

Privacy Policy provided pursuant to art. 13 EU regulation /2016/679 regarding personal data processing (GDPR)

Last update: December 2020

This privacy policy, compiled pursuant to D.lgs. (legislation) 196/2003 and of UE Reg. /2016/679, is provided for Interested Parties employing the Platform to participate in the “SIEL 2021 Global Conference” event, hereafter also simply “LiveForum”, and applies to personal data we process as title holders of data processing. It has to be clarified that some data will be directly given by the Involved Parties, whilst others are gathered through the interactions, usage and experiences with the service. The data we gather depend on the context of the user’s interactions with LiveForum and the choices they made, for instance the used functionalities.

For this purpose, we foreshadow the following:

- *Interested party* is the natural person to whom personal data belong.
- *Title holders of the data processing* are the company SIEL (Society of International Economic Law, with legal head office in Society of International Economic Law, c/o Dickson Poon School Of Law head office in Kings College London, Strand, London, England
- The Title Holders of the Data Processing have appointed *Responsible for Data Processing*:
- LiveForum s.r.l., with legal head office in Milan (20143 – MI), viale Cassala, 36, VAT n. 11269810963, editor and maintainer of the Platform hosting LiveForum and responsible for processing users’ personal data gathered through the Platform. (Hereafter also referred to as Responsible).

The Title Holders of the Data Processing have established the respective responsibilities through an internal co-ownership agreement, with particular consideration towards the exercise of rights of the Interested Party and the respective functions regarding communicating information as under articles 13 and 14; the essential content of the agreement is put at disposal of any interested party requesting it.

1 Purpose and legal basis of the data processing.

The contribution of data requested during the registration phase to LiveForum is free and optional but necessary and can be revoked by the interested party at any time; missing contribution of data required as mandatory on the registration page implicates the impossibility to supply the indicated services. Personal data provided by the Interested Party will be used for the purposes shown below:

1.1 Supply of requested Services

- i. management of the access request to LiveForum and consequent management of all relative compliances and relative registration to the Platform;
- ii. usage of services supplied through the Platform, among which virtual visits to booths, possibility to participate to live Plenaries and Workshops, access to Meeting Rooms, scheduling of appointments, interaction with other participants and Exhibitors, through functionalities put at disposal by the Platform among which live chat, video conferences, etc..., to which purpose please refer to Section 1.2, dedicated to the specifications;
- iii. for sending notifications concerning appointment or contact requests by other LiveForum subscribed users and by Exhibitors and Sponsors, and to allow interaction between connected users;
- iv. fulfilment of organizing and administrative activities;
- v. management of information and technical assistance requests by the Interested Party via contact form, spontaneous emailing, telephone contact or with other modalities;
- vi. for carrying out any potential legal, accounting or fiscal obligations;
- vii. sending of updates and information about LiveForum to the Interested Party, as well as communications regarding future Events organized by the Title Holders;
- viii. sending of updates and information about services offered by a specific Exhibitor or Sponsor during the LiveForum, in case the Interested Party has participated to virtual Workshops, Meeting Rooms or visited virtual booths belonging to the specific Exhibitor or Sponsor or took part in Plenary Sessions and only

with regards to similar products or services (so-called “soft spam”). It has to be clarified that in this case any potential promotional messages are sent only by the specific Exhibitor or Sponsor and not by Third Parties, and such communication can only concern products and services similar to those discussed during the LiveForum, without prejudice to the possibility for the Interested Party to oppose the processing as in this point via simple request, as better explained later on.

Legal Basis. With regards to the purposes listed in the present section Section 1.1. (i) (ii) (iii) (iv) (v), the lawfulness of the processing is pursuant to art. 6, clause 1, lett. b) of EU Reg. /679/2016, i.e for the necessity of processing personal data for supplying the Services requested by the Interested Party and to meet the Interested Party’s requests. With regards to the purposes discussed in sub-section (vi), the processing is made pursuant to art. 6.1.c) of the Regulation for fulfilling of legal obligation. With regards to the purposes discussed in sub-section (vii), data can be processed for purposes of direct sending of informative material on new physical and digital editions of the LiveForum, believing those will be appreciated by the Interested Party. Lastly, with regards to purposes discussed in sub-section (viii), data can be processed for purposes of direct sending of informative material and updates related to services offered by the Exhibitor or the Sponsor also during the LiveForum, believing it to be appreciated by the Interested Party. Processing of your personal data as discussed in sub-sections (vii) and (viii) is also based on the legitimate interest of which under art. 6.1.f) of the Regulation and under art. 130 clause 4 D.lgs. (legislation) 196/2003 (so-called. “soft spam”), also in relation to the Whereas clause n. 47 of GDPR. In any case, as pursuant to art. 21 of the Regulation, you are entitled to oppose to said processing at any time via the mechanisms put at your disposal: direct opt-out (e.g. in the invite emails) or by writing to the specific Title Holder(s) or Responsible (art. 7 of the policy) to ask for the termination of the communications and the exercise of rights of the Interested Party.

1.2 Access to Platform’s functionalities and Third Parties

The users’ personal data processing is implemented to allow the Interested Party the full access to all services and functionalities of the Platform, which provides areas dedicated to Plenary Sessions, virtual Workshops, Meeting rooms and Exhibitors’ Booths, for whose usage it has to be specified as follows:

- i. navigation in such virtual areas inevitably means visibility of your personal data (e.g. name, surname, company, company role, etc.) also to Third Parties (e.g., other connected users);
- ii. navigation in the Platform and interaction of the Interested Party with the Exhibitor and/ or Sponsor, the scheduling of an appointment or the participation to Workshop sessions imply the visualisation and acquisition of the Interested Party’s data by the aforementioned Exhibitor and/ or Sponsor. The Interested Party will also be entitled to decide whether to give the Sponsor/ Exhibitor other personal data, which can then be used by such Sponsor/ Exhibitor for marketing purposes and therefore managed as autonomous Title Holders;
- iii. simple access to the platform (without entering virtual Workshops, Meeting Rooms, Exhibitors’ Booths and Plenary Sessions) does not imply any share of personal data of the Interested Party with Third Parties and will not allow sending the Interested Party any updates or information regarding services offered by any Exhibitor or Sponsor during the LiveForum.

Legal Basis. The data processing activities discussed in this Section 1.2 are bound to the access to services offered by the Platform itself, and their lawfulness is pursuant to art. 6, clause. 1, lett. b) of the EU Regulation /679/2016, i.e. for the necessity of processing personal data to supply services requested by the Interested Party and to meet the Interested Party’s requests. The consent can be revoked at any time, the specific revocation of the consent with regards to data processing as discussed in this Section 1.2 will not be interpreted as revocation of the consent regarding the previous Section 1.1 as well.

1.3 Personal images processing

Throughout the LiveForum, the Interested Party's profile picture could be visible (for instance it could be obtained from their LinkedIn profile pursuant the registration), moreover videos, frames, pictures, photos and multimedia materials could be created in which the user's image and data (name and surname) and/ or voice could, even incidentally, be incorporated.

Acquisition and/or realisation of such materials could occur for LiveForum's informative and promotional purposes, or for making them available to the public and/ or media (press, tv), and the social media.

It has to be noted that under no circumstances will virtual meetings in Meeting Rooms be recorded.

The acquired images are processed pursuant the normative regarding the copyright (RD 633/1941), the regulation regarding the employment of third party's images (art. 96 onwards RD 633/1941) and the EU Regulation /679/2016. In light of the above, the Interested Party, acting as declarant, authorizes, having nothing to claim, the Title Holders and the Responsible to record and/ or acquire the aforementioned material, for the above specified purposes and therefore declares that:

- a. they refuse any claim or demand, even of economic nature, relative to any future employment of the recordings at issue in this consent form, towards the Title Holders and Responsibles explicitly authorized to use such contents;
- b. they relieve the Title Holders of any responsibility, even if economic, concerning any improper employment of the photographic and/ or audio-video material by the users of any website, social network or more generally by any third party;
- c. they have read and understood the whole notice of this consent form and are aware that flagging the checkbox is equivalent to signing the policy and giving consent under their own responsibility.

Legal Basis. With regards to the purposes listed in this Section 1.3, the lawfulness of the processing is based on your free and discretionary but necessary consent, of which under art. 6, clause 1, lett. a) of the EU Reg. 2016/679/; such consent is also given pursuant art. 9, clause 2, lett. a) of the EU Reg. 2016/679/ (explicit consent given by the Interested Party).

1.4 Communication of services and activities by the Title Holders.

The data supplied by the Interested Party will be processed for the sending of update communications regarding the activities and initiatives organised by the Title Holders, all communications having as subject matter only the development of the sector object of the LiveForum. Such communications could occur through Newsletters and promotional and/ or commercial communications (so-called Soft spam).

Legal Basis. With regards to the purposes of this Section 1.4, the processing's lawfulness is pursuant article 6, clause 1, letter f) of the EU Reg. /679/2016, i.e., on the Interested Party's consent and the legitimate interest of the Title Holders to offer a better service more pertinent to your preferences.

It has to be noted that your data can be treated as under article 6, clause. 1, lett. f) of the Regulation and as under article 130 clause 4 D.lgs. (legislation) 196/2003 (so-called "soft spam"), assuming your interest on being updated on new initiatives. The consent can be in any case be revoked at any moment using the opt-out mechanisms put at your disposal (following the instructions given in any communication or newsletter) or contacting the Title Holders or the Responsible via the contacts specified in art. 8 of this notice. The data could only be processed respecting the general prohibition to have you undergo any decisional process internally mechanized to analyse the workshop area participants' interests with the aim of understanding their interests and offer aimed communications pertinent to their preferences related to a specific area or product sector, therefore to also allow the improvement of the offered services

2. Data contribution and consequences of lacking consent.

As specified in the aforementioned sections, registration to the platform is free and discretionary and assumes having viewed this notice. Contribution of the data contained in the Platform's registration form is mandatory for the purpose of allowing the registration itself and the supply of the required services. The lack of such data

contribution will cause the failure of the registration to the Platform and consequently the impossibility to access its content and functionalities.

3. Personal data subject matter of the processing.

The processing has as subject matter common personal, identifying and IT data of the Interested Party, specifically:

a. Navigation Data

IT systems and software procedures appointed for the Platform's and website's functioning acquire a set of Personal Data in the normal course of their exercise, whose transmission is implied in the use of Internet communication protocols. This refers to information which could in its own nature permit the users' identification through processing and connection with data held by third parties. This category of data includes IP addresses or any domain name of computers employed by users connecting to the website, the addresses in URI (Uniform Resource Identifier) notation of the requested resources, the request's time, the method used to submit the request to the server and other parameters related to the operating system and the user's IT environment. These data are employed solely for the purpose of extract anonymous statistical information on the Website's usage and to control its correct functioning, to identify any anomaly and/ or abuse, and are deleted immediately after processing.

b. Data contributed directly by the Interested Party.

Identifying data relative to the Interested Party, among which: name, surname, profile picture and other information suitable to their identification or useful to this purpose such as the name of the company in which they work, their professional title, etc. Such information is acquired following the registration to the Platform – through the designated form – and pursuant navigation; all data can moreover be communicated via the information request form or via email.

4. Subjects of the Processing.

The data could be processed:

- by the Title Holders and the Responsible for the processing with regards to the aforementioned purposes, as well as any potential other responsible who can in case be appointed;
- by legal subjects with whom it might be necessary to interact in order to supply the Services (for instance, the hosting providers);
- by third parties designated as Responsibles, as included in the following categories: companies offering services for sending of emails and/ or conducting invoicing and/ or tax management activities, companies offering services for the management and maintenance of the Platform's IT infrastructure;

The data could also be communicated to:

- third parties, Exhibitors or Sponsors of the LiveForum, also by reason of what specified in Paragraph 1 of Section 1.1 (viii) and 1.2 (ii) and to whom the Interested Party has given their consent to the communication of personal data for further marketing purposes. In that case, the aforementioned companies will be in charge of releasing an additional privacy notice as under art. 14 EU Reg. /679/2016.
- Judicial Authorities, in regard to their request, to third parties for the fulfilment of fiscal or administrative obligations, or if needed to the achievement of the aforementioned purposes.

Personal data of the Interested Party registered to the Platform will in no way be broadcasted or transmitted to third parties conversely to what is envisaged in this Notice. With regards to personal image, please refer to what specified in Art. 1.3 of this notice.

5. Procedure and place of the processing.

Personal data will be subject to gathering, processing, registration and consultation, retention, made available to third parties and extrapolated within the terms, modalities and limits of this Notice; in any case, data processing will be carried out complying with the purposes for which they are gathered by the personnel, which is purposely appointed by the Title Holders and the Responsible for the processing, via paper-based, IT or telematic systems.

More precisely, the data will be processed by:

- SIEL, with legal head office as above

- LiveForum s.r.l., with legal head office in Milano (20143 – MI), viale Cassala, 36, VAT identification number 11269810963, by means of its marketing and communication area's personnel, at its head office and on servers located in its headquarters.

6. Duration of the processing and time span of data Retention.

The Interested Party's data will only be processed for the time span necessary for achieving the aforementioned purposes by the personnel purposely appointed by the Title Holders and Responsible for the processing.

The data are retained in hardcopy and electronic archives at the head offices of the Title Holders and Responsibles for the processing (for the time span necessary to fulfill their task) in order to allow pursuing the necessary goals with full assurance that the security measures expected by the legislator aiming at protecting the gathered data will be implemented, for the purposes of avoiding the risks of lost or theft of data, non-authorized access, illegal and irregular usages.

It has to be noted that, in any case, accounting data of the Interested Party could be retained for a maximum span of ten years, whereas personal data of the Interested Party could be retained for a maximum span of twenty-four months since the closing the LiveForum.

7. Rights of the Interested Party.

The Interested Party can exercise their rights provided by articles 15 to 22 and 34 of the EU Reg. /679/2016 at any time, more specifically the Interested Party:

- Can exercise the right to access the personal data (art. 15 Reg.),
- Has the right to obtain the amendment of the incorrect personal data (art. 16 Reg.);
- Has the right to obtain the cancellation of data if the conditions specified under article 17 of the Reg. occurred;
- Has the rights to obtain the limitation of the processing if the conditions specified under article 18 of the Reg. occurred;
- Has the right to ask for their data's portability (art. 20);
- Has the right to oppose against mechanized processes, including any potential profiling activities; it has in any case to be noted that no decision solely based on the mechanized data processing is provided; (art. 21).

Moreover, the Interested Party will be able to exercise, at any time, the right to revoke the consent given for one or more purposes without consequently compromising the lawfulness of the processing based on the consent given before the revocation.

The Interested Party also has the right to register a complaint to the national controlling Authorities, i.e., the Warrantor for the personal data protection, with head office in Piazza Venezia 11, IT-00187, Roma (<http://www.garanteprivacy.it/>)

The requests have to be addressed to:

- SIEL, with legal head office as above
- LiveForum s.r.l., with legal head office in Milano (20143 – MI), viale Cassala, 36, to the following email address: privacy@liveforum.net .

8. Contact Information.

- Title Holders of the processing are SIEL with legal head office as above;
- LiveForum s.r.l., with legal head office in Milano (20143 – MI), viale Cassala, 36, to the following email address: privacy@liveforum.net .