

PRIVACY INFORMATION

In compliance with the provisions of Regulation (EU) 2016/679 (hereinafter the **GDPR**) and the **Data Protection Code** (i.e. Italian Legislative Decree 196/03 as amended by Italian Legislative Decree 101/2018), we wish to inform you that your data will be processed by the company Anci Servizi s.r.l. a sole shareholder company with registered offices in Milan in Via Alberto Riva Villasanta 3.

Pursuant to article 4, paragraph 1, no. 7 and 24 of the GDPR, we wish to inform you that the sole shareholder company Anci servizi s.r.l. is the **Data Controller** (hereinafter simply Anci or the Controller); to contact us, simply send an email to info@assocalzaturifici.it or call +39 02438291.

The Controller has appointed Mrs. Laura Marretta as its Data Protection Officer (**DPO**), and she may be contacted either by writing to the email address privacy@assocalzaturifici.it or by phone at the above company number.

As required by article 12 of the GDPR, the Controller has adopted the **Privacy Policy** hereinbelow as a means of providing the data subject with the information referred to in article 13 of the GDPR and any communication under articles 15 to 22 and 34 of the GDPR relating to the processing of personal data supplied when registering to take part in the trade fair as an exhibitor.

Therefore, in relation to the above, the Controller hereby informs the exhibitor that all Personal data not belonging to the special categories of personal data listed in art. 9 of the GDPR and freely provided to the Controller when filling in the online application form for the MICAM Milano trade fair event, concerning the exhibitor himself/herself (including if operating as a sole trader, small business owner or professional) or, where the exhibitor is entitled to handle said data, regarding their employees, agents, representatives, co-workers or co-exhibitors (hereinafter simply the "Data"), shall be processed, as required by the GDPR and the Data Protection Code, in accordance with the **principles relating to the processing of personal data** described in article 5 of the GDPR, namely the principles of fairness, relevance, transparency, adequacy, protection of confidentiality and rights, etc. Data are processed in line with the **principles of lawfulness** provided for under article 6 of the GDPR for purposes relating to the relationship established with the Controller.

The Controller hereby informs the data subject that information provided on the Form in required fields (with asterisk) will be processed for the following purposes: organisation, storage, consultation, entry of data in the Database ("DB") or CRM system, stand assignment, service communications relating to the stages before, during and after the trade fair, taking out insurance, entry onto the platform for using the mandatory services provided through the digital platform "Fiera Milano Platform"- Portale espositore (services provided solely by Fiera Milano S.p.A. in agreement with the Controller), processing, compilation of statistics that will remain anonymous, extraction, processing in EU and non-EU territories only in the cases under articles 45 and 46 of the GDPR, editing, deletion, communication to appointed Processors under art. 28 of the GDPR for accounting and administrative organisational reasons.

Said data are required in order to take part in the trade fair, to activate fair services and entry passes, and in order to be placed in the correct pavilion during the event.

The legal basis for processing data is the compilation of the Application form - the contract - in order to exhibit at the trade fair (**legal basis: pursuant to article 6, paragraph 1, point (b) of the GDPR**).

Moreover, the Controller hereby informs the data subject that the exhibitor participation form also contains a section in which non-mandatory data is collected. Although it is not strictly necessary to fill in this information to obtain accreditation for the event, it is extremely useful for Anci. Said data is required for reasons of legitimate interest on the part of the Controller (**lawful basis** for processing pursuant to **article 6, paragraph 1, point (f) of the GDPR**), which corresponds with the legitimate interest of the exhibitor, who, by providing said data, will have an event that meets its legitimate expectations and is more geared to their interests, will be allocated a position within the pavilions that is better suited to their specific products, and will be more easily identified in the paper catalog of the exhibitors - available in the fairgrounds - and in the Online catalog, which will give them better exposure. The Controller hereby informs you that any additional Data collected mainly concern **company business** and not directly the exhibitor as an individual; unless you object - simply by sending an email to themicam@pec.it or info@themicam.com with "objection" in the subject line, following which you will be contacted by our offices, which will carry out your request - the following processing operations will be conducted on these data, in addition to those already indicated as necessary in order to be accredited as an exhibitor: processing operations for stand assignment by product and display category type, service communications, customer satisfaction operations and sector surveys, publication of data provided in both the printed and online trade fair catalogue and on the online map of the pavilions, which will be available for consultation at www.themicam.com (Online catalog, see points 9 and 25 of the General regulations for the exhibition), inclusion of your name and/or the name of your product in journalistic and trade articles, communication of data to Processors appointed by the Controller under art. 28 GDPR in order to provide you with a dynamic trade fair that is increasingly geared to your interests.

The Controller may also send you **soft spam** (in accordance with art. 130 par. 4 of the Data Protection Code) which you may refuse to receive at any time by following the instructions contained in the email footer or by writing to us at info@themicam.com.

Unless you withhold your consent, the Controller will use the Data entered by you in the "Data for the catalogue" area to also enter you on the **Matchmaking** platform. If you wish to refuse, you can do so by checking the "NO" box that refers to the Matchmaking service.

The Data Controller also, in accordance with art. 21 GDPR and recital 47 GDPR, by virtue of its own legitimate interest (legal basis legitimating the processing ex art. 6 paragraph 1 lett. f GDPR) balanced with the reasonable expectations and interests nurtured by the subject will send its own **marketing** communications of interest to the exhibitors' business, including initiatives both physical and digital carried out in coordination with Assocalzaturifici and other companies in commercial partnership (through webmarketing, telephone contacts, DEM, mms, sms, e-mail, fax, paper mail, carried out by the Data Controller and/or third party companies appointed as processors).

In order to provide the data subject with further protection with regard to this specific processing and in compliance of the principles of accountability and transparency, the following address - **opposizionemkt@themicam.com** - is placed at your disposal, to which you may write to specifically indicate that you do not wish to receive this type of marketing communication, putting "NO MKT" in the subject line.

It is understood that the data subject shall also have the right to object at any time to marketing communications by following the instructions in the footer of any emails that he/she receives.

The Controller shall perform the processing operations set out below, only on receipt of express consent (**legal basis**: consent given under article 6, paragraph 1, point (a) of the GDPR) to be provided explicitly for the purposes of:

A) promotional material regarding the activity of its exhibitors, associates or companies connected with the Event, being sent to the Exhibitor by the Controller or his appointed Processors (pursuant to art. 28 GDPR), by means of both traditional and contemporary marketing methods: web marketing, telemarketing, DEM, text messages, e-mail, paper mail without the exhibitor's personal data being communicated to the former.

B) communication of the Exhibitor's data to other exhibitors, associates or business partners which, as autonomous data Controllers, may send you promotional material relating to the fashion and footwear world by means of both traditional and contemporary marketing systems: web marketing, telemarketing, DEM, text message, email, paper mail.

C) profiling, in order to be able to send the Exhibitor communications geared to his interests.

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal (art. 7 of the GDPR). In order to exercise the right of revoke, please read what is expressed in the point: Rights of the Data subject.

In relation to the Transfer of data to non-EU territories, the Controller hereby informs you that the data you provide may also be transferred to non-EU countries in compliance with the provisions of Chapter V of the GDPR.

Communication and Dissemination of Data: the Data provided by you in order to participate in the event will not be disseminated by the Controller.

In order to offer an efficient, comprehensive and well-structured trade fair service and therefore meet the needs of the exhibitor, the Controller has formed a business partnership with Fiera Milano S.p.A. (which is in turn supported by the Fiera Milano Group). Therefore, some of the data you provide will be communicated to Fiera Milano S.p.A., which will act as the Processor appointed by the Controller to provide certain essential services relating to organisation, accounting and administration. In other cases, in which Fiera Milano S.p.A. acts as Controller, you may provide your personal data to Fiera Milano S.p.A. yourself, by interfacing with various kinds of Applications (APPS) and/or services (some specific areas on the Fiera Milano digital platform) provided solely by Fiera Milano S.p.A. (in relation to this, please refer to the specific privacy policies produced by Fiera Milano S.p.A.), it also being in the interests of Anci to improve the organisation of the trade fair event.

For further details on the actions of Fiera Milano S.p.A. and the Group as Controller, we refer you to the notifications regarding specific services provided by same.

Your data will also be **communicated to** Assocalzaturifici, ITA, Institutions and third-party companies duly appointed as processors under article 28 of the GDPR, for administrative, accounting and/or organisational purposes, for the drafting of both a paper catalogue (available at the fair) and an online version (which can be consulted at www.themicam.com), for the drafting of both a paper map of the pavilions (available at the fair) and an online version (which can be consulted at www.themicam.com). Your data will also be communicated to other companies for the organisation of conferences, prize-giving ceremonies and events held during the exhibition, for communication to workers for the drafting of promotional and/or trade journalistic articles relating to the fair, as well as for communication to third parties appointed by the Controller to promote the exhibition. In any case, data processing shall always concern management of the trade fair activity.

The Controller on its own or through the company Edizioni AF S.r.L. (with headquarters in Milan, Via Ippolito Nievo n. 33) company appointed as Data Processor, will collect directly from the exhibitor, through dedicated forms and, if necessary, also by means of Edizioni AF that will have direct contact with the exhibitor, some data in order to initiate the provision of advertising - billboards and digital media and advertising in the Visitor's guide (billboard Circuit

advertising and Digital as specified in Articles. 22 and 23 C Regulation). The data collected will be processed to implement the supply required by the exhibitor who will have purchased the service (legal basis: Article 6 paragraph 1 letter. b GDPR) and stored for 10 years for administrative / accounting purposes.

The Data Controller will also process the name of the person indicated in art. 5 of the Regulations (safety at work) for purposes related to the article itself and will communicate this data to Fiera Milano S.p.A.

Data may be processed using either paper or electronic means, by individuals specifically authorised to process the information, as required by article 13, paragraph 2, point (f) of the GDPR.

The Data Controller confirms that **the Processing does not take place through an automated decision-making process** and the same profiling, carried out only after consent, does not produce effects based solely on it.

The Controller observes appropriate security measures as required by art 32 GDPR to prevent data loss, illegal or incorrect use and unauthorized access.

Providing your Data is partly optional; in fact, refusal by the exhibitor even to provide data that does not require specific consent, but that is needed for performance of the contract and to enable accreditation as exhibitor, would make it impossible to continue the relationship and would therefore affect your ability to participate in the trade fair.

Please note that, by filling in the Application Link and sending the signed contract, you are in effect authorising Controller to process data for the performance of the contract. Furthermore, exercising the right to object or failing to provide consent for data processing as set out in points A, B, C and, while enabling the Exhibitor to participate in the trade fair, will prevent the Controller from sending him/her information regarding certain events and services promoted during and after the exhibition, which consequently will not be provided.

Retention Period: as required by art. 13 paragraph 2 letter. a GDPR we inform the exhibitor that the Data will be stored for 10 years for administrative accounting purposes, while for other purposes it will be stored no longer than 6 editions of the fair.

Rights of the Data subject

The Controller also informs you that the following rights are guaranteed under article 13, paragraph 2 of the GDPR:

1. the right of access to personal data and to related information as listed under article 15 of the European Regulation;
2. the right to correct or delete the data supplied or request limitation of data processing;
3. the right to object to data processing;
4. the right to data portability;
5. the right to revoke your consent at any time without affecting the lawfulness of data processing on the basis of consent given prior to revocation, where processing is based on article 6, paragraph 1 point (a), or article 9, paragraph 2 point (a) of the GDPR;
6. the rights under article 21 of the GDPR, including, therefore, the right to object at any time, for reasons connected with your particular situation;

7. make a complaint to a supervisory authority;

To exercise the rights listed above (items 1 to 5) or for more information on the processing of your data, simply send an email to our DPO at the following email address: privacy@assocalzaturifici.it, stating the wording "Exercising of rights under the GDPR" in the subject line and specifying the right that you wish to exercise in the body of the e-mail, along with your name, surname and the email address where you wish to receive the reply. Once your request has been processed, the Controller will send its feedback in the terms set forth in article 12 point (3), of the GDPR.

To exercise your rights under item 6, we invite you to consult the text of the privacy policy (cf. the 'right to object'), and with regard to item 7, we invite you to visit the site of the Data Protection Authority where you can find all the information on the right to lodge a complaint.

The Controller informs you that the rights listed in and guaranteed by articles 15-22 of the GDPR may not be exercised by submitting a request to the Controller or by lodging a complaint under article 77 of the GDPR if exercising same could cause real, concrete injury to certain data categories and/or to certain activities listed under article 2-undecies of Leg. Decree 196/03, as amended by Leg. Decree 101/2018; this does not prejudice the provisions, specified in paragraphs 2 and 3 of the aforementioned article, in terms of limitations, exclusions or delays in exercising rights.

Should the Controller intend to process personal data for a purpose other than that for which it was collected, the data subject will be provided in advance with information on this new purpose and all other pertinent information, and the Controller will seek his or her prior consent.

Data breach: in the event that the Controller suffers a violation as configured in art. 33/34 involving a risk to the rights and freedoms of individuals (data breach), the Controller will act - if necessary - to notify the Authority and the communication of the incident to all data subjects.

Responsibility

The Controller also informs the Exhibitor that the single-member company Anci and Fiera Milano S.p.A shall not be held jointly liable for any complaints or, in any case, liable in relation to the data subject or third parties with regard to personal Data processing. Instead, each shall be directly and solely liable for problems arising in relation to the services they have provided, as well as only for the services for which they are respectively competent (holding themselves mutually harmless from both direct and indirect damage), see art. 32 of the Exhibition Regulations. The Exhibitor may therefore contact Fiera Milano S.p.A directly (www.fieramilano.it), registered address in piazzale Carlo Magno 1, 20149 Milano; operational and administrative headquarters in S.S. del Sempione 28, 20017 Rho, VAT No. 13194800150.

It is understood that the exhibitor shall also be liable for the accuracy and truthfulness of the data required when filling in the entire application dossier; moreover, if the exhibitor provides third-party data (e.g. data relating to: Co-exhibitors, the Company represented, representatives, agents, employees or collaborators), he/she shall be held liable for both the accuracy and truthfulness of the data and for communication of the same, and shall guarantee that these Data can be lawfully used by the Controller. The exhibitor shall also indemnify the Controller against any claims which may arise, also holding it harmless from all direct and/or indirect claims for damages.