

Subject: information relating to the processing of your personal details pursuant to art. 13 EU Reg 2016/679

Pursuant to the effects of Italian Legislative Decree n.196 dated 30th June 2003, Personal Data Protection Code, (hereinafter the "Code") and EU Regulation 2016/679 on Data Protection, we hereby inform you that your personal details will be processed by the Data Processing Controller as specified below.

For the sake of clarity, please take note of the meaning of the terms below:

Processing: any operation or series of operations, handled with or without the use of automated processes and applied to personal details or series of personal details, such as the gathering, recording, organisation, structuring, storing, adaptation or modification, extraction, consulting, use, communication by means of transmission, publication or any other form of provision, comparison or interconnection, limitation, deletion or destruction.

Personal details: any information concerning an identified or identifiable physical person («the interested party»); a physical person is considered identifiable if they can be identified, directly or indirectly, with particular reference to an identifier such as a name, identification number, details relating to the location, an on-line identity, or one or more elements that are characteristic of their physical, physiological, genetic, psychological, economic, cultural or social identity.

1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER (hereinafter also referred to as the "Controller" for the sake of brevity) and of the **DATA PROTECTION OFFICER – DPO****DATA CONTROLLER**

Company Name: CANOSSA EVENTS SRL

Address: Via Filippo Turati 28 - Loc. Roncolo 42020 Quattro Castella (RE) - Italy

VAT Number and Fiscal Code: IT02431580352

TEL. + 39 (0)522 421096

E-mail: info@canossa.com

JOINT DATA CONTROLLER

Company Name: CANOSSA LIFESTYLE SRL

Address: Via Filippo Turati 28 - Loc. Roncolo 42020 Quattro Castella (RE) - Italy

VAT Number and Fiscal Code: IT02916740356

TEL. + 39 (0)522 421096

E-mail: info@canossa.com

DPO

Company Name: Als Project s.r.l.

E-mail: dpo@ambientelavorosalute.com

Telephone: +39 (0)522 326285

Canossa Group (Canossa Events s.r.l. and Canossa Lifestyle s.r.l.) as Joint Data Controllers, whereby said joint controllership is based on them having shared data and having the same purposes for its processing, in compliance with the provisions of Article 13 of EU Regulation 679/2016, hereby inform you that your personal details may be used by either Joint Data Controller in accordance with the provisions of the Regulation and in relation to their respective main purposes, in the manner indicated below regarding the recipient of this privacy notice.

INTERESTED PARTIES AFFECTED BY THE PROCESSING OF PERSONAL DETAILS: private customers

Date __/__/_____

| Signature _____

2. OBJECT, PURPOSE AND LEGAL BASIS FOR DATA PROCESSING

- a. **Purpose and Object:** Commercial or contractual. In order to deliver the required service, to prepare an offer, to implement the terms of a contract signed between the parties.

How personal details are collected: on paper, by word of mouth, e-mail, telephone, or on-line

Type of data and legal basis for processing (lawfulness)

- Name and surname, phone numbers, company name, licenses, fiscal identity code, and other identity numbers, bank account details, credit card number, vehicle details, and the e-mail of the interested person affected by data processing. Said data processing falls within the legal basis pursuant to Article 6(1)(B).

Categories that may be privy to your personal details – Recipients -:

Your Personal Details may be made accessible for the above-mentioned purposes, or in order to comply with legal obligations or for the performance of activities instrumental to the above-mentioned purposes, to:

- the employees of the Data Controller, who have been specifically appointed and authorised, also as Data Protection Officers, for specific data processing operations;
- third party companies or other third parties providing outsourced operations on behalf of the Controller, in their capacity as external Data Processing Officers, who have been specifically appointed and authorised for specific data processing operations.

Agreements signed with the latter will only allow essential processing and will guarantee the confidentiality, security and integrity of data.

Categories of External Data Processing Officers that may be appointed:

- Individuals providing technical, organisational, professional or operational services on behalf of the Data Controller in order to achieve the stated purposes.
- Individuals providing information technology and legal services on behalf of the Data Controller as required to safeguard the perfection of the stated purposes.
- Companies/ institutions / agencies employed in the logistics and organisation of the event;

Your personal details may be transferred to Independent Data Controllers, such as Public Agencies for Supervision or Control

Refusal: refusing to provide your personal details or to authorise their processing, which is your acknowledged right as the interested person affected by data processing, will make it impossible for us to pursue any form of relationship.

You may inform us of your refusal using the contact details in point 1

Under no circumstances will your personal details be made public or used for any other purpose.

- b. **Purpose and Object:** the e-mail address you provide will be used for **soft marketing** purposes, such as the advertising of services similar to those in which you expressed your interest by choosing to make use of one of our specific products/services, for the exclusive intents and purpose of the pursuing the mutual and legitimate interest of both parties. Said activity will be based on the sending of e-mails with a low contact frequency.

How your personal details are collected: on paper, by word of mouth, e-mail, by telephone, on-line

Type of data: e-mail address

Legal basis for data processing (lawfulness): Said data processing falls within the scope of lawful processing pursuant to Article 130, paragraph 4, of Legislative Decree N. 196 dated June 30th 2003, known as the "Data Protection Code", in addition to the amendments introduced by Legislative Decree N. 101 dated August 10th 2018

Categories that may be privy to your personal details – Recipients -:

Your Personal Details may be made accessible for the above-mentioned purposes, or in order to comply with legal obligations or for the performance of activities instrumental to the above-mentioned purposes, to:

- the employees of the Data Controller, who have been specifically appointed and authorised, also as Data Protection Officers, for specific data processing operations;
- third party companies or other third parties providing outsourced operations on behalf of the Controller, in their capacity as external Data Processing Officers, who have been specifically appointed and authorised for specific data processing operations.

Agreements signed with the latter will only allow essential processing and will guarantee the confidentiality, security and integrity of data.

Categories of External Data Processing Officers that may be appointed:

- Individuals providing technical, organisational, professional or operational services on behalf of the Data Controller in order to achieve the stated purposes.
- Individuals providing information technology and legal services on behalf of the Data Controller as required to safeguard the perfection of the stated purposes.
- Persons who perform commercial and marketing services on behalf of the Controller in compliance with the limits and constraints set out in the preceding paragraphs.

Your personal details may be transferred to Independent Data Controllers, such as Public Agencies for Supervision or Control

Refusal: As the interested party, you may object to said data processing at any time by notifying your refusal to the e-mail address of the data controller, as provided in paragraph 1 or following the instructions provided in each e-mail (OPT-out). The right to withdraw your consent at any time will not affect the lawfulness of data processing prior to withdrawal.

You may inform us of your refusal using the contact details in point 1

Under no circumstances will your personal details be made public or used for any other purpose.

- c. **Purpose and Object:** processing of personal details (name of persons taking part in the events / any comments and interviews) by means of publication in the press (web, social media, printed publications) for the purpose of advertising and promoting the event on commonly used media

How your personal details are collected: on paper, by word of mouth, e-mail, by telephone, on-line

Type of data: personal details (name of persons taking part in events/any comments and interviews). This data processing falls under legally-allowed processing pursuant to art. 6 paragraph 1 letter A of EU Regulation 2016/679 relating to Data Protection. As the interested party, you must GIVE YOUR CONSENT to the processing of your personal details for this specific purpose.

Categories that may be privy to your personal details – Recipients -:

Your Personal Details may be made accessible for the above-mentioned purposes, or in order to comply with legal obligations or for the performance of activities instrumental to the above-mentioned purposes, to:

- the employees of the Data Controller, who have been specifically appointed and authorised, also as Data Protection Officers, for specific data processing operations;
- third party companies or other third parties providing outsourced operations on behalf of the Controller, in their capacity as external Data Processing Officers, who have been specifically appointed and authorised for specific data processing operations.

Agreements signed with the latter will only allow essential processing and will guarantee the confidentiality, security and integrity of data.

Categories of External Data Processing Officers that may be appointed:

- Individuals providing technical, organisational, professional or operational services on behalf of the Data Controller in order to achieve the stated purposes.
- Individuals providing information technology and legal services on behalf of the Data Controller as required to safeguard the perfection of the stated purposes.

Refusal: Refusing to provide your personal details or to authorise their processing, which is your acknowledged right as the interested party, will make it impossible for you to take part/register to take part in the event.

You may notify us of your refusal using the contact details in point 1.

Under no circumstances will your personal details be made public or used for any other purpose.

- d. **Purpose and Object:** publication in the press (web, social media, printed publications) of images / video footage of the interested party. Said publication may take place without blurring out your face or any other features, thus making your identification possible. The purpose of the above is for the promotion / marketing / to provide information - to document the image

How your personal details are collected: Photographs / audio visual footage

Type of data and legal basis for processing (lawfulness): Image/voice data. The broadcasting of video footage and photographs, either on traditional media (TV, press) or social media and the internet, is fundamental for events of this nature. Therefore, this type of data processing is legitimate and your refusal will make it impossible for you to take part in the event. CANOSSA EVENTS S.R.L. will take steps to remind you of this type of data processing prior to the start of each event.

Categories that may be privy to your personal details – Recipients -:

Your Personal Details may be made accessible for the above-mentioned purposes, or in order to comply with legal obligations or for the performance of activities instrumental to the above-mentioned purposes, to:

- the employees of the Data Controller, who have been specifically appointed and authorised, also as Data Protection Officers, for specific data processing operations;
- third party companies or other third parties providing outsourced operations on behalf of the Controller, in their capacity as external Data Processing Officers, who have been specifically appointed and authorised for specific data processing operations.

Agreements signed with the latter will only allow essential processing and will guarantee the confidentiality, security and integrity of data.

Categories of External Data Processing Officers that may be appointed:

- Individuals providing technical, organisational, professional or operational services on behalf of the Data Controller in order to achieve the stated purposes.
- Individuals providing information technology and legal services on behalf of the Data Controller as required to safeguard the perfection of the stated purposes.

Refusal: Refusing to provide your personal details or to authorise their processing, which is your acknowledged right as the interested party, will make it impossible for you to take part/register to take part in the event.

You may notify us of your refusal using the contact details in point 1.

Under no circumstances will your personal details be made public or used for any other purpose.

e. **Purpose and Object: Processing of data relating to your health, such as food allergies/intolerances/specific health conditions**, medical data relating to fitness to take part in **sport**, religious data associated with **food choices**, your **body measurements** for the purpose of making bespoke items of clothing. The purpose of said data processing is associated with the preparation and safe delivery of the services as agreed in the contract signed by the parties in relation to the event.

How personal details are collected: on paper, by word of mouth, e-mail, telephone, or on-line

Type of data and legal basis for processing (lawfulness)

- Health-related data with regard to allergies/food intolerances/specific health conditions/medical certificate for sports fitness/body measurements. Biometric data. This data processing falls under legally-allowed processing pursuant to art. 9 paragraph 2 letter A of EU Regulation 2016/679 relating to Data Protection. As the interested party, you must GIVE YOUR CONSENT to the processing of your personal details for this specific purpose.

Categories that may be privy to your personal details – Recipients -:

Your Personal Details may be made accessible for the above-mentioned purposes, or in order to comply with legal obligations or for the performance of activities instrumental to the above-mentioned purposes, to:

- the employees of the Data Controller, who have been specifically appointed and authorised, also as Data Protection Officers, for specific data processing operations;
- third party companies or other third parties providing outsourced operations on behalf of the Controller, in their capacity as external Data Processing Officers, who have been specifically appointed and authorised for specific data processing operations.

Agreements signed with the latter will only allow essential processing and will guarantee the confidentiality, security and integrity of data.

Categories of External Data Processing Officers that may be appointed:

- Individuals providing technical, organisational, professional or operational services on behalf of the Data Controller in order to achieve the stated purposes.
- Individuals providing information technology and legal services on behalf of the Data Controller as required to safeguard the perfection of the stated purposes.

Your personal details may be transferred to Independent Data Controllers, such as Public Agencies for Supervision or Control

Refusal: refusing to provide your personal details or to authorise their processing, which is your acknowledged right as the interested person affected by data processing, will make it impossible for us to pursue any form of relationship.

You may inform us of your refusal using the contact details in point 1

Under no circumstances will your personal details be made public or used for any other purpose.

- f. **Purpose and Object:** GPS geo-tracking for security purposes and to safeguard the smooth running of the event in which you are participating. Geo-tracking by the operations centre in order to provide roadside assistance or to alert rescue services, if necessary.

How your personal details are collected: By means of a smartphone fitted with a GPS and a SIM card that was purposefully given to the crew before their departure.

Type of data and legal basis for processing (lawfulness):

- GPS coordinates. Name. Phone numbers and the duration of incoming and outgoing calls. Rankings in the race. This data processing falls under legally-allowed processing pursuant to art. 6 paragraph 1 letter A of EU Regulation 2016/679 relating to Data Protection. As the interested party, you must GIVE YOUR CONSENT to the processing of your personal details for this specific purpose. By voluntarily collecting the GPS smartphone supplied by the organisation at departure and signing the consent form, you have unequivocally expressed your consent. Conversely, your refusal to collect the smartphone is unequivocally taken to mean you refuse to authorise this form of data processing, which is completely voluntary and non-compulsory.

Categories that may be privy to your personal details – Recipients -:

Your Personal Details may be made accessible for the above-mentioned purposes, or in order to comply with legal obligations or for the performance of activities instrumental to the above-mentioned purposes, to:

- the employees of the Data Controller, who have been specifically appointed and authorised, also as Data Protection Officers, for specific data processing operations;

- An external company, acting as an external data processing officer, providing necessary technological support to safeguard the execution of the service.
- An external company, acting as an external data processing officer, offering real-time remote assistance to participants

Data may only be shared with authorised third-party companies involved in undertaking investigations and to public authorities in the event of illicit acts or upon suspicion of illicit acts associated with the use of the smartphone.

Duration of Data Processing: Your personal details will be stored for the duration of the event. GPS data will be deleted at the end of the event; other details will be kept for documentary purposes should either party need to defend their rights. In particular, data relating to phone use must be stored for at least five years in case of police or judicial investigations.

As the customer, you may interrupt data processing and consequently its duration at any time by switching off the smartphone received or returning it. Should you decide to interrupt the processing of your personal details by switching off the smartphone, please notify the organisers first in order to avoid false alarms.

Refusal: You may refuse the processing of your details at any time. Simply do not collect the smartphone provided for you by the organisers or switch it off - in this case, please notify the organisers first in order to avoid false alarms - or return it. The consequences of your refusal mean it will be impossible to assist you promptly should you become lost, be involved in a traffic accident, or encounter other difficulties on the road.

- g. **Purpose and Object:** Security. To record video footage on the registered premises of Canossa Events srl pursuant to current legislation and the guidelines on video surveillance for security purposes.

How personal details are collected: video footage

Type of data and legal basis for processing (lawfulness):

- Audio and video footage. This form of data processing falls under legally allowed processing pursuant to art. 6 paragraph 1 letter F of EU Regulation 2016/679 about Data Protection.

Categories that may be privy to your personal details – Recipients -:

Your Personal Details may be made accessible for the above-mentioned purposes, or in order to comply with legal obligations or for the performance of activities instrumental to the above-mentioned purposes, to:

- the employees of the Data Controller, who have been specifically appointed and authorised, also as Data Protection Officers, for specific data processing operations;
- third party companies or other third parties providing outsourced operations on behalf of the Controller, in their capacity as external Data Processing Officers, who have been specifically appointed and authorised for specific data processing operations.

Agreements signed with the latter will only allow essential processing and will guarantee the confidentiality, security and integrity of data.

Categories of External Data Processing Officers that may be appointed:

- Persons who perform services of a technical nature on behalf of the Controller required to safeguard the achievement of the stated purposes.
- Individuals providing information technology and legal services on behalf of the Data Controller as required to safeguard the perfection of the stated purposes.

Your personal details may be transferred to Independent Data Controllers, such as Public Agencies for Supervision or Control

Refusal: Refusing to provide your personal details or to authorise their processing, which is your acknowledged right as the interested person affected by data processing, will make it impossible to pursue any form of relationship, as all activities are recorded on video.

Under no circumstances will your personal details be made public or used for any other purpose.

h. **Purpose and Object: Preventing the spread of Covid-19.** Your personal details will be processed exclusively for the purpose of preventing the spread of the Covid-19 virus, as required by the current Covid-19 Safety Protocol. We will not record your body temperature reading unless this is required in order to document the reasons preventing your access to the premises (if your body temperature is above the allowed limit).

How personal details are collected: a thermometer to read body temperature and a statement issued by the interested party disclosing any close contact with persons at risk having tested positive or suspected of being positive for Covid-19 in the last 14 days

Type of data and legal basis for processing (lawfulness):

- body temperature; information relating to close contact with persons at risk having tested positive or suspected of being positive for Covid-19 in the last 14 days. Said processing is legitimate based on the implementation of the Covid-19 safety protocols pursuant to Article 1, no. 7, letter d) of Prime Ministerial Decree of March 11th 2020, as specified in the Protocol dated April 24th 2020 - Shared protocol regulating the measures to combat and contain the spread of the COVID-19 virus in the workplace.

Categories that may be privy to your personal details – Recipients -:

Your Personal Details may be made accessible for the above-mentioned purposes, or in order to comply with legal obligations or for the performance of activities instrumental to the above-mentioned purposes, to:

- the employees of the Data Controller, who have been specifically appointed and authorised, also as Data Protection Officers, for specific data processing operations;

Your personal details may be transferred to Independent Data Controllers, such as Public Agencies for Supervision or Control

Refusal: Refusing to provide your personal details or to authorise their processing, which is your acknowledged right as the interested person affected by data processing, will make it impossible to pursue any form of relationship.

Under no circumstances will your personal details be made public or used for any other purpose.

Duration of personal data processing Data is not stored.

- i. **Purpose and Object:** prevention of Covid-19 infection and to control the authenticity, validity and integrity of the Covid-19 Green Certificate or equivalent certification pursuant to Article 9-septies of Legislative Decree n. 52/2021.

Categories of data processed: name of the interested party and the validity, integrity and authenticity of the Covid-19 Green Certificate (or equivalent certification) or lack thereof.

How personal details are collected: by word of mouth, e-mail, telephone, text message, via a paper or electronic certificate.

Legal basis: Said data processing is legally allowed pursuant to art. 6 paragraph 1 letter C of EU Regulation 2016/679 relating to Data Protection.

Categories that may be privy to your personal details – Recipients:

- Personnel of the undersigned company, who were appointed in writing by the employer
- Employer
- Prefecture Officials (acting as independent Data Controllers)

All such third parties operate as specifically-appointed Third Party Data Processing Officers.

Refusal: Refusing to provide your personal details or to authorise their processing, which is your acknowledged right as the interested person affected by data processing, will make it impossible to pursue any form of relationship.

You may inform us of your refusal using the contact details in point 1

Under no circumstances will your personal details be made public or used for any other purpose.

Duration of personal data processing Data is not stored.

Transfer of data abroad Your Personal Data will be processed within Italy.

3. DURATION OF DATA PROCESSING

Unless specified otherwise above, your data will be stored for 10 years from the termination of the relationship or, in the event of changes to legislation or case law, for as long as its storage is necessary so that either party may defend their rights.

The obsolescence of the data is checked regularly.

4. DATA PROCESSING TOOLS AND LOGIC

As far as the purposes specified above, data processing makes use of manual, computerised and telematic tools based on logic that is strictly related to the above purposes and with the ultimate aim of guaranteeing the security and confidentiality of the data itself.

5. RIGHTS OF THE INTERESTED PARTY

All the rights mentioned below can be exercised by contacting the data controller at the contact details given at the beginning of the document, paragraph 1

- You have the right to request access to your personal data from the data controller
- You have the right to ask the Data Processing Controller to correct / delete / all or part of your personal details
- You have the right to object to the processing of your personal details by Data Processing Controller
- You have the right to receive the full list of Data Processing Officers
- You have the right to receive your personal details stored in an organised and legible format which is in standard use
- You have the right to lodge a complaint with a supervisory authority such as the Privacy Authority (Garante per la Privacy) at the contact details given at the following link <https://www.garanteprivacy.it/home/footer/contatti>

There are no automated decision-making processes, including profiling according to article 22, paragraphs 1 and 4 of European Privacy Regulation 2016/679

6. TRANSFER OF DATA ABROAD

Your Personal Details will be processed within the European Union and stored on servers located within the European Union and may be processed and stored in countries outside the European Union provided an appropriate level of protection is guaranteed. Said level of protection will be considered to be appropriate if the European Commission has expressed its decision with regard to the recipient country or where appropriate contractual or statutory safeguards have been provided by the Data Processing Controllers and Data Processing Officers abroad, including standard data protection clauses (Art. 46, section 2(c) and (d) of the EU Data Protection Regulation 2016/679). *As far as group companies based outside the European Union are concerned, the transfer of data abroad is based on a decision of adequacy (Art. 45 of the EU Data Protection Regulation 2016/679) by way of appropriate contractual agreements. Individual consent will be collected in a special log book.*

This being the case solely with respect to confidentiality and the purposes described herein, these guarantees may be consulted at the premises of the Data Processing Controller or may be sent by e-mail. Requests may be sent using the contact details in point 1