



## Information on the Processing of Personal Data, pursuant to Article 13 of EU Regulation No. 2016/679 "GENERAL DATA PROTECTION REGULATION" (hereinafter "GDPR"), and Legislative Decree 196/2003 as amended by Legislative Decree 101/2018

With this information notice, we wish to inform you about how our Company, ROSORETTO S.S.A. (hereinafter the Company or ROSORETTO), processes the identifying and contact personal data collected from you during your participation in an event organized by ROSORETTO or attended by ROSORETTO, or through standard communication channels. This notice is published on the ROSORETTO.com website under the Privacy Policy section. Unless otherwise specified, all legal references in this document pertain to the GDPR.

### 1. Data Controller

The Data Controller is ROSORETTO S.S.A., with VAT No. IT03340090046 and registered office at Via Alba Monforte 76, Castiglione Falletto (12060 - CN).

### 2. DPO Appointment

The Controller, not falling within the cases indicated in Article 37, nor in those specified in various interpretations by the Supervisory Authority, has not deemed it necessary to appoint a Data Protection Officer.

### 3. Subject of Processing

The processing concerns the data that ROSORETTO uses to manage direct communications with you or, if collected during an event, to organize the event effectively and provide you with the best possible service. Depending on the case, these may include:

1. **Personal data (Name, Surname) and contact details (email address, phone number). These data are always collected.**
2. Logistical data necessary to manage schedules, shuttles, flights, hotel rooms, etc. (e.g., departure location for the event, arrival time).
3. A copy of your identification document, if ROSORETTO needs it for booking flights or hotels.
4. Clothing size, if event-related clothing is provided.
5. Information about food intolerances, allergies, or dietary restrictions, if meals are provided.
6. **Photographs and audio/video recordings of your person during the event (limited to those taken under ROSORETTO's responsibility).**
7. Data included in the feedback you may provide at the end of the event.

**IT IS IMPORTANT TO NOTE THAT NOT ALL DATA IS NECESSARILY COLLECTED AT ALL EVENTS. GENERALLY, ONLY THE DATA IN POINT 1 IS ALWAYS COLLECTED, WHILE ONLY THE DATA IN POINT 6 IS PROCESSED AT EVERY ORGANIZED EVENT. THE OTHER DATA CATEGORIES ARE OCCASIONAL. IT IS ALSO POSSIBLE THAT SUCH DATA IS COLLECTED AND PROCESSED BY THIRD PARTIES, SUCH AS EVENT ORGANIZING COMPANIES OR PR AGENCIES, ACTING AS INDEPENDENT DATA CONTROLLERS.**

### 4. Purpose of Processing, Legal Basis, Nature of Data Provision

**Personal data under point 3.1 is acquired through:**

- Your business card (whether personal or as a company representative).
- Contact with our sales personnel.
- Requests for information through the website.
- Publicly available online directories where you have voluntarily provided your information for business contact purposes.
- Attendee lists from events where ROSORETTO has participated, containing your data only if you have consented to this processing with the respective event organizer.
- Registration lists and forms compiled at ROSORETTO-organized events, such as workshops, training activities, corporate courses, forums, seminars, tastings, and visits.

The processing of this data is aimed at responding to any requests from the data subject. In this case, processing is lawful under Article 6(1)(b) of the GDPR. These data may also be used for direct marketing activities, which do not require explicit consent as they fall under the legitimate interest of the controller (Article 6(1)(f)). **These data WILL NOT BE USED FOR GENERIC MARKETING ACTIVITIES.**

**For event participation, personal data under points 3.2, 3.3, and 3.4** is collected only to facilitate your participation. If an event registration form is used, it will specify which data is mandatory and which is optional. If mandatory data is not provided, participation will not be possible.

Your email address may be collected and used to send you a feedback request (point 3.7). This request may include an authorization to contact you for promotional purposes. In this case, your explicit consent will be required, in accordance with Article 6(1)(a) of the GDPR.

**Personal data under point 3.5** is acquired solely to be communicated (in aggregated and anonymized form) to the event's food service provider (catering, restaurant, etc.), allowing them to accommodate dietary needs. Since this is sensitive data, processing is lawful under Article 9(2)(a) and requires your explicit consent. If consent is not provided or the information is missing/inaccurate, dietary needs cannot be accommodated, and ROSORETTO cannot be held responsible for any resulting food-related harm.

**Personal data under point 3.6** is collected for internal documentation and promotional purposes related to the event and ROSORETTO itself.

For public events or those with a large number of attendees, processing is legitimate under Article 6(1)(f) and is permitted by Articles 96 and 97 of the Copyright Law. For private events with a limited number of participants, processing is lawful under Article 6(1)(a) and requires your explicit consent, obtained through a signed release before or at the start of the event. If consent is denied, rosoretto will exclude you from close-up photos and videos where you are recognizable, but this does not apply to panoramic images where you are not identifiable. **ROSORETTO DECLINES ALL RESPONSIBILITY FOR PHOTOS AND RECORDINGS TAKEN INDEPENDENTLY BY THIRD PARTIES (E.G., COLLEAGUES USING SMARTPHONES OR OTHER COMPANIES ATTENDING THE SAME EVENT).**



**Personal data under point 3.7** is acquired for internal purposes, statistical analysis, and service improvement. If used as a reference for institutional and promotional communication, it will be processed under Article 6(1)(a) and requires explicit consent.

## 5. Processing Methods, Data Retention Period

Personal data under points 3.1 to 3.5 is collected electronically through an online form managed by Google and is deleted after the event.

Data under point 3.6 is processed electronically and stored on ROSORETTO's servers for HR and Marketing use. The retention period varies according to the needs of the departments using the data.

Data under point 3.7 is collected in paper form, digitized, and stored for five years. After this period, it is reassessed and either deleted if obsolete or retained for another five years.

## 6. Access to Data

Your data may be accessed by ROSORETTO employees and collaborators authorized for processing, as well as third-party service providers acting as external processors. ROSORETTO carefully selects these entities based on their adherence to strict security and confidentiality policies.

## 7. Data Communication

Without explicit consent (Article 6(1)(b), (c) GDPR), the Controller may communicate your data to supervisory bodies, judicial authorities, and other legally mandated entities. These subjects will process the data as independent controllers.

**YOUR DATA WILL NOT BE DISCLOSED, EXCEPT FOR AUDIO/VIDEO MATERIAL, WHICH MAY BE USED FOR MARKETING AND COMMUNICATION PURPOSES, INCLUDING SOCIAL MEDIA.**

## 8. Data Transfer

Personal data is stored electronically on local PCs or Cloud services within the EU. If necessary, ROSORETTO may transfer storage locations within or outside the EU. Such transfers will comply with legal requirements, ensuring security and data protection.

## 9. Data Subject Rights

Data subjects have the rights under Articles 15 to 22 of the GDPR, including access, rectification, erasure, restriction, notification, portability, objection, and rights related to automated decision-making.



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## 10. How to Exercise Your Rights

Requests can be sent via:

- Registered mail to the Data Controller.
- Email to [info@rosoretto.com](mailto:info@rosoretto.com).

*ROSORETTO S.S.A.*