

## PRIVACY INFORMATION FOR POLTRONESOFÀ MADRID CONVENTION

Poltronesofà S.p.A. is the holder of the licence to use the POLTRONESOFÀ MADRID App (hereinafter referred to as the "App"), through which, addressing its employees or authorised persons, upon invitation and prior registration (hereinafter referred to as "Guests-Users"), it provides information and documents that are useful and necessary for taking part in the company event "Convention Poltronesofà 2018", with its programme (hereinafter referred to as "Event").

By means of this document, Poltronesofà S.p.A. ("**Controller**" or "**POLTRONESOFÀ**") provides this information pursuant to art. 13 and subs. of EU Regulation 679/2016 to describe the processing of Guests-Users' personal data collected by accepting the invitation to participate in the Event and subsequent registration to the App and its usage (hereinafter referred to as the "Platform").

### 1. TYPES OF DATA AND PROCESSING

1 Following the acceptance of the invitation to take part in the Event and the participation, we process:

a) personal data provided on a voluntary basis by the Guests-User: here are the processed data: name and surname, e-mail address, address of residence, telephone number, tax code, ID number and if deemed necessary by the Guests-Users based on their needs, also data about the health condition (e.g. food intolerances, allergies, special dietary regimes, movement restrictions with the need for assistance, etc.). Creating an *account* on the Platform involves the processing of such data for the optimised and customised management of services for the Guests-Users.

b) images and voice of the Guests-Users for the creation of audio, video and photo material: during the Event video, audio and photo material of the Event will be acquired; this material can exclusively be used only to keep a record of the Event or, possibly, to be shared exclusively among the Guests-Users and people authorized by the Controller .

### 2. PURPOSE AND LEGAL BASIS FOR PROCESSING

The Guests-Users' data collected will be processed by the Controller:

- To pursue, in accordance with art. 24.1, letter g) of the Code and 6.1, letter f) of the Regulation, its own legitimate interest, consisting in guaranteeing the security of the App and the information exchanged on it, i.e. the App capacity to withstand, at a given security level, unforeseen events or unlawful or malicious acts that compromise the availability, authenticity, integrity and confidentiality of the personal data stored or transmitted and the security of the related services offered or made accessible;

- To allow Guests-Users to open an *account* on the Platform pursuant to art. 24.1, letter b) of the Code and 6.1, letter b) of the Regulation;

- To provide the services integrated in the App through the information and documents that are useful and necessary for the participation in the Event pursuant to art. 24.1, letter b) of the Code and 6, letter b) of the Regulation;

- To store images of the event and create audio-visual and/or photographic content (hereinafter referred to as "Contents") for sharing purposes with the Guests-Users and/or for training and improvement of the corporate event and/or services. The processing of the images and voice of the Guests-Users, as present in the Contents is put in place pursuant to the request of the Guests-Users to take part in the Event, pursuant to art. 24.1, letter b) of the Code and 6, letter b) of the Regulation;

For the above purposes, personal data will be processed for the period strictly necessary for the pursuit of organizing and managing the Event and also subsequently, limitedly to the identification data of Guests-Users, for the performance of legal obligations and administrative purposes. Therefore, for the purposes of proper data processing, it is necessary that the person concerned promptly notify any changes. Once the Event is concluded, the App will be disabled.

### **3. METHODS OF PROCESSING**

Processing will be carried out both on paper and by computerised means, with the help of modern computer systems and manual methods, only by persons expressly appointed to do so. Processing will be carried out with logic and through forms of data organisation being strictly related to the obligations, tasks or purposes mentioned above. The Controller uses technical and organisational measures to protect the data in its possession from manipulation, loss, destruction and against access by unauthorised persons. Security measures are constantly being improved in line with technological developments.

### **4. MANDATORY OR OPTIONAL NATURE OF DATA PROVISION**

Even if data provision is optional for the purposes referred to in point 1, the latter is necessary to allow Your participation in the Event and its proper conduct. Therefore, in case of refusal, Guests-Users will not be able to take part in the Event.

### **5. SCOPE OF COMMUNICATION AND DISSEMINATION**

The Data Controller processes data either directly or by making use of other subjects acting as Officers belonging or not to the corporate structure. If necessary, the data collected may be communicated, within the limits strictly pertinent to the obligations, tasks or purposes referred to in point 2, to public or private entities (couriers, carriers or shippers, insurers, auditing and certification companies, etc.) or to the competent authorities for the purposes of prevention, detection or prosecution of crimes, in compliance with the rules governing the matter. No data will be disseminated.

### **6. PROCESSING CONTROLLER**

The Data Controller is **Poltronesofà S.p.A.** with registered office in Via Lunga n.16, 40053 Valsamoggia, Crespellano (BO) ITALY and administrative office in Via Raffaele Bendandi, 14, 47122 Villanova di Forlì (FC) ITALY, Tax Code and VAT number 03613140403. The complete list of Officers in charge is available at the registered office of the Data Controller.

### **7. DATA PROTECTION OFFICER**

Poltronesofà has appointed a Data Protection Officer who can be contacted by email at [dpo@poltronesofa.com](mailto:dpo@poltronesofa.com)

### **8. USER'S RIGHTS**

In accordance with art. 15 and subs. of the Regulation, the Guest-User has the right to obtain:

- a. The confirmation of the existence or not of personal data concerning him/her, even if not yet recorded, and its communication in an intelligible form;
- b. A copy of his/her personal data;
- c. The indication of: personal data origin; the categories of personal data processed; processing purposes and methods; the logic applied in case of processing carried out with the help of electronic means; the controller and possible officers' identity; the storage duration of his/her personal data or the criteria used to determine such period; the subjects or categories of subjects to whom personal data may be

communicated or who can learn about it as appointed representative in the national territory, officers or agents, pursuant to art. 4 of the Regulation

d. Data update, rectification or, where interested therein, integration; cancellation, transformation into anonymous form or blocking of data unlawfully processed, including data whose retention is unnecessary for the purposes for which data was collected or subsequently processed; certification stating that the operations as per the foregoing points have been notified, as well as their contents, to those to whom data was communicated or disseminated, unless this requirement proves to be impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

e. The interested party has also the right to oppose, in whole or in part: for legitimate reasons, the processing of personal data concerning him/her, even if pertinent to the purpose of collection; the processing of personal data concerning him/her for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication.

With specific reference to the processing of data referred to in paragraph 1, letter b, the Controller points out that the Guest-User has the right to revoke his/her consent at any time, without prejudice to the lawfulness of the processing based on the consent given before revocation.

## **9. EXERCISE OF RIGHTS**

To exercise the above-mentioned rights, Guests-Users can send a communication to the e-mail address [infoprivacy@poltronesofa.com](mailto:infoprivacy@poltronesofa.com), indicating in the subject line "*Privacy - Exercise of rights under art. 15 and subs. of the Regulation*".

Finally, we inform you that if you believe that your rights have been violated by the Controller and / or a third party, you have the right to lodge a complaint to the Authority for the Protection of Personal Data and / or other competent supervisory authority under the Regulation.