

***PRIVACY NOTICE – PROCESSING OF PERSONAL DATA BY FIERA MILANO S.P.A.***

***Articles 13 and 14 of Regulation (EU) 2016/679 – General Data Protection Regulation (GDPR)***

In compliance with Articles 13 and 14 of Regulation (EU) 2016/679 (“GDPR”), Fiera Milano S.p.A. (hereinafter, “Fiera Milano”), acting as Data Controller (hereinafter, the “Controller”), intends to provide information regarding the processing of personal data that may concern exhibitors, where these are sole proprietorships, small entrepreneurs, professionals, etc., or the representatives of exhibitors where these are companies, entities or associations (to which, as is known, the GDPR does not apply) (the “Exhibitors” or individually the “Exhibitor”).

Such personal data are provided in the application for participation/admission or subsequently, as well as collected from third parties (e.g. event organizer(s), partners, business information companies, etc.) or during the Event, in connection with the performance of the activities referred to in Section 3 of this privacy notice.

**1. Contact details of the Controller and the Data Protection Officer**

The Data Controller is Fiera Milano S.p.A., with registered office at Piazzale Carlo Magno no. 1 – 20149, Milan (MI), administrative and operational offices at Largo Fiera Milano no. 5 – 20017, Rho (MI), e-mail: [privacy@fieramilano.it](mailto:privacy@fieramilano.it)

The Controller has appointed a Data Protection Officer (DPO), who may be contacted at the Controller’s addresses indicated above or at the following e-mail address: [dpo@fieramilano.it](mailto:dpo@fieramilano.it)

**2. Categories of personal data processed and source of personal data**

The Controller processes the following categories of personal data of the data subject (hereinafter also referred to as “Personal Data”), by way of example and not limited to: identification data (first and last name, tax code, VAT number, etc.), contact details (e.g. e-mail address, mobile phone number, etc.), economic and payment data, reference company, job title, corporate role, and images (photos/videos).

Where Personal Data are not collected directly from the data subject, the Controller acquires them from the economic operator with whom the data subject works, as well as from third parties (e.g. event organizer(s), partners, business information companies, etc.).

**3. Purposes and legal basis of the processing**

Personal Data are collected and processed for the following purposes:

- a) to carry out measures, legal obligations (i.e. administrative and accounting formalities), to provide insurance coverage and services related to venue services (managed by Fiera Milano, hereinafter the “Exhibition Centre”) necessary for the Exhibitor’s participation in the Event, as well as to perform independent activities aimed at maintaining and ensuring the safety of the Exhibition Centre, on the basis of the obligations incumbent on Fiera Milano as the manager of the Exhibition Centre;  
Furthermore, Personal Data may be processed in order to carry out measures, obligations and services directly requested by the Exhibitors from Fiera Milano. In such cases, reference is made to the specific privacy notices made available by Fiera Milano for each service requested by the Exhibitor;
- b) to carry out administrative, organisational, technical and security activities necessary for and connected with the provision of the services referred to in point a);
- c) to carry out statistical processing activities relating to the services referred to in point a);

- d) to establish, exercise or defend the Controller's rights in judicial proceedings;
- e) to document and promote the characteristics of the Exhibition Centre, the Controller may take photos and/or videos. Where possible, photographic and/or video recordings will be carried out without processing the data subject's Personal Data (i.e. without the data subject being identified and/or identifiable).

For the purpose referred to in point a), the Controller processes Personal Data in order to perform the contract to which the data subject is a party, in the case of sole proprietorships, small entrepreneurs and professionals, pursuant to Article 6(1)(b) GDPR, and/or to comply with legal obligations pursuant to Article 6(1)(c) GDPR.

For the purpose referred to in point b), the Controller processes Personal Data in order to perform the contract to which the data subject is a party, pursuant to Article 6(1)(b) GDPR.

For the purpose referred to in point c), the Controller processes Personal Data on the basis of its legitimate interest pursuant to Article 6(1)(f) GDPR, namely the legitimate interest of the Controller in carrying out aggregated analyses relating to the provision of the services referred to in point a).

For the purpose referred to in point d), the Controller processes Personal Data on the basis of its legitimate interest pursuant to Article 6(1)(f) GDPR, namely to defend its rights in judicial or out-of-court proceedings in the event of disputes or claims.

For the purpose referred to in point e), where processing cannot be avoided, the legal basis shall be the legitimate interest of the Controller pursuant to Article 6(1)(f) GDPR, namely the Controller's legitimate interest in documenting and promoting the characteristics of the Exhibition Centre through photos/videos.

#### **4. Methods of processing**

Personal Data are processed for the purposes described above in compliance with Article 5 GDPR, using both paper-based and electronic means.

Processing is carried out directly by the Controller through employees and collaborators who are authorised to perform Personal Data processing activities related to the contractual relationship and have been appropriately instructed.

#### **5. Nature of the provision of data and consequences of refusal**

For the purposes referred to in points a), b) and d) of Section 3, Personal Data are necessary for the performance of contractual and legal obligations. Failure to provide such Personal Data will make it impossible to establish and perform the contractual relationship and/or to access the Exhibition Centre.

For the purposes referred to in points c) and e) of Section 3, the Exhibitor is free not to provide Personal Data, and failure to provide them, even partially, shall not be prejudicial to the Exhibitor.

#### **6. Data retention period**

Personal Data processed for the purposes referred to in points a) and b) of Section 3 will be processed until the termination of the services and, thereafter, for the periods required by applicable laws.

Personal Data processed for the purpose referred to in point c) of Section 3 will be processed for six (6) months following the end of the Event.

Personal Data processed for the purpose referred to in point d) of Section 3 will be processed in accordance with the statutory limitation periods applicable to the enforceable rights.

Personal Data processed, where applicable, for the purpose referred to in point e) of Section 3 will be retained for five (5) years following the end of the Event.

Subject to the time required for technical deletion and backup operations, Personal Data will be deleted upon expiry of the above retention periods.

## **7. Recipients of Personal Data**

For the purposes referred to in Section 3, Personal Data may be disclosed by Fiera Milano to other companies of the Fiera Milano Group (see also the updated list available on the website <https://www.fieramilano.it/azienda.html>

), as well as to trusted companies providing administrative, organisational, technical and security services, such as consultancy firms (companies providing administrative, accounting and legal services), debt collection companies, hosting providers, etc.

Companies processing Personal Data on behalf of Fiera Milano act as data processors pursuant to Article 28 GDPR.

Personal Data may also be disclosed to parties who process them as independent data controllers, on the basis of a legal obligation or an agreement in force between the parties.

Personal Data may be transferred to third countries outside the EEA only in compliance with adequacy decisions of the European Commission, or on the basis of appropriate safeguards (such as standard contractual clauses or binding corporate rules), or, failing these conditions, where the transfer is authorised by the data subject or is necessary for the performance of the contract with or in favour of the data subject.

## **8. Disclosure**

Personal Data will not be disclosed, with the exception of any image of the data subject that may be disclosed through the Controller's promotional materials, website and social media channels (i.e. Facebook, YouTube, Instagram, X and LinkedIn).

In such cases, social networks and their users may transfer the image to countries outside the EEA, each acting as an independent data controller pursuant to Article 4(7) GDPR.

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

The GDPR grants the data subject the right to access their Personal Data at any time and obtain a copy thereof, to rectify and supplement inaccurate or incomplete data, to erase or restrict processing where the relevant conditions are met, to object to processing on grounds relating to their particular situation, and to request data portability of Personal Data provided, where processed by automated means on the basis of consent or for the performance of a contract.

The data subject also has the right to withdraw consent, where required, without affecting the lawfulness of processing based on consent prior to its withdrawal.

The Controller to whom the data subject may address requests to exercise the above rights is Fiera Milano S.p.A., with registered office at Piazzale Carlo Magno no. 1 – 20149, Milan (MI), administrative and operational offices at Largo Fiera Milano no. 5 – 20017, Rho (MI), e-mail: [privacy@fieramilano.it](mailto:privacy@fieramilano.it)

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