

# INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR PARTICIPANTS TO EVENTS

**AIM Italy S.r.l.** (hence, the “Controller” or “AIM”), in its quality of Data Processing Controller, as per section 13 of the EU Regulation n. 679/2016 (hence, the “Data Protection Regulation”), and subsequent modifications and integrations, collects and subsequently processes personal data<sup>1</sup> of the participants (hence, the “Data Subject”) – including as teachers or learner – to the congress and/or other scientific or training event (hence, the “Event”), also held remotely.

The contact details of the Data Protection Officer (as per section 37 of the Data Protection Regulation) designated by AIM can be found at the following link <https://www.aimgroupinternational.com/company-information>.

## 1. Scopes and ways of processing.

The personal data of Data Subjects are processed in the context of AIM’s commercial activity, for the following scopes:

1. subscription and participation to the Event;
2. fiscal, administrative and accounting duties strictly connected to above participation;
3. execution of specific duties prescribed by law, regulation or EU norms (such as administration of credits for Continuing Medical Education);
4. distribution free of charge of documentation relating to the Event;
5. use the Data Subject image and/or voice, portrayed during the Event or uploaded by the same, within videos, audio and/or photographs of the Event itself, published on the AIM Group website and social networks, if any, or on the Event’s website and social networks, as well as on the Event’s digital platform (if any);
6. receipt of documentation from AIM in order to be updated on all its projects, initiatives and events, both by means of automated tools (such as newsletters, e-mails, SMS, MMS, robocalls, ecc.) and by means of traditional tools (hardcopy mail and/or operator calls) in the same area of interest;
7. with prior express consent of the Data Subject, receipt of documentation from all the other companies included into the AIM Group International, in order to be updated on all their projects, initiatives and events, both by means of automated tools (such as newsletters, e-mails, SMS, MMS, robocalls, ecc.) and by means of traditional tools (hardcopy mail and/or operator calls).

The processing of the personal data is executed, under authority of the Controller, by entities specifically Designated, authorized and instructed for the processing as per section 2-*quaterdecies* of Italian Law Decree n. 196 dated June 30, 2003, as amended by Italian Law Decree n. 101 dated August 10, 2018 (hence, the “Privacy Law”) and as per sections 29 of the Data Protection Regulation, by means of manual, automated or telecom tools, with logics strictly connected to the scopes and in any case in such a way as to guarantee confidentiality and security of the personal data.

## 2. Juridical basis for processing, nature of transfer and consequences of denial, consent by Data Subject.

With reference to the scopes listed at preceding section 1, items 1., 4., 5. and 6, transfer of the personal data is mandatory and represents a necessary condition to the subscription and subsequent participation to the Event and receipt of documentation from AIM about future projects, initiatives and events in the same area of interest; indeed, failure to transfer will determine impossibility of subscribing the Data Subject to the Event and of involving him/her in any initiative of the Event or other AIM’s future projects, initiatives and events of the same area of interest; thus, the juridical base of the related processing is the full participation to the Event and the next update on AIM’s future projects, initiatives and events of the same area of interest, as per section 6, paragraph 1, letter b) of the Data Protection Regulation. Instead, with reference to the scope listed at preceding section 1, item 7., transfer of the personal data is optional, indeed the lack of consent will determine impossibility for the Data Subject to receive from all the other companies included into the AIM Group International information about projects, initiatives and events promoted by them. Thus, the juridical base of the related processing is the express consent of the Data Subject, as per section 6, paragraph 1, letter a) of the Data Protection Regulation. Finally, with reference to the scopes listed at preceding section 1, items 2. and 3., transfer of the personal data is mandatory and the legal basis of the processing is the fulfilment of legal obligations of the Data Controller, as per section 6, paragraph 1, letter c) of the Data Protection Regulation.

## 3. Entities and categories of entities to which the personal data may be communicated and context of communication.

With regards to the scopes of the processing as indicated above, and within the strict boundaries of pertinence to these scopes, the personal data of the Data Subject will be communicated in Italy, in the European Union or beyond the European Union, to the following entities, for the scope of subscription and subsequent participation to the Event:

- (i) to fiscal Authorities and other public Authorities, where mandatory by law or upon their request;
- (ii) to financial institutions for the execution of payments related to the subscription;
- (iii) to the structures and/or external companies that AIM uses for the scope of executing connected activities, instrumental or consequent to subscription and subsequent participation to the Event (such as press services, data processing and IT consultancies, promotional activities by companies participating to the Event, mailing of the event’s program, credits for Continuing Medical Education, hotel reservations etc.);
- (iv) to external consultants (e.g. for management of fiscal duties) if not designated Processors in writing;
- (v) taking into account the fact that AIM is part of an international Group: to controlling, controlled or connected companies, for administrative and accounting scopes;
- (vi) with prior express consent of the Data Subject, to the other companies included into the AIM Group International, due to be updated on projects, initiatives and events promoted by said subjects.

Above entities, to whom the personal data of the Data Subject will be or may be communicated (insofar as not being designated Processors), will treat the personal data as Controllers according to the Data Protection Regulation, in full autonomy, being completely separated from the original processing executed by AIM.

Without the consent to communication of the personal data and to related processing, in those cases where it is foreseen as by Data Protection Regulation, the operations which require the communication might not be executed, with consequences known to the Data Subject.

A detailed and constantly updated list of these entities, including their respective offices, is always available at AIM’s legal offices.

In the event of publication of images, videos and/or photographs of the Data Subject, specific information will be issued from time to time and specific release and consent will be requested.

As mentioned, however, the image of the Data Subject, sent/uploaded by the same, may be published on the digital platform of the Event (if any).

Should the personal data of the Data Subject be transferred to countries outside the EU for the pursuit of the aforementioned purposes, such transfer will only take place against the existence of international agreements or adequacy decisions by the Commission (pursuant to Article 45 of the Privacy Regulation) or agreements containing the so-called “standard contractual clauses” (pursuant to Article 46 of the Privacy Regulation and pursuant to

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<sup>1</sup> As per section 4 of the Data Protection Regulation, “personal data” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR PARTICIPANTS TO EVENTS

EU Commission Decision no. 2021/914 of 4 June 2021) or in the presence of binding corporate rules (pursuant to Article 47 of the Privacy Regulation), and in any case on the basis of appropriate safeguards ensuring that personal data is adequately protected in accordance with the principles of the Privacy Regulation. In the absence of an adequacy decision pursuant to Article 45(3) of the Privacy Regulation or of adequate safeguards pursuant to Article 46 (standard contractual clauses) or Article 47 (binding corporate rules), the transfer of personal data to a third country outside the EU may only take place if one of the conditions set out in Article 49 of the Privacy Regulation is met.

### 4. Rights of the Data Subject.

Sections 15 and following of the Data Protection Regulation grant the Data Subject the right to obtain:

- confirmation or denial of existence of personal data related to the Data Subject, even if not yet registered and their communication in an understandable format;
- indication of the origin of the personal data, of their scopes and of their ways of processing, of the logic applied in case of processing by means of electronic tools and of the identifying details of the Controller;
- update, rectification, integration, cancellation, transformation into anonymous data or blocking of data treated in violation of the law – including data for which conservation is not necessary for the scopes for which they were collected and subsequently processed. Documentation of these operations, also pertaining to their content, is brought to the attention of the Data Subjects whose data have been communicated or published, except for the case in which this duty is impossible to perform or requires the use of tools which are obviously disproportionate in relationship to the granted right.

Moreover, the Data Subject has the right to:

- withdraw consent (if given) to the processing of personal data at any time (without prejudice to the lawfulness of the processing based on the consent given before the withdrawal);
- oppose, partially or completely, for legitimate reasons, to processing of his/her personal data, even if coherent with the scope of collection;
- propose a complaint to the Data Protection Authority as foreseen by the Data Protection Regulation.

In order to know the detailed and constantly updated list of the entities to whom personal data of the Data Subject may be communicated and to exercise the rights granted by sections 15 and following of the Data Protection Regulation, in accordance with section 12 of Data Protection Regulation and within the limits of section 2-*undecies* of the Privacy Law, the Data Subject may contact the Data Processing Controller at the following addresses:

### AIM Italy S.r.l.

Viale Enrico Forlanini n. 23 - 20134 Milan - Italy

Phone: +39 02 56601.1 - Email: [info.aimcongress@aimgroup.eu](mailto:info.aimcongress@aimgroup.eu)

### 5. Duration of the processing.

Except for legal obligations, the personal data of the Data Subjects will be conserved only for the Event's duration. Instead, regarding Data Subject's the updates on projects, initiatives and events promoted by AIM and (with prior express consent of the Data Subject) by all the other companies included into the AIM Group International, the processing will not have a duration exceeding 5 years from the date of the provision of the update service from them, as long as the Data Subject has not requested cancellation before. Notwithstanding the above, AIM may conserve some personal data of the Data Subject also after the termination of processing, exclusively for the scope of defending or safeguarding its rights, or in those cases as defined by law or by order of a judicial or government authority.