by:

POLI.design  
Società consortile  
a responsabilità limitata

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C.C.I.A.A. Milano 192631  
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Event organizers;  
Partner companies;  
Cloud services for registration management and communications;

Hosting service for registration collection;  
Communication agencies;  
External companies with whom we collaborate.

The list of third parties appointed as Data Processors is available at the office, and can be shown to Data Subjects upon special request.

## 9. RETENTION PERIOD OF COLLECTED DATA

Personal data collected at events will be retained for a limited time in relation to the purpose and usually for no more than 2 years. Contractual and accounting data will be retained for 10 years. Data collected for marketing or generally by virtue of appropriate consent will be retained until opted out unless the purpose is exhausted.

## 10. YOUR RIGHTS

The Data Subjects have the right to obtain, in the cases provided for, access to their personal data and the rectification and/or cancellation of such data and/or the limitation of the processing that concerns them and/or to oppose the processing (Articles 15 et seq. of the GDPR). The appropriate request is to be submitted directly to POLI.design at the contact details indicated in the paragraph **DATA CONTROLLER** of this policy. The Data Subjects who believe that the processing of personal data, carried out according to the methods indicated herein, takes place in violation of the provisions of the GDPR, have the right to lodge a complaint with the Supervisor Authority, as provided for in Art. 77 of the GDPR itself, or to take appropriate legal action (Art. 79 of the GDPR).