

## PRIVACY POLICY – 2024 CONGRESS REGISTRATION

Information notice pursuant to Art. 13 of the Reg. UE 2016/679 (General Data Protection Regulation | GDPR)



### 1. WHO IS THE DATA CONTROLLER? HOW TO CONTACT THEM?

The data controller, pursuant to articles 4 and 24 of EU Regulation 2016/679, is the **Association Data Protection Officer (ASSO DPO)**, with registered office at Viale Monza, 44- 20127 Milan, VAT number 08258580961, Tax Code 97656960156, represented by the President and legal representative pro-tempore Dr. Matteo Colombo.

To contact the data controller: email [info@assodpo.it](mailto:info@assodpo.it) or toll-free number 800561720.



### 2. PURPOSE OF PROCESSING, LEGAL BASIS, DATA RETENTION PERIOD AND NATURE OF PROVIDING

Purpose A)

**Registration for the ASSO DPO Congress, which will be delivered both in-person and via webinar/live streaming; production and management of the live streaming and administrative-accounting activities related to the event; use of the email contact provided by the data subjects during registration to transmit information about the event and communications related to the service; use of the phone contact exclusively in case of need for support (e.g., if the data subject has chosen participation via webinar/live streaming, in case of problems they can request and receive telephone support).**

The processing carried out for administrative-accounting purposes are related to the performance of organizational, administrative, financial, and accounting activities, regardless of the nature of the data processed. In the context of the event, no additional or unnecessary information will be collected beyond the purposes pursued.

Mandatory data collected during registration are marked with an asterisk (\*).

- **LEGAL BASIS:** fulfilment of contractual and pre-contractual obligations related to event registration (Art. 6, para. 1, lett. b) GDPR). For data subjects already associated, legal obligations of the Association are also mentioned (Art. 6, para. 1, lett. c) GDPR and LAW January 14, 2013, no. 4, art. 2, para. 3 "Professional associations promote, also through *specific initiatives*, the continuous training of their members [...]").
- **DATA RETENTION PERIOD:** 10 years or otherwise stated by law.
- **NATURE OF PROVIDING:** the provision of data marked with an asterisk (\*) is necessary, as it is essential to fulfill contractual and legal obligations. In case of failure to provide such data, data subjects will not be able to register and therefore participate in the event.

Purpose B)

**In the context of in-person participation at the event, there will be video recordings, registration, and subsequent dissemination of personal data, including images (photos/videos/audio), for promotional and informational activities aimed at advertising the Association's activities and services.** The dissemination will occur through the publication of event images, via various communication tools and channels of the Association, such as magazines, brochures, presentations, websites, and social networks.

*Regarding the processing of personal data carried out by the managers of the Social Media platforms used by the data controller, reference is also made to the information provided by them through their respective privacy policies.*

- **LEGAL BASIS:** the processing is necessary for the pursuit of the legitimate interests of the data controller or third parties, provided that the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data do not prevail. The legitimate interest of the data controller is to pursue the institutional purposes of information pursued by the Association (Art. 6, para. 1, lett. f) GDPR and considering Article 47). As provided for in Opinion 6/2014 of the Article 29 Working Party - WP29 - on the concept of legitimate interest, the Controller has conducted a 'LIA' (Legitimate Interests Assessment), balancing the interests of the parties and the rights at stake. The data subject may oppose the legitimate interest of the data controller by making a request in person to the secretarial staff, who will provide the appropriate form for exercising the right under Article 21 of the GDPR and the badge/sticker that facilitates the management of the right.
- **DATA RETENTION PERIOD:** until opposition by the data subject. The possible use of paper promotional material will occur until depletion of the stock of the produced material or until explicit request for deletion by the data subject, if earlier. In the subsequent production of promotional material, the personal data and image of the data subject will no longer be reproduced.
- **NATURE OF PROVIDING:** The provision of personal data by the data subject is optional. Any refusal to provide data results in the impossibility, for the controller, to use the data subject's image for promotional and informational activities. If the data subject intends to oppose the processing, they are kindly requested to immediately inform the Association by contacting the secretarial staff.

#### Purpose C)

**In order to allow participants to network, engage in discussions, and establish professional relationships useful for achieving common goals (such as professional growth), the Association, with the explicit consent of the data subjects, will publish their first name and last name in the list of participants included in the ASSO DPO Congress brochure.**

- **LEGAL BASIS:** the processing is based on the consent of the participants. Art. 6, para. 1, lett. a) of the GDPR.
- **DATA RETENTION PERIOD:** the data will be retained for 2 years from the end of the event.
- **NATURE OF PROVIDING:** the provision of personal data by the data subject is optional. Any refusal to provide data results in the impossibility, for the controller, to enter and publish the data subject's first name and last name in the list of participants.

#### Purpose D)

**The transfer of data to third parties (partners and sponsors of the Controller) for marketing purposes, namely to receive promotional material and commercial/informational communications from third-party entities, which operate, for example, in the following commodity-related sectors: insurance companies offering professional liability policies for Data Protection Officers, certification bodies, consulting and training companies, universities, software houses, and, in general, third parties affiliated with ASSO DPO. The list of these third parties and active agreements is available at the following link: <https://www.assodpo.it/convenzioni/>.**

- **LEGAL BASIS:** the processing is based on the consent of the participants. Art. 6, para. 1, lett. a) of the GDPR.
- **DATA RETENTION PERIOD:** until opposition by the data subject (opt-out/revocation of consent).

- **NATURE OF PROVIDING:** the provision of personal data by the data subject is optional. Any refusal to provide data results in the impossibility, for the controller, to transfer the data subject's data to the aforementioned third parties.

Purpose E)

**Management of requests from data subjects, in accordance with Articles 15 and following of the GDPR (data subject rights).**

- **LEGAL BASIS:** the processing is necessary to comply with a legal obligation to which the data controller is subject (C45). Art. 6, para. 1, letter c) of the GDPR.
- **DATA RETENTION PERIOD:** 5 years from the closure of the request, except in case of litigation.
- **NATURE OF PROVIDING:** the provision of personal data is mandatory, as it is necessary to fulfill legal obligations.



### **3. TO WHOM WILL THE PERSONAL DATA BE DISCLOSED? DATA RECIPIENTS**

The personal data will be disclosed to entities that will process the data as independent data controllers, or data processors (Art. 28 of the GDPR) and processed by individuals (Art. 29 of the GDPR) acting under the authority of the Controller and Processors based on specific instructions provided regarding the purposes and methods of the processing.

The data will be disclosed to recipients belonging to the following categories:

- companies, based in Italy, contractually linked to the Association Data Protection Officer;
- freelancers, studios, or companies in the context of assistance and consultancy relationships, based in Italy;
- entities, based in Italy, providing services for the management of the information system used by the Association Data Protection Officer and telecommunications networks;
- entities, based in Italy, providing services for the website and communication networks, including email, hosting, and newsletter management;
- companies, located in Italy, that act as providers of platforms used for the delivery of events via webinar/live streaming;
- entities, based in Italy, providing services for the management of activities related to purpose b) - image dissemination - such as photo and video production, communication, brochure printing, flyer creation, publishing of photos and videos on websites and social media channels of the Association, etc;
- social media platform providers and related service providers (e.g., for uploading videos produced during events), also located in non-EEA countries (see paragraph 4 below);
- only with prior consent for purpose c), other associates, by publishing the list of participants;
- only with prior consent, commercial partners/sponsors, based in Italy, for purpose d) - transfer of data to third parties;
- competent Authorities for compliance with legal obligations and/or provisions of public bodies.

The list of Data Processors is constantly updated and available by writing to [info@assodpo.it](mailto:info@assodpo.it) or at the legal headquarters of the Data Controller.



#### 4. DOES ASSO DPO TRANSFER THE DATA TO COUNTRIES OUTSIDE THE EEA?

Personal data may also be transferred to countries located outside the European Economic Area (EEA), if the data subjects consent to the dissemination for promotional and informational activities conducted by the Association, also through the use of social media platforms. Such transfer will then be managed as established in the terms and conditions and privacy policies of those platforms. In particular, reference is made to the following policies:

- YouTube, located in the United States - <https://www.youtube.com/howyoutubeworks/our-commitments/protecting-user-data/>;
- X, located in the United States - <https://twitter.com/en/privacy>;
- LinkedIn, located in the United States - <https://www.linkedin.com/legal/privacy-policy>;
- Facebook / Meta, located in the United States - <https://www.facebook.com/privacy/policy/>.

In cases where it is necessary to transfer the personal data of data subjects to countries located outside the EEA, this will be done in compliance with the limits and conditions set out in Articles 44 and following of EU Regulation 2016/679.

In particular:

- Art. 45 of the GDPR - to third countries / international organizations for which the Commission has issued an adequacy decision:
  - United States. For further information, please refer to the Data Privacy Framework website: <https://www.dataprivacyframework.gov/>.

The data subject can obtain information about the guarantees for data transfer by writing an email to [info@assodpo.it](mailto:info@assodpo.it) or at the legal headquarters of the Data Controller.



#### 5. IS THERE AN AUTOMATED PROCESS?

Personal data will undergo traditional manual, electronic, and automated processing. It is clarified that fully automated decision-making processes are not carried out.

#### 6. WHAT ARE THE DATA SUBJECTS RIGHTS? HOW TO EXERCISE THEM?

The data subjects may exercise their rights as expressed in Articles 15 and following of the GDPR by contacting the Data Controller at the email address: [info@assodpo.it](mailto:info@assodpo.it) or by writing to the above-mentioned contacts.

The data controller ensures data subjects the ability to request, at any time, access to their personal data (Art. 15), rectification (Art. 16), erasure (Art. 17), and restriction of processing (Art. 18). The data controller communicates (Art. 19) to each recipient to whom the personal data have been disclosed any rectification or erasure or restriction of processing carried out. The data controller informs the data subjects upon request of such recipients.

The data controller ensures the right to data portability (Art. 20) and, in the event of requests under Article 20, will provide data subjects with the data in a structured, commonly used, and machine-readable format.

Data subjects are recognized the right to object (Art. 21), at any time, to the processing of data based on legitimate interest, by writing to the contacts provided above with the subject "objection". In the event of exercising the right to object to processing based on legitimate interest, the data controller acknowledges data subjects the possibility to obtain, upon request, information about the balancing test conducted.

In cases provided for, data subjects have the right to withdraw consent without affecting the lawfulness of processing based on consent before its withdrawal.

If data subjects believe that the processing of personal data carried out by the Data Controller violates the provisions of Regulation (EU) 2016/679, they are free to lodge a complaint with the national supervisory Authority. In particular, in the Member State where they habitually reside or work, or where the alleged violation of the Regulation occurred (Italian Data Protection Authority <https://www.garanteprivacy.it/>) or to resort to the appropriate judicial remedies.



#### **7. AMENDMENTS TO THE PRIVACY POLICY**

The data controller may change, modify, add, or remove any part of this Privacy Policy. In order to facilitate the verification of any changes, the policy will include the indication of the update date.

*Update date: 12/04/2024*