

## ANNEX I

# POLICY PURSUANT TO THE GENERAL DATA PROTECTION REGULATION

### INTRODUCTION

Unione Italiana Vini Servizi soc. coop, with registered offices at: via San Vittore al Teatro, 3, 20123 Milan, Tax Code and VAT no. 00868400151, as data controller (hereinafter, "Data Controller"), hereby informs you, pursuant to Articles 13 and 14 EU Regulation no. 2016/679 (hereinafter, "GDPR") and in compliance with Legislative Decree no. 196/03 (hereinafter, "Privacy Code" as amended by Legislative Decree 101/18), that your data will be processed in the following ways and for the following purposes:

#### 1) Subject of the Data Processing

Given the services and products proposed by our organisation to exhibitors wishing to take part in our trade fair activities (ENOVITIS), the Data Controller processes personal, identifying data not included in special categories (for example: name, surname, tax code, email, telephone number (hereinafter, "personal data" or also "data") communicated by you when requesting services from our organisation and/or when defining contractual agreements and/or promotional initiatives and for the purposes set out below.

#### 2) Purpose of the processing and legal basis of the processing

Your personal data is processed:

A) without your express consent, because it derives from legal and/or contractual obligations or refers to legitimate interests (Privacy Code and Article 6 - GDPR) for the following purposes:

- to manage and maintain the services requested by the data subject and to find the data subject for the organisation of the requested services;
- to fulfil pre-contractual, contractual and tax obligations deriving from existing relationships with you;
- to fulfil the obligations established by law, by a regulation, by EU legislation or by an order of the Authorities, including accounting, tax aspects;
- to prevent or discover fraudulent activities or malicious activities and/or for the purposes provided for by current anti-money laundering legislation;
- to fulfil compulsory requirements based on organisational and management model requirements based on specific recognised standards (e.g., ISO, UNI standards, etc.) required by law and/or specific contractual requirements requested by the data subject and/or specified as a service requirement;
- to exercise the rights of the Data Controller, for example the right to defence in court proceedings;
- to find the data subject for information relating to the services requested and their management;
- to allow for registration for the services and allow the sending of useful information to the data subject based on the services requested;
- to allow for specific data processing for the services requested and falling within the cases referred to in Article 9 paragraph 2 from letter "b" to "j";
- for legitimate interest related to commercial communications updating the initiatives of our organisation.

Regarding the data collected by the WEBSITE:

- to allow for registration on the website;
- to manage and maintain the website;
- to prevent or discover fraudulent activities or malicious activities harmful to the website. For operational and maintenance purposes, this website and any third-party services may collect files that record the interaction taking place through this website (system logs) or use other personal information (such as IP address) for this purpose;
- for legitimate interest related to communications (including commercial communications) updating the initiatives of our organisation and/or deriving from applicable regulatory/legislative requirements.

B) Only with your specific and distinct consent (Article 7 GDPR and as per Legislative Decree 196/03), for the following purposes:

B.1 Data processing to improve services not necessary for carrying out the operations indicated in point 2 A), but aimed at improving the services requested, and in any case always obtained directly from the data subject. Requirements for the development of the processes and services required

by the management systems and organisational models implemented, but not compulsory and not related to specific standards. The data will be used to speed up subsequent requests for services from our organisation before, during and after the trade fairs;

B.2 Marketing and/or commercial purposes: sending commercial communications and/or advertising material on UIV products or services, including trade fairs organised by the UIV and commercial communications/promotional material on products or services that do not fall within the legitimate interests (such as the Corriere Vinicolo di Unione Italiana Vini newsletters and/or third-party services/products). This will be done using both automated contact methods (email, SMS, mms, whatsapp, fax, newsletter) and traditional methods (paper mail). Please note that if you are already our Exhibitor, we may send you commercial communications relating to services and products that are similar to those you have already used, unless you indicate that you do not wish to receive such communications (Privacy Code);

B.3 Use of audio-video recordings and photographs: their vision and duplication, where the data subjects are filmed, exclusively for the activities and services requested from our organisation (such as participation as auditors or speakers in all possible exhibition activities: Conferences, Workshops, press conferences, work tables, digital and/or in-person forums, Webinars, training courses) and/or for promotional activities of the same (such as publication on our website or on our social networks) and not for other commercial purposes. It is specified that in the case of participation in digital call-conferences, data subjects will be free to use their own audio-video devices and configuration data as they wish (so they can even choose to disable them or change their account name). This data may be used free of charge (pursuant to Articles 10 and 320 of the Italian Civil Code and Articles 96 and 97, law 22.4.1941, no. 633, Copyright Law). In other cases of use of audio-video recordings, a specific disclaimer will be required;

B.4 Marketing and/or commercial purposes of partners: sending commercial communications and/or advertising material on products or services of the institutional partners who have organised the trade fair for which you have signed up as an Exhibitor.

For other purposes, the data controller will be responsible for defining specific information and related consent requirements and/or additions for the processing.

This information sheet does not cover any processing by other subjects that can be obtained through any links on the site and for which reference should be made to the specific policy.

#### 3) Methods and duration of the processing

The processing of your personal data is carried out by means of the operations indicated by Legislative Decree 196/03 and Article 4, n° 2) GDPR and namely: the collection, recording, organisation, retention, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of data. Your personal information is subject to both paper and electronic and/or automated processing.

The Controller will process the personal data for the time necessary to comply with the purposes indicated above and in any case for no longer than 10 years from the termination of the relationship for the purposes as specified in point 2 A) (except for legislative requirements). For the purposes referred to in point 2 B), on the other hand, it will process the data until the consent is withdrawn or after 5 years from the interruption of relations/communications with the data subject since the first collection.

Profiling: no automated profiling is carried out.

#### 4) Access to Data

You can access your data at any time by making a simple request to the addresses indicated in this policy.

#### 5) Data communication

Your data may be rendered accessible for the purposes referred to in Article 2

### General Secretariat

Unione Italiana Vini Servizi soc. coop.  
Via S. Vittore al Teatro, 3 - 20123 Milan (Italy)  
Tel. +39 02-72222825/26/28  
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A) and 2 B):

In addition to the communications and disclosures made pursuant to legal obligations, the Data Controller may communicate your data, in Italy and/or abroad (as indicated in the following points) to:

- the Controller's employees and contractors, as persons appointed and/or persons responsible for the processing and/or system managers;
- technicians and/or contractors for administrative, tax and accounting management and/or to fulfil specific legal obligations or for which external suppliers have been appointed;
- our network of agents; factoring companies; credit institutions; debt collection companies; credit insurance companies; commercial information companies for the services requested; professionals and consultants; companies operating in the transport sector; technicians and contractors appointed to provide the services/products requested, supervisory bodies, judicial authorities as well as all other subjects to whom the communication is obligatory by law for the fulfilment of the aforesaid purposes; legal entities entrusted with the services referred to in this information;
- companies or other legal entities, qualified and appointed pursuant to Article 28 of Regulation 679/16, for support activities including: management and development of communication, management and development of business processes and projects, communication and promotion systems, for the storage of personal data. Access may be granted to third parties and associated companies, which provide services deemed necessary and/or useful by the Controller for the management of the company business and the related support processes or those you have requested. Suppliers include IT systems maintenance companies; credit institutions, professional firms, companies that provide services on IT systems/platforms that the Data Controller deems useful to use, companies that carry out outsourcing activities on behalf of the Data Controller, in their capacity as external data processors;
- it may be necessary to communicate data to recipients for legislative obligations and/or obligations deriving from the data controller's organisational structures that involve the presence of independent subjects with the possibility of being recipients of data to fulfil the legislative obligations deriving from the role held. Among these recipients we can identify supervisory bodies, inspectors of third parties, persons who carry out AUDITS of our organisation, subjects and/or entities that carry out controls at our organisation.

The institutional Partners of the Data Controller (see par. 14), are not authorised to use the data for purposes other than those given in this document. If this were necessary, the use of the personal data of the interested party must make reference to another specific document issued by the Partner and to specific agreements that explicitly refer to the data controller and the purposes in question.

#### 6) Transfer of Data

Your personal data will be managed and stored on servers located within the European Union and belonging to the Data Controller and/or third-party companies appointed and duly identified as Data Processors. Our internal servers are currently located in Europe. The data will not be transferred outside the European Union. It remains anyway understood that the Data Controller, if necessary, will have the right to transfer the servers' location to non-EU countries. In this case, the Data Controller guarantees from now that the transfer of the data outside the European Union will take place in accordance with the applicable legal provisions by stipulating, if necessary, agreements which guarantee an adequate level of protection and/or by adopting the standard contractual clauses required by the European Commission. For some mailing or "storage" services, we rely on "cloud" platforms, which may have servers in non-EU countries, but the data are only temporarily stored for the requested service.

#### 7) Compulsory or optional nature of the provision of data and consequences of refusal to respond

The provision of data for the purposes referred to in Article 2 A) is compulsory. In their absence, we would not be able to guarantee you the services referred to in point 2 A). The provision of data for the purposes referred to in point 2 B) is optional.

You can, therefore, decide not to provide any data or to subsequently deny the possibility of processing data already provided. In this case, you will not be able to receive commercial communications or advertising material concerning the services offered by the Data Controller. However, you will continue to be entitled to the Services referred to in Article 2 A).

#### 8) Rights of the data subject

In your capacity as a data subject, you have the rights referred to in Legislative Decree 196/03 and Articles 15-22 of the GDPR, and specifically:

- A) to obtain confirmation of the existence of any personal data concerning you, even if not yet recorded, and their communication in an intelligible format;
- B) to obtain the indication of: the origin of the personal data; the purposes and methods of processing; the logic applied in the case of processing carried out with the help of electronic instruments; the identification details of the data controller, data processors and the representative designated pursuant to the Privacy Code and Article 3, paragraph 1, GDPR; and of the subjects or categories of subjects to whom personal data may be disclosed or who may become aware of it as the appointed representative in the State, Data Processor officers or persons in charge of processing;
- C) to obtain: the updating, rectification or, when interested, the integration of data; the deletion, transformation into anonymous form or blocking of data processed in violation of the law, including data whose storage is not necessary in relation to the purposes for which it was collected or subsequently processed; certification that the operations referred to in Article 8 A) and B) have been made known to those to whom the data have been communicated or disseminated, even with regard to their content, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the protected right;
- D) to object, in whole or in part: for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of collection; the processing of personal data concerning you for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communications, through the use of automated calling systems without the intervention of an operator by email and/or by traditional marketing methods by telephone and/or paper mail. Please note that with regard to the data subject's right to object, as set out in point B) above, concerning direct marketing through automated methods, this is extended to traditional methods, and the data subject is able to exercise the right to object, even in part. Hence, the data subject may decide to receive only communications using traditional methods, or only automated communications, or neither of the above.

Where applicable, you also have the rights referred to in Articles 16-21 of the GDPR (right to rectification, right to erasure, right to restriction of processing, right to data portability, right to object), as well as the right to lodge a complaint with the Supervisory Authority.

#### 9) How to exercise your rights

You may exercise your rights at any time by sending:

- a registered letter to addressed to: Unione Italiana Vini Servizi soc. coop, with registered offices in: via San Vittore al Teatro, 3, 20123 Milano
- an email to [privacy@uiv.it](mailto:privacy@uiv.it) or PEC to [amministrazione@pec.uiv.it](mailto:amministrazione@pec.uiv.it)
- the organisation makes the form available for data subjects to exercise their rights with a simple request to the addresses listed above.

#### 10) Children

The Data Controller's Services are not intended for children under the age of 14 and the Data Controller does not knowingly collect personal information about children. In the event that information relating to minors is unintentionally recorded, the Data Controller shall promptly delete it at the user's request. For any needs for the treatment of minors, specific consent and authorisation will be requested from the person exercising the authority and/or from the holder of parental responsibility (as required by Article 8 of Regulation 679/16).

#### 11) Controller, processor and persons in charge

The Data Controller is Unione Italiana Vini Servizi soc. coop – in the person of the pro tempore legal representative Paolo Castelletti. The data controller can be found at the addresses listed above. The updated list of data processors and persons in charge of processing is kept at the Data Controller's head offices.

#### 12) Data Protection Officer

The Data Protection Officer (DPO) is not applicable to our organisation.

#### 13) Changes to this privacy policy

This Privacy Policy may be subject to changes. We therefore recommend you regularly check this Policy and refer to the latest version.

#### 14) LIST OF INSTITUTIONAL PARTNERS - ENOVITIS:

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**EXPRESSION OF CONSENT OF THE INTERESTED PARTY TO THE EXHIBITOR INFORMATION**

I, the undersigned \_\_\_\_\_ with Tax Code \_\_\_\_\_  
 in his/her capacity as \_\_\_\_\_ of the company \_\_\_\_\_  
 VAT no. \_\_\_\_\_ of which I have the responsibility for the data provided regarding the data subjects  
 whom you will know during our contractual and/operational relations:

**WHEREAS**

- I hereby declare that I have received the full information pursuant to Art. 13 of the regulation UE / 679/16, having understood the necessity for treatment within the limits, for the purposes and for the duration specified and in any case in compliance with the Reg. UE / 679/16 and of the Legislative Decree 196/03;
- I will be able to exercise all the rights referred to in articles 16 and 17 of the GDPR 679/2016 (including the rights of access, rectification, updating, opposition to the processing and cancellation and the right to be forgotten);
- the information contains the methods of contact with the data controller and how to exercise the rights for the data subjects;
- all authorisations issued by all the undersigned can be revoked at any time by writing to the addresses indicated in this information sheet and said revocation will take effect by the third working day following the date of receipt of the registered letter.

Having considered all of the above

Purpose	Description	Consent
2.a	Data necessary to provide the services and/or products requested by the data subject from our organisation. Data necessary to complete the services requested including their management in terms of taxes, administration and organisation. For sourcing and sending out communications referring to the services requested. Specific data processing for the services requested falling within the cases referred to in Article 9 paragraph 2 from letter "b" to "j". For legitimate interest related to communications (including commercial communications) updating the initiatives of our organisation and/or deriving from applicable regulatory/legislative requirements.	Deriving from a specific legal basis
2.b.1	Data processing to improve services not necessary for carrying out the operations indicated in point 2 A), but aimed at improving the services requested, and in any case always obtained directly from the data subject. Requirements for the development of the processes and services required by the management systems and organisational models implemented, but not compulsory and not related to specific standards. The data will be used to speed up subsequent requests for services from our organisation before, during and after the trade fairs.	<input type="checkbox"/> I agree <input type="checkbox"/> I do not agree Without your consent, it might not be possible to provide the services requested
2.b.2	Marketing and/or commercial purposes: sending commercial communications and/or advertising material on UIV products or services, including trade fairs organised by the UIV and commercial communications/promotional material on products or services that do not fall within the legitimate interests (such as the Corriere Vinicolo di Unione Italiana Vini newsletters). This will be done using both automated contact methods (email, SMS, mms, whatsapp, fax, newsletter) and traditional methods (paper mail). Please note that if you have already been an Exhibitor with us, we may send you commercial communications relating to services and products that are similar to those you have already used, unless you indicate otherwise (Privacy Code).	<input type="checkbox"/> I agree <input type="checkbox"/> I do not agree
2.b.3	Use of audio-video recordings and photographs: their vision and duplication, where the data subjects are filmed, exclusively for the activities and services requested from our organisation (such as participation as auditors or speakers in all possible exhibition activities: Conferences, Workshops, press conferences, work tables, digital and/or in-person forums, Webinars, training courses) and/or for promotional activities of the same (such as publication on our website or on our social networks) and not for other commercial purposes. It is specified that in the case of participation in digital call-conferences, data subjects will be free to use their own audio-video devices and configuration data as they wish (so they can even choose to disable them or change their account name to remain anonymous). This data may be used free of charge (pursuant to Articles 10 and 320 of the Italian Civil Code and Articles 96 and 97, law 22.4.1941, no. 633, Copyright Law). In other cases of use of audio-video recordings, a specific disclaimer will be required.	<input type="checkbox"/> I agree <input type="checkbox"/> I do not agree Without your consent, it might not be possible to provide the services requested
2.b.4	Marketing and/or commercial purposes of partners: sending commercial communications and/or advertising material on products or services of the partners who have organised the trade fair for which you have signed up as an Exhibitor.	<input type="checkbox"/> I agree <input type="checkbox"/> I do not agree

Date ..... Stamp and legible signature .....