# Privacy notice on the processing of personal data: “Case studies”

## 1. Who is the data controller (who decides which data to process and how)?

The data controller, as defined in Article 4, para. 1, no. 7 of Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter referred to as the GDPR) is **Storti SpA**, with its registered office at Via Francesco Dioli, 11, 26045 Motta Baluffi (CR), Tax Code and VAT No. 00765230198, hereinafter referred to as “***Company***”.

In accordance with Art. 13 of the GDPR, the following information is provided regarding the processing of personal data.

## 2. Who are the data subjects (the recipients of this notice)?

The data subject is the natural person to whom the personal data being processed by the Company relate.

For the purposes of this notice, the data subject is any individual featured or involved in photographic and/or audiovisual content (images and video) produced for corporate case studies (the “**Participant**”).

## 3. What data are collected, and what are the purposes and legal bases for processing them (why are the data collected)?

Personal data (images and audio-video footage) captured at the client’s premises during the installation of the product supplied by the Company (for case study purposes) will be processed for marketing and promotional activities across all the Company’s web and social media channels, as well as for any processing required to comply with legal obligations.

In particular, the personal data, images and videos will be processed for the following purposes:

a) the publication of photographs in the Company’s photo gallery and possibly on other computer and paper media of the Company;
b) the publication of photographs and videos on the Company’s websites and on the Company’s dedicated social media channels, on the websites of third parties authorised by the Company and through any other means and form of communication to the public, including print media, mobile phones and/or other remote communication systems or technologies, useful for the promotion of the Company’s events, as well as through the communication media of partners linked to the Company’s initiatives.

The Company may therefore assess the production of audio/video material in which the Participant appears, to be used for information/promotional purposes both in printed (brochures, leaflets, flyers, catalogues, etc.) and digital (website, social channels, media, etc.) format.

The use of the images is subject to compliance with the relevant regulations in force and provided it does not violate the dignity, decorum and personality of the Participant.

The production and use of the images are to be regarded as being carried out entirely free of charge and nothing will be claimed or due as financial consideration.

The legal basis for the processing is the consent freely given by the Participant (Article 6.1 letter a).



## 4. Is the provision of data compulsory or optional?

The provision of personal data in relation to the processing referred to in point 3 above is to be regarded as optional for those purposes; consequently, any refusal will mean that the Company is unable to use and publish the material.

Should the filming be carried out in common areas, the Company undertakes to take measures to exclude the Participant from the filming.



## 5. Where are the data processed, how are they processed, and for how long?

The data collected are processed at the premises of the Company or at the premises of those authorised to process them.

The data collected shall be processed by electronic means or otherwise automated, computerised and telematic tools, or by means of manual processing with logic strictly related to the purposes which the personal data were collected for and, however, in such a way as to guarantee their security.

The data collected will be stored in the Company's records for purposes of documentation, promotional and institutional communication, with particular reference to the creation and dissemination of company case studies.

The data will be stored for a period of time, in any case, not exceeding the achievement of the purposes for which they are processed ("principle of storage limitation", art.5, EU Regulation 2016/679) and/or in compliance with the deadlines provided for by the regulations in force and legal obligations.

However, the Company applies rules that prevent the storage of data indefinitely and thus limits the storage time in compliance with the principle of minimising data processing.



## 6. Who is authorised to process the data, and to whom may they be disclosed?

The processing of the data collected is carried out by the Company's own personnel, identified for this purpose and authorised to process them in accordance with specific instructions given in compliance with the applicable regulations.

The data collected, to the extent pertinent to the indicated purposes of the processing and to the extent they are necessary for or instrumental to the performance of said purposes, may be processed by third parties appointed as data Processors, or, as the case may be, communicated to all subjects required for proper performance of the purposes under point 3.

Subject to the specific consent of the Participant, the images and video footage may also be disclosed and/or made available to third parties for further purposes consistent with the production and dissemination of the Company's case studies.

The data collected may be provided in the event of a legitimate request by the Judicial Authority, solely in the cases provided for by law.

Under no circumstances and for no reason whatsoever shall your data be disseminated.



## 7. Can the data being processed be transferred to countries outside the EU?

The data may be transferred abroad to non-EU countries, and in particular to the United States, only after verifying the Standard Contractual Clauses adopted/approved by the European Commission pursuant to Art. (c) and (d) of the GDPR or the binding corporate rules referred to in Article 47 of the GDPR or, failing that, pursuant to one of the derogations referred to in Article 49 of the GDPR.

Transfer to the United States is authorised under the specific agreement called the EU-US Data Privacy Framework (available here), so no further consent is required.



## 8. What are the rights of the Participant?

In relation to the personal data disclosed, the Participant is entitled to exercise the following rights:

a. (art.7.3 EU Regulation 679/2016 - GDPR) withdrawal of consent;
b. (art.15 EU Regulation 679/2016 - GDPR) access and obtain a copy;
c. (art.16 EU Regulation 679/2016 - GDPR) request rectification;
d. (art. 17 EU Regulation 679/2016 - GDPR) request erasure ('right to be forgotten');
e. (art. 18 EU Regulation 679/2016 - GDPR) obtain restriction of processing;
f. (art. 20 EU Regulation 679/2016 – GDPR) receive them in a structured, commonly used and

machine-readable format for the purposes of exercising the right to data portability;

g. (art. 21 EU Regulation 679/2016 - GDPR) object to the processing.

The Participant may exercise his/her rights, and request further information regarding his/her personal data, by sending an e-mail to privacy@storti.it specifying in the subject line the content of his/her request.

Requests relating to the exercise of the rights of the Participant will be dealt with without undue delay and, in any event, within one month of the request; only in cases of particular complexity or where there is a large number of requests may this deadline be extended by a further 2 (two) months.

We remind you that it is your right (ex. art. 77 EU Regulation 679/2016 - GDPR) to file a complaint with the Data Protection Authority, whose contact details are available here.

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