



Sisal S.p.A.
Via A. di Tocqueville, 13
20154 Milano
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INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR PARTICIPANTS IN THE GOBEYOND CONTEST

Last update and effective date: July 2021

Pursuant to articles 13 and 14 of Regulation (EU) 2016/679 (the “**Regulation**”), Sisal S.p.A., as data controller (the “**Data Controller**” or the “**Company**”), wishes to inform the participants in the Gobeyond contest (the “**Data Subjects**” and the “**Contest**”) about the purposes and methods of the processing of their personal data, the scope of the communication and the nature of their provision, as regards their participation in the Contest.

1. Data Controller

The Data Controller is Sisal S.p.A., a joint-stock company duly incorporated and existing under the laws of Italy, subject to direction and coordination of Sisal Group S.p.A. and having its registered office at Via Alessio di Tocqueville 13, Milano.

2. Data Protection Officer

The Data Controller appointed a data protection officer (“DPO”) who can be contacted at the following email address: dpo@sisal.it.

3. Source of the processed data

The personal data to be processed are acquired by the Data Controller directly and/or indirectly through third parties specifically appointed to do so, directly from the Data Subjects when they register for the Contest and from third parties (e.g., partners, in order to check whether the Data Subjects meet the eligibility criteria for participation in the Contest as set out in the call for ideas, or social media such as Google, in the event that the Data Subject uses the social login method made available by the Data Controller for registration and access to the Contest).

4. Purpose and legal basis of the processing

The Data Controller processes the personal data for the following purposes:

- a) To allow the Data Subjects to register and participate in the Contest and to properly manage the related activities: this processing of personal data is necessary to allow the Data Subjects to register and to participate in the Contest and to allow the Data Controller to correctly organise and manage the Contest and its related activities such as, for example, the identification of winners, the awarding of prizes). The legal basis of the processing is the performance of a contract to which the Data Subject is party (art. 6 par. 1 let. b) of the Regulation).
- b) To comply with the law and orders/instructions of public authorities and/or supervisory bodies: the processing of personal data is necessary to allow the Data Controller to comply with the law and/or orders/instructions of public authorities (e.g., public security authorities, judicial authorities) and/or supervisory bodies. The legal basis for the processing is the compliance with a legal obligation by the Data Controller (art. 6 par. 1 let. c) of the Regulation).
- c) To pursue the Data Controller’s legitimate interests related to checking whether the Data Subjects are eligible to participate in the Contest, monitoring and checking service quality (including the activities of sending the Data Subject, by the Data Controller, of any surveys aimed at investigating the degree of interest collected by the initiative or collecting evidence on the start-ups market, also for the purpose of developing the Contest), managing any disputes and exercising or defending its rights in or out of court. The legal basis for the processing is the pursuit of the Data Controller’s legitimate interests (art. 6 par. 1 let. f) of the Regulation).

5. Categories of personal data processed and processing methods

The personal data processed by the Data Controller are:

- anagraphic data (e.g., name and surname);
- contact details (e.g., email address)
- audio and video recordings (from the elevator pitch uploaded by the Data Subject) and photographs (for example if provided by the Data Subject or received from social media following the use, by the Data Subject, of the social login functionality made available by the Data Controller)
- payment data (e.g., IBAN to provide the possible funding);
- data about the relationships between the Data Subject and the Data Controller and/or the Data Controller’s partners (to check whether the Data Subject is eligible to participate in the Contest as set out in the call for ideas);
- any other data voluntarily communicated by the Data Subjects to the Data Controller in the context of their communications.



Sisal S.p.A

Società con unico azionista soggetta all'attività di direzione e coordinamento di Sisal Group S.p.A.
Capitale sociale: euro 125.822.467,22 i.v. - R.E.A. n. 1780722 (C.C.I.A.A. di Milano)
Codice fiscale, partita IVA e n.ro di iscrizione nel Registro delle Imprese di Milano - Sezione ordinaria: 04900570963
Sede legale: Via A. di Tocqueville n.13 - 20154 Milano - T.02.88681 - F.02.29000811 - sisal@legalmail.it

Dati per Fatturazione: Partita IVA del Gruppo IVA: 10541150966
Codice destinatario per Fatturazione Elettronica: A4707H7

Data Subjects who choose to use the social login offered by the Data Controller are informed that, in this case, the data relating to the Data Subject transmitted by the social media to the Data Controller concern name, surname, email address and profile photograph, in addition to the preferences of language.

The data is processed using manual and automated tools with logics strictly related to the above purposes and, moreover, in accordance with the precautions, guarantees and mandatory measures prescribed by the reference legislation, aimed at ensuring the confidentiality, integrity and availability of the data, as well as avoiding damages, either material or immaterial (e.g., loss of control of personal data or limitation of rights, discrimination, theft or usurpation of identity, financial loss, unauthorized decryption of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social damage).

6. Communication and dissemination

To pursue the above purposes, the Data Controller reserves the right to communicate the personal data to the following categories of recipients:

- public authorities and/or supervisory bodies (e.g., judicial authorities, public security authorities, etc.);
- other companies of the group to which the Data Controller belongs or its parents, subsidiaries or associates, as per article 2359 of the Italian Civil Code, based in Italy or abroad;
- partners involved in promoting, organising and managing the Contest with the Data Controller;
- managers of the web platforms where the participants' videos will be published;
- online and offline press agencies;
- parties that acquire, process and store data;
- parties that provide services for the Data Controller's IT system and TLC networks (including chat and email services);
- parties that store documentation and entry data;
- parties that provide assistance to the Data Subjects;
- professional firms or companies that provide advisory or consultancy services;
- parties that provide communication advisory or consultancy services;
- parties that check, audit and certify the Data Controller's business activities;
- parties that take over title to legal relationships from the Data Controller (e.g., transferees or potential transferees of goods, credits and/or contracts).

The parties included in the above categories operate as separate data controllers or as data processors specifically appointed by the Data Controller. The updated list of such third parties can be obtained by sending an email to privacy_sisal@legalmail.it. Personal data can also be processed by the Data Controller's employees authorised to process data and in line with their specific duties.

The Data Subjects' personal data will be disseminated within the limitations set out in the call for ideas (e.g., publication of videos on the web platforms of the Data Controller or third parties, communication of the winners' names to the online and offline press agencies).

7. Transfer of data outside the EU

The Data Controller informs that, to pursue the above purposes, the Data Subject's personal data may be communicated to parties based in countries outside the European Union that cooperate with the Data Controller to achieve the above-mentioned purposes. The transfer of data will take place only when there are international agreements in place or adequacy decisions by the Commission (article 45 of the Regulation) or binding corporate rules ("BCR" as per article 47 of the Regulation) or in any case on the basis of other appropriate safeguards that guarantee an adequate degree of protection to the personal data communicated or transferred. A copy of the personal data transferred abroad and a list of the international third countries/organisations to which the personal data have been transferred can be requested of the Data Controller by sending an email to privacy_sisal@legalmail.it.

8. Data retention

The Data Controller will retain the Data Subject's personal data for the following periods of time in line with the various purposes described in paragraph 4:

- for the management of the Contest, the Data Controller will keep the personal data for the entire duration of the Contest;
- for the fulfilment of legal obligations, the Data Controller will keep the personal data until the regulatory obligation or the order / provision of the authority and / or supervisory body is exhausted. On this point, it is specified that,

pursuant to tax legislation in Italy, the personal data of the interested parties will be kept for 10 years from the end of the Contest;

- for the pursuit of legitimate interests, the Data Controller will retain the personal data of the Data Subjects until such legitimate interests are exhausted, taking into account the balancing of the rights of the Data Controller and the Data Subject. It is specified that, in relation to the activities of sending to the Data Subjects, by the Data Controller, any surveys relating to investigating the degree of interest collected by the initiative or collecting evidence on the start-ups market, also for the purpose of developing the Contest, the personal data of the Data Subject will be kept for 36 months from the end of the Contest.

Once these time periods expire, the Data Controller will erase the Data Subjects' personal data or render them anonymous irreversibly. In the event of any further processing carried out for the management of complaints, for the exercise of a right in court or to fulfil further obligations established by law, these periods may be extended until the end of the management of the complaint, at the end of any judicial procedure established or at the end of the obligation established by law.

9. Data Subjects rights

The rights referred to in Articles from 15 to 22 of the Regulations are guaranteed. In particular, the Data Subject can obtain: a) confirmation of the existence of personal data processing concerning him and, in this case, access to such data; b) the correction of inaccurate personal data and the integration of incomplete personal data; c) the deletion of personal data concerning him, in cases where this is permitted by the Regulation; d) the limitation of processing, in the cases provided for by the Regulation; e) the communication, to the recipients to whom the personal data have been transmitted, of requests for rectification / cancellation of personal data and for the limitation of processing received by the Data Subject, unless this proves impossible or involves a disproportionate effort; f) the receipt, in a structured format, commonly used and readable by an automatic device, of the personal data provided to the Data Controller, as well as the transmission of the same to another data controller. The Data Subject also has the right to object at any time, for legitimate reasons, to the processing of personal data concerning him, even if pertinent to the purpose of the collection, without prejudice to the case in which the Data Controller demonstrates the presence of overriding legitimate reasons or the exercise or defence of a right pursuant to art. 21 of the Regulation. The Data Subject also has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or which significantly affects his person in a similar way, unless this decision: a) is necessary for the conclusion or execution of a contract between the interested party and the Data Controller; b) is authorized by the law of the Union or of the Member State to which the Owner is subject; c) is based on the explicit consent of the interested party. In the cases referred to in the aforementioned letters a) and c), the Data Subject has the right to obtain human intervention from the Data Controller, to express their opinion and to contest the decision. The Data Subject may submit requests to the address privacy_sisal@legalmail.it indicating in the subject "Privacy - exercise of privacy rights", detailing which right he intends to exercise and providing the Data Controller with the information needed to identify him pursuant to articles 11 and 12 of the Regulation. The Data Subject also has the right to lodge a complaint with the supervisory authority, in particular in the Member State in which he habitually resides, works or in the place where the alleged violation for which the complaint is submitted has occurred (e.g., the Garante per la protezione dei dati personali in Italy), as required by art. 77 of the Regulation, as well as to take the appropriate judicial offices pursuant to art. 78 and 79 of the Regulation.

10. Nature and mandatory obligation of the communication of personal data

The Data Subject's participation in the Contest is subject to the communication of personal data. This is mandatory for the purposes set out in paragraph 4, points a) and b). The Data Subject's refusal to provide the necessary data implies the impossibility of participating in the Contest. The processing for the purposes referred to in point c) is not mandatory and the Data Subject may oppose this processing in the manner indicated in the paragraph "Data Subjects rights" of this document, and if the Data Subject objects to said processing the data cannot be used for this purpose, except in the case in which the Data Controller demonstrates the presence of overriding legitimate reasons or the exercise or defence of a right pursuant to art. 21 of the Regulation.

11. Update of the privacy policy

The Data Controller reserves the right to periodically update the content of this page. The Data Subject is therefore invited to periodically consult the information contained herein so as to stay updated with respect to any changes that have occurred since the last consultation.