



## PRIVACY GDPR ORGANIZATIONAL MODEL

### “EVENT MANAGEMENT” ADVISORY EX ART. 13 GDPR

Sheet	1 of 6
Date	18/05/23
Revision	03

## ADVISORY

to anyone registering for events organised by Cereal Docks S.p.A. via web portals  
in accordance with Art. 13 of (EU) Regulation 2016/679 of the European Parliament and the Council of 27 April 2016

In accordance with article 13 of the General Data Protection Regulation – (EU) Regulation 2016/679 of the European Parliament and the Council of 27 April 2016 with regard to the protection of physical persons concerning the processing of personal data, as well as the free movement of said data (hereinafter called “GDPR”), we endeavour to provide you with some information regarding the processing of your personal data provided in the area of the relationship with **Cereal Docks S.p.A.**

<b>Data processing controller</b>
The Data Processing Controller is <b>Cereal Docks S.p.A.</b> , with registered offices in Camisano Vicentino (VI), Via dell’Innovazione No. 1, taxpayer’s code and registration number in the Vicenza Companies Registry: 02218040240 (hereinafter also called “ <b>Controller</b> ” or “ <b>Company</b> ” or “ <b>Cereal</b> ”).
<b>Data Protection Officer (hereinafter called “DPO”)</b>
The Controller relies on the group DPO appointed in accordance with Art. 37, paragraph 2 of the GDPR. The DPO’s contact information can be found on the Controller’s website or at their headquarters. To exercise your rights and for any communication, problems and/or requests for clarification concerning the protection of your personal data, feel free to contact the DPO.

### ***Compulsory purposes for which the processing does not require your consent***

<b>Purpose</b>	<b>Legal base of the processing</b>
Management of events organised or sponsored by the Company.	(Art. 6, paragraph 1, subsection b), GDPR) Fulfilment of a contract
To manage filing and storage of data, information, communications, including electronic, and documents inherent to the relationship with the Company.	(Art. 6, paragraph 1, subsection c), GDPR) Processing necessary to fulfil a legal obligation to which the Controller is subject

### ***Optional purposes for which the processing does not require your consent***

<b>Purpose</b>	<b>Legal base of the processing</b>
Sending invitations to events organised or sponsored by the Company.	(Art. 6, paragraph 1, subsection f), GDPR) Processing necessary to pursue the legitimate interest of the Controller connected to their own organisational and commercial management

### ***Optional purposes for which the processing does not require your consent***

<b>Purpose</b>	<b>Legal base of the processing</b>
Disseminate - also on TV, websites, social profiles and other means of communication (brochures, flyers, etc.) - audio and video footage as well as photographic images taken on the occasion of	Art. 6, paragraph 1, letter. f), GDPR) Processing necessary for the pursuit of the legitimate interest of the Data Controller in documenting the event

#### **CEREAL DOCKS SPA Benefit Company**

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<p>events organized by the Company (the "Event"), for purposes informative, informative and promotional</p>	<p>(Art. 6, paragraph 1, letter a), GDPR)</p> <p><b><u>Consent of the interested party</u></b></p> <p>Participation in the event is optional. During the event, audio, video and photographic recordings will be carried out which could portray, even in close-up, those present and be subsequently disseminated for information, dissemination and promotional purposes.</p> <p><b><u>The interested expresses his/her consent to the processing of personal data (photographic images, audio and video), for the indicated purpose, by going and participating in the Event in which the photographic and video shooting service is active (conclusive behavior).</u></b></p> <p>The installation and use of the images are to be considered free of charge. The right to use the images is intended to be granted for an indefinite period.</p>
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### **Personal data recipients**

In order to pursue the purposes indicated above, your personal data may be communicated to:

- employees and/or staff of the Controller, duly appointed as authorised subjects and instructed on the processing methods of said data;
- other companies in the 'Cereal Docks' Group for the management of specific functions and/or services;
- third parties other than the Controller, such as:

<b>Third parties or categories</b>	<b>Purpose</b>	<b>Notes</b>
Information technology companies	Management, maintenance, updating of the systems and software used by the Controller	
Providers of networks, electronic communication services, and information technology and telematic services of data archival, storage and management	Hosting, housing, Cloud, SaaS, and other remote digital services indispensable for distributing the Controller's operations; archival and storage services of electronic documents in accordance with regulations	Cloud services could imply data processing in countries outside the EU which guarantee suitable confidentiality rights.
Communication agencies, web agencies	Informative, outreach, and promotional activities	
Consultants, professionals, law firms, arbiters, insurance companies, experts, brokers; other providers of services connected to the activity of customers/suppliers	Legal activity, extra-legal activity, insurance activity in the case of claims Organisational, administrative, financial, and accounting management	
Banks or institutes, companies, and agencies of any type which	Organisational, administrative, and financial management	

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conduct activities of banking, credit, leasing, factoring, financing - including intermediation - and inherent, complementary, or similar activities		
Local Governments and Public Bodies in general	Management of requests by monitoring agencies	
Public Safety Authority and Judicial Authority	Management of investigations by investigative bodies in the case of claims	

The Cereal Docks Group companies and third parties to whom your personal data may be communicated act as:

- data procession controllers, in other words, subjects who determine the purposes and the means of processing personal data;
- processing managers, in other words, subjects who process personal data on behalf of the Controller;
- data processing co-controllers who determine the purposes and the means of the same jointly with the Company.


The list and the updated information of the subjects identified as controllers, managers, or co-controllers are available at the Company.

**Storage period of the personal data**

Below, we will illustrate the storage period of the personal data or, if it is not possible, the criteria used to determine said period.

<b>Personal data and documents</b>	<b>Storage period or criteria to determine it</b>
Personal data and contact information	For the period necessary to pursue the processing purposes and even subsequently, within the limits allowed by the law, as well as to enforce or protect the rights of the Controller, where necessary.
Audio recordings, videos and photographic images	For the duration necessary to pursue the purposes of the processing and also subsequently, within the limits permitted by law to assert or protect the rights of the Data Controller, where necessary

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### **The interested party's rights**

We hereby inform you of the existence of some rights set forth in the GDPR with regard to personal data and the relevant processing which you may request of the Controller.

<b>Right</b>	<b>Description</b>	<b>Method to render it effective</b>
Right of withdrawal of consent (art. 13, para. 2, letter c)	Right to withdraw consent for processing for which it is required, at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.	Forms on the website or available from the Controller
Right of access by the data subject (Article 15)	You may request: a) the purpose of processing; b) the categories of personal data in question; c) the recipients or the categories of recipients to whom the personal data has been or will be communicated, in particular if they are recipients from third-party countries or international organisations; d) when possible, the anticipated period of storage of the personal data or, if it is not possible, the criteria used to determine said period; e) the existence of the right of the interested party to ask the data processing controller to rectify or delete personal data or limit the processing of their personal data or oppose to its processing; f) the right to file a complaint with the monitoring authority; g) should the data not be collected from the interested party, all the available information concerning its origin; h) the existence of an automated decisional process, including the profile pursuant to article 22, paragraphs 1 and 4 and, at least in these cases, significant information on the logic used, as well as the importance and the consequences anticipated by said processing for the interested party. You have the right to request a copy of the personal data being processed	Forms on the website or available from the Data Processing Controller
Right to rectification (Article 16)	You have the right to request the rectification of incorrect personal data concerning you and to obtain the integration of incomplete personal data	Forms on the website or available from the Data Processing Controller
Right to be forgotten (Article 17)	You have to right to obtain the cancellation of your personal data from the Controller if the personal data is no longer necessary with respect to the purposes for which it was collected or otherwise processed	Forms on the website or available from the Data Processing Controller
Right to restriction of processing (Article 18)	You have the right to obtain from the Controller the restriction of the processing when you have ascertained the inaccuracy of the personal data (for	Forms on the website or available from the Data Processing

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	the period the Controller needs to verify the inaccuracy of said personal data) or if the processing is unlawful, but you oppose the cancellation of the personal data and request instead that its use be limited or if they are necessary for the ascertainment, exercising, or defence of a right in court, whereas they are no longer needed by the Controller.	Controller
Right to portability (Art. 20)	You have the right to receive, in a structured, commonly used format legible from an automatic device, your personal data provided to us and you have the right to transmit it to another controller if the processing: (i) is based on consent, (ii) on the contract, and (iii) if the processing is carried out with automated means, unless the processing is necessary to execute a task of public interest or connected to the exercising of public powers and that said transmission does not infringe on the rights of a third party.	Forms on the website or available from the Data Processing Controller
Right to object (Article 21)	You have the right at any time to oppose, entirely or partially, to the processing of your personal data should the processing be carried out to pursue a legitimate interest of the Controller, in other words, should the processing be carried out for direct marketing purposes. In this case, the personal data will no longer be processed for these purposes.	Forms on the website or available from the Data Processing Controller
Right to lodge a complaint with a supervisory authority (Article 77)	You have the right to lodge a complaint with the supervising authority should you believe that the processing concerning you violates the GDPR.	

Exercising the aforementioned rights is subordinate to the limits, regulations, and procedures set forth by the GDPR and which the interested party must know and enact. Moreover, in accordance with the provisions of article 12, paragraph 3, the Controller will provide the interested party with the information regarding the action taken without unjustified delay and, in any case, no later than one month from receiving the request. This term will be extended by two months, if necessary, taking into account the complexity and the number of requests. The Data Processing Controller informs the interested party of said extension and the reasons for the delay within one month of receiving the request.

### **Changes and amendments**

This advisory may be subject to changes and/or integration, including as a consequence of the applicability of the GDPR and any future regulatory changes and/or amendments.

The amended advisory is constantly available from the Controller.

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The personal data provided may be processed by the Controller with and without the aid of digital instruments.

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Furthermore, we hereby inform you that the communication of your personal data for the compulsory purposes indicated is a necessary requirement in order to carry out contractual or pre-contractual obligations, therefore you must provide the personal data because otherwise the relationship with the Company cannot be managed.

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