

**PRIVACY DISCLOSURE**  
**Pursuant to Article 13 of EU Regulation No. 679/2016**

COIMA SGR S.p.A (“**COIMA**” or the “**Company**”) in its capacity as Data controller, hereby informs you that the processing of the personal data provided to the company or collected by the same at the time of participation in the event requested and relating to an on-line conference in streaming to be achieved on the Sfeera S.r.l. webinar platform (the “Event”) will be processed as described below.

**Purpose of the processing and legal basis**

Personal data (including name, surname, email and/or telephone number, job title) may be processed for the following purposes:

**1. Execution of the requested Event**

Handling of the registration of the Event requested (e.g. webinar, etc.) by means of the compilation of a specific form as well as permitting the Company to execute all the activities essential or associated with the performance and the correct execution of the event, including therein the sending of communications/notifications to the participants via SMS or e-mail channels (e.g. reminder of the event, material publications, handling of interaction with speakers via chat, response to questions asked during the Event and not dealt with, etc.).

The legal basis for the purposes illustrated is the performance of the service requested by the participant, in other words participation in the Event, and therefore does not require specific consent.

**2. Marketing Purposes**

Sending communications relating to events or programmes organised, participated in or sponsored by our Company or third party business partners. Please note that no communication of data will be made to the Company's business partners for the marketing purposes indicated. In order to send you these communications, we need your consent, which is the legal basis that allows us to process your data and which you can revoke at any time if you no longer wish to receive our communications and invitations to our events. Failure to give consent for information and marketing activities will not affect your participation in the Event.

**3. Pursuit of the legitimate interests of the Company and/or third parties**

The participant's personal data may be used for the purpose of pursuing the right of defence in court, where necessary for the correct invoicing and charging of payments, for the handling of complaints and disputes, the possible recovery of debts in and out of court, the prevention of fraud and/or illegal activities;

**4. Statistics and analysis**

Aggregated and anonymous data, which do not permit direct identification, may be used for the performance of statistical analysis, to improve the services offered to users, to correct and develop research and analysis techniques.

The legal basis for the processing for the above purposes (No. 3 and 4) is the legitimate interest of the Company, and in the case of third parties, which according to the Controller's assessments do not prevail over the fundamental rights and liberties of the user and which represent the legal basis of the processing.

**5. Enforcement of legal obligations**, regulations, domestic and EU legislation as well as provisions imparted by authorities empowered to do so by law. For this processing, the legal basis is an obligation required by the applicable legislation.

**Methods and duration of processing**

The data will be processed electronically in compliance with current legislation and the principles of correctness, lawfulness, transparency and confidentiality. The personal data collected for the indicated purposes will be kept by COIMA for the time necessary to publicise and publish the Event as well as to provide feedback to the participants (e.g. sending materials

relating to the Event, answering any questions left unanswered during the Event, etc.) and, subsequently, will be kept by the Company for legal obligations (e.g. prescription, protection of rights or legitimate interests of the Company and/or third parties, archiving of material relating to the events organised).

#### **Nature of the conferral of personal data**

The conferral of data is entirely voluntary, however, your refusal to consent to the collation of your personal data, marked with an asterisk, will preclude the possibility of participating in the event in question. Information not marked with an asterisk (e.g. mobile phone number used to send the participant a reminder of the Event) is free and optional and failure to provide it will not affect participation in the Event but will lead to the impossibility of sending reminder text messages about the Event requested by the participant.

In conclusion, the provision of your data for marketing purposes is voluntary and any refusal to provide your consent will not preclude the possibility of participating in the Event, preventing you from being informed about future initiatives and events sponsored by the Company.

#### **Scope of data communication**

For the purposes described above, data may be disclosed to third parties whose activities Coima uses for the performance of said purposes. Said parties will act as Data Supervisors or autonomous Data Controllers, as well as Company personnel authorised to process data. The list of parties to whom the data will be communicated is available care of Coima, requesting the same from the contact individuals indicated below.

#### **Dissemination of personal data**

The service requested will be reproduced, divulged and published on various forms of media, including the Internet (e.g. the Company's website or specific platforms) and social networks (e.g. LinkedIn).

#### **Rights of the data subjects**

Where applicable, you may exercise the rights envisaged in Articles 15-22 of the Regulation (obtain confirmation of the existence of personal data, request the updating, rectification, cancellation, limitation of processing, portability of data) by sending a specific request to the Data Controller at the following email address [privacy@coima.com](mailto:privacy@coima.com).

You may also lodge a complaint with the Italian Data Protection Authority if you believe that the processing of your personal data has been carried out in violation of data protection legislation.

#### **Amendments and updates to the disclosure**

This disclosure was updated as of 29 June 2020. If updates are necessary, they will be made available to participants.