

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA OF PARTICIPANTS IN ONLINE COURSES AND WEBINARS

This Privacy Policy is distributed to participants in the webinars organised by Assocalzaturifici Italiani with the technical support of A.N.C.I. Servizi s.r.l. a socio unico and in some cases with the collaboration of Confindustria Moda and its associations, with a view to providing them with information, as reported below, concerning the processing of personal data under article 13 of EU Regulation 2016/679 (GDPR).

Joint Data Controllers: The Joint Data Controllers pursuant to art. 26 of the GDPR are: Assocalzaturifici Italiani and A.N.C.I. Servizi s.r.l., both with offices in Milan, Via Alberto Riva Villasanta, 3. Both Joint Data Controllers may be contacted by phone at +39 02 438291, by fax at +39 02 48005833, and by e-mail at info@assocalzaturifici.it.

Contact person and DPO: The Joint Data Controllers have appointed their DPO, Atty. Laura Marretta, who may be contacted at the e-mail address privacy@assocalzaturifici.it, and who also serves as contact person.

Processing purposes: Data received from Webinar participants will be processed for the following purposes: management of every activity related to the organisation and delivery of the online course/webinar in order to allow data subjects to participate (registration and enrolment, preparation of the list of members, verification of participants, etc.).

Provision of data and legal basis of processing: The provision of data is necessary in order to register and participate in the Webinar. The legal basis of processing, therefore, is contractual.

Types of personal data processed: The data collected through the online form specially designed to register for the Webinar is merely personal and not sensitive.

Processing methods: Any data supplied will be processed by authorised parties and by processors appointed by contract under art. 28 of the GDPR. The processing of data is carried out on paper, electronically or online by specifically authorised parties. The Data Controller implements appropriate security measures as laid down in Art 32 of the GDPR to prevent any loss of data, unlawful or improper use and unauthorised access to data. The Data Controller does not make use in any way of automated decision-making processes regarding your personal data, neither does it profile your data.

Transferring personal data outside the EU: Your data will be processed in the EU and, where necessary, in non-EU countries in accordance with and subject to the limitations laid down in Chapter 5 of the GDPR.

Disclosure and dissemination of data: Without prejudice to any communications made to comply with legal obligations, the Joint Data Controllers will only communicate

the personal data of participants to their own Processors (appointed by contract under art. 28 of the GDPR) tasked with activities related to the management and organisation of the online course/webinar (E.g. the company ClickMeeting - <https://clickmeeting.com/> - which manages the platform on which the Webinars are held) and/or to external companies tasked with managing the IT system, to the associations of individual participant if involved in the event, and to certain speakers (unless you object by e-mail to the DPO). In particular, A.N.C.I. has entered into an agreement with those speakers who will receive some of the data of the participants enrolled in the Webinar (name and surname, e-mail, company name), through which said speakers undertake to use the data received in their capacity as Data Controllers, pursuant to and in accordance with the provisions of EU Regulation 2016/679 and Italian Leg. Decree 196/03, for a month only, exclusively for the purpose of filing, sending course slides and making first contact, through the following activities: management, organisation, storage, use, communication to company members and/or managers appointed by contract, exercising of the rights of the data subjects, destruction and amendment the data processed at the data subject's request, consultation, communication of initiatives related to the activity conducted. It is the responsibility of said speakers to provide you with a specific Privacy Policy in their capacity as Data Controllers.

The participants' personal data will NOT be disseminated.

Data retention time: Personal data will be retained for the time necessary to perform processing in accordance with the aforementioned purposes.

Data Breach: If the Data Controller should suffer a violation of the type described in articles 33 and 34 involving a risk to the rights and freedoms of individuals (a data breach), the Data Controller will, if necessary, notify the Data Protection Authority and inform all data subjects of the breach.

Rights of data subjects: The Data Controller informs you that you have the rights of access listed under art. 15 of the EU Reg. and are also entitled to:

1. ask the Data Controller to permit you to access your personal data and/or correct or delete the data, or request limitation of data processing;
2. object to data processing;
3. data portability;
4. revoke your consent at any time without affecting the lawfulness of data processing on the basis of consent given prior to revocation, if processing is based on article 6(1)(a) or art. 9(2)(a) of the GDPR.

To exercise the rights listed above or for further information on the processing of your personal data or for communications on privacy issues, simply send an email to privacy@associazaturifici.it, specifying "exercise of rights" in the subject line and specifying in your message the right you wish to exercise. We will provide an answer within the term indicated in Art 12 of the GDPR.

Data subjects are also entitled to lodge a **Complaint** with the Italian Data Protection Authority (www.garanteprivacy.it) or to the Data Protection Authority of the EU State in which the data subjects habitually reside or work or of the place where an alleged breach occurred, if they think their data has been processed in an unlawful manner (to

this end, please check the website of the competent Authority; for Italy: <https://www.garanteprivacy.it/>).

The Data Controller also notifies you that if they should intend to further process your personal data for a purpose other than that for which the data was collected, the data subject will be provided in advance with information on this different purpose and all other pertinent information, as stated in paragraph 2, requesting your specific consent where required.