



## **Privacy policy**

### **Processing of personal data relating to subscription to the BEVERTECH event newsletter**

*Art. 13 of the Regulation (EU) 2016/679 (General Data Protection Regulation)*

The personal data provided by the User with the completion of the form relating to the request for subscription to the newsletter service (hereinafter, also the "Service") referring to the Bevertech event (the "Event") are collected and processed by Ipack Ima S.r.l. ("IpackIma") and UIV – Unione Italiana Vini Servizi Società Cooperativa ("UIV"), as joint data controllers ("Joint Data Controllers") for the purposes and in the manner described below.

In particular, the user's personal data are collected and processed for the following purposes:

- a) to follow up on the User's request to subscribe to the newsletter service of the Joint Data Controllers concerning communications with editorial and informative content relating to the Event as well as market data relating to the reference market Liquid Food&Beverage (the "Service"). The Joint Controllers process such data based on the performance of the pre-contractual measures adopted at the User's request pursuant to art. 6(1)(b) of the GDPR;
- b) to perform all administrative, organisational, technical and security measures necessary to provide the requested service (e.g. to ensure the security of the networks and systems used to provide the services). The Joint Data Controllers process such data on the basis of their legitimate interest pursuant to art. 6 (1) (f) of the GDPR;
- c) to perform statistical analysis on aggregated data for Service delivery. The Joint Controllers process such data based on their legitimate interest pursuant to art. 6 (1) (f) of the GDPR;
- d) to automatically analyse and evaluate user behaviour and preferences in relation to the interests shown in order to personalise the Service rendered (profiling purposes). The Joint Controllers process such data based on the consent given by the User pursuant to art. 6(1)(a) of the GDPR. The User always has the right to withdraw their consent at any time, without affecting the lawfulness of the processing based on the consent given before its withdrawal;
- e) to establish, exercise or defend the rights of the Joint Controllers in legal proceedings. The Joint Controllers process such data based on their legitimate interest pursuant to art. 6 (1) (f) of the GDPR;

In the event that the User does not give their consent for the purposes referred to in letter d), the User's personal data marked as mandatory – with (\*) – are: e-mail and language. The provision of this personal data marked as mandatory is necessary to follow up on the newsletter subscription request, to carry out the related administrative, organisational, technical and security activities required for its delivery, to perform statistical analysis on aggregated data for Service delivery and, if necessary, to allow the Joint Controllers to establish, exercise or defend their rights in legal proceedings. If the user does not provide the personal data marked as mandatory, the newsletter subscription process cannot be completed. The provision of additional data – not marked with (\*) – is optional, and their failure to be provided will not, in any case, affect the use of the requested Service."

Instead, should the User give their free, specific, informed and unambiguous consent for the purpose referred to in letter d), in addition to email and language, the User's personal data marked as mandatory – with (\*) – are: name, surname, reference company, job title/role and country. The communication of this personal data



is necessary to follow up on the User's request to receive the personalised Service in relation to the automated analysis and evaluation of the User's behaviour and preferences based on their expressions and interests. Should the User fail to provide the aforementioned personal data marked as mandatory for purpose d) only, they will not be able to receive the personalised Service.

The Joint Controllers remind the User that should they wish to receive the Service without any personalisation, they may refuse consent – by not agreeing – to the purpose referred to in letter d) and, as mentioned above, the only mandatory personal data – marked with (\*) – required are: email and language.

The User's personal data processed for the purposes referred to in letters a) and b) will be kept for the period of subscription to the Service as well as until the exercise of the right of opposition to receive the newsletter by the User. The User may object, at any time (immediately or subsequently), to the sending of such communications, by sending an objection message from the relevant email box to the box of the Joint data Controllers or by clicking on the appropriate link ("unsubscribe") contained in each email communication.

The User's personal data processed for the purposes referred to in letter c) will be kept for the six (6) months following the collection of personal data.

The User's personal data processed for the purposes referred to in letter d) will be kept for a period of thirty-six (36) months from the date of acquisition of consent due to the two-yearly frequency of the Event. The Joint Data Controllers reserve the right, before the end of the defined retention period, to send the User a request for renewal of consent for the purposes referred to in letter d), in the most appropriate manner and in compliance with the legislation on the protection of personal data. In the event that, prior to the end of the previously stated retention period, the User objects to receiving the newsletter, the processing of personal data for the purpose d) shall consequently cease.

The User's personal data processed for the purposes referred to in letter e) will be stored in accordance with the applicable statutory limitation period.

For the above-mentioned purposes, the User's personal data:

- a) are processed by the Joint Controllers also by electronic means, mostly automated procedures, and methods suitable to ensure data security and confidentiality;
- b) may be accessed by employees and collaborators of the Joint Controllers, who are duly authorised and belong to the relevant departments responsible for carrying out the administrative, technical and security activities related to the provision of the requested Service;
- c) may be disclosed by the Joint Controllers to Fiera Milano, other companies belonging to the group and trusted third-party providers acting as Data Processors on behalf of the Joint Controllers. These parties handle, among other tasks, administrative, organisational, technical and security activities related to the provision of the requested Service, data processing, etc. The complete list of recipients or categories of recipients is available from the Joint Controllers' registered offices;
- d) in general, data will not be transferred outside the EU. However, should data be transferred to countries outside the EU, such activity shall only be carried out in compliance with European Commission adequacy decisions—which recognise the adequacy of the data protection laws in force in those countries—or on the basis of appropriate safeguards (such as Standard Contractual Clauses or Binding Corporate Rules for groups). In the absence of such conditions, transfers will only occur if authorised by the User or if necessary for the performance of a contract with or in favour of the User. In any case, if the data



are transferred outside the EU, the Joint Data Controllers will provide the information required pursuant to art. 13, paragraph 1, letter f) of the GDPR.

The provisions of the GDPR (Articles 15-21) guarantee the User the right to access their personal data at any time, to rectify or supplement them if inaccurate or incomplete, to delete them or obtain the restriction of their processing where the relevant conditions are met, to object to their processing for reasons related to the data subject's particular situation and, in any case, to their processing for direct marketing purposes, as well as to request the portability of the data provided, if processed by automated means for the execution of the contract or based on the data subject's consent. The User also has the right to withdraw consent, where required, without affecting the lawfulness of processing based on consent before its withdrawal. Finally, the User's right to contact the Italian Data Protection Authority remains unaffected, including by filing a complaint if deemed necessary for the protection of their rights.

For the exercise of these rights and any request regarding the processing of personal data, the User may contact the Joint Controllers, which are Ipack Ima S.r.l., with registered and operating office in S.S. del Sempione 28, 2019 Rho (Milan), e-mail address [privacy@ipackima.it](mailto:privacy@ipackima.it) and UIV – Unione Italiana Vini Servizi Società Cooperativa, with registered office in via S. Vittore al Teatro no. 3 – 20123 Milan, email address [privacy@uiv.it](mailto:privacy@uiv.it).

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