

Mod 002 Rev. 1.0 EN

PRIVACY POLICY

Dear User/Participant

Subject: Information on the processing of your personal data pursuant to Articles 13 and 14 of the EU Regulation 2016/679 (hereinafter, the "Regulations"), with regard to the processing of personal data and their free circulation within the European Union and request for your consent to carry out certain treatments.

CODEMOTION Srl's mission (hereafter, "CODEMOTION") is to connect IT programmers and experts, companies and researchers to help them create opportunities to exchange knowledge and information, professional growth and job opportunities. The core of this mission is our commitment to being transparent about data collection, how we use the data and the people we share them with.

In relation to your request to register for the event organised by CODEMOTION, a service connected to it or to subscribe to the newsletter or the web platform, we inform you that CODEMOTION is in possession of personal data related to you, acquired directly (through your specific request) or through third parties, in particular through the platform with which you have made the purchase or registration. The European Regulation EU 2016/679 provides that those who carry out processing of personal data are required to inform the subject concerned about the type of data processed and in relation to certain elements qualifying treatment. In accordance with the aforementioned Regulations and in particular the provisions set forth in arts. 7, 8, 13 and 14 of the Regulations, we provide the following information.

The identity of the controller

The data controller is CODEMOTION srl Via Marsala, 29 h - 00185 Rome e-mail: gdpr@codemotion.it

Nature of the processed data

The personal data processed are exclusively of a common nature, since they essentially consist of personal data, tax data, general information about your professional activity, your interests, *communities* to which you are registered (such as contacts, personal profiles on social platforms, personal information extracted from these profiles which is publicly accessible).

We are not in possession of any of your personal data relating to particular categories as defined by art. 9 of the Regulations. In order to carry out certain processing of some of these data, it is not provided that you consent to the processing, as this is necessary to fulfil your request for registration for the event organised by CODEMOTION. For other processing on the other hand, it is expected that you provide your consent: if it is your intention to grant it, please express your decisions in this regard in the dedicated section.

Purpose of the processing and period of conservation

Your data are processed for purposes related to the organisation and management of the event of CODEMOTION for which you have made the relevant registration; your data will be kept for the duration of the event and also subsequently, for the fulfilment of legal obligations and for the purposes allowed, and in any case for a duration not exceeding 5 years.

In particular, for participation in events organised by CODEMOTION, it is necessary to process your data both for security reasons and to allow you to use the services offered by CODEMOTION during the event. Specifically, you will be provided with a *personal badge*, necessary for your identification and use of certain services, meals, access to restricted areas.

The CODEMOTION *badge* contains personal information such as name, surname and company you belong to in addition to a QR Code. By registering for a CODEMOTION event, the participant is aware that, by allowing a sponsor,

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company or other participant to scan their QRCode, they authorise CODEMOTION to share with this person their contact details such as name, surname, company and email address for promotional and/or *recruiting* purposes.

CODEMOTION may from time to time and subject to the consent of the data subject send commercial offers, invitations to events and job opportunities consistent with the preferences expressed through participation in events organised by CODEMOTION and/or taking advantage of the related services and *software* made available.

Only with your explicit consent may your data be communicated by CODEMOTION to the sponsors/partners, in order for you to be subsequently contacted for purposes related to the events organised by it, for activities of *marketing* or *recruiting*,

Pursuant to arts. 21 and 22 of the Regulations, with reference to automatic processing, it is specified that: your data will not be used to make any automated decision-making process, including profiling, that produce legal effects that affect you or that have a similar impact on you.

It is possible to collaborate in the activities organised by CODEMOTION in the role of speaker, evangelist, content consultant, mentor and juror and it is a great opportunity to promote your experience and your knowledge through the CODEMOTION channels. CODEMOTION chooses its collaborators very carefully and its judgment is unquestionable. The information requested, should you be chosen for this role, is inherent to your biography, your professional life, photographs. This information will be publicly disclosed on all the channels of CODEMOTION, promotional and marketing materials, flyers, websites and e-mails with commercial offers, in order to maximise the effectiveness and dissemination of professional information that you have decided to share.

Processing methods

The processing of your data, within CODEMOTION, takes place through the use of tools and procedures suitable for guaranteeing security and confidentiality and can be carried out both on paper and through the use of IT tools. We specify that CODEMOTION implements the necessary technical and organisational measures, both physical and logical, to guarantee a level of safety appropriate to the risk, in line with the provisions of the Regulations (Article 32). In particular, where possible, *backup* and redundancy, integration with services of *single-sign-on* and pseudonymisation of identities on a *hashing* basis and encryption are implemented to guarantee a permanent anonymity within the company processes. The *segregation of duties* with regard to personal data is implemented at company level so as to make the data relevant to the performance of the task available only to persons in specific jobs.

Rights and obligations to give data

With regard to the personal data we need to know and process for the purposes set out in this document, as well as in order to fulfil the administrative-tax obligations provided for by national laws and regulations as well as by the Community legislation, or by provisions issued by Authorities for this purpose legitimated by the law and/or by the bodies in charge of control, your possible opposition to the processing of data implies in fact the impossibility to accept your registration and subsequent participation in the CODEMOTION event selected by you and/or services you required.

Regarding personal data relating to which explicit consent is required, for the purposes described in the previous points, any opposition to their processing could partially preclude the achievement of the objectives and additional purposes related to participation in the same event and/or the use of the services offered by CODEMOTION.

Which customer personal data are collected by CODEMOTION

We collect your personal data to provide and constantly improve our products and services. Below are the categories of data we collect:

• Data that you provide directly to us in relation to the CODEMOTION Services and Events.

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Data that are collected automatically: When you use the CODEMOTION Services, we automatically receive
and store certain categories of data, such as information about your user experience, including your
interaction with the CODEMOTION sites or mobile apps. Like many other websites, we use "cookies" and
other unique identification tools and we obtain certain data concerning you when your browser or device
accesses the CODEMOTION Services or other content provided by, or on behalf of, CODEMOTION on other
websites or services.

Data received from other sources: we may receive information about you from other sources, such as partner sites, external processors, information from publicly accessible social profiles (eg: EventBrite, Linkedin, Google, Facebook, etc.).

Extent of knowledge of your data

The following categories of subjects within our organisation may become aware of your data, as persons authorised to process, appointed by the author CODEMOTION, Data Controller:

- direct and administrative figures;
- organising and area *marketing* figures related to the event for which you have registered;
- technical staff of the IT area.

Communication and dissemination

Your data may be communicated by us, with this term meaning to give information to one or more subjects determined as external processors, however established within the member states of the European Union or the European Economic Area or in authorised countries on the basis of Decisions of Adequacy, in the following terms:

- to subjects who can access the data under the provisions of law, regulation or community legislation, within the limits set by these rules;
- to our external consultants (e.g. accounting firm and law firm), for administrative and accounting purposes, within
 the limits necessary to carry out their task on behalf of CODEMOTION, subject to our letter of appointment which
 imposes the duty of confidentiality and security;
- subject to your explicit consent, to the partners/sponsors of the event for which you have registered for the purposes previously indicated;
- to IT service providers, our qualified suppliers, within the services related to the conservation/archiving of CODEMOTION electronic archives (e.g. *cloud computing*).

Your data will not be disclosed in any way by us, where by this term we mean giving them to undetermined subjects in any way, including by making them available or consultable.

Your rights

With reference to arts. 13,14,15,16,17,18,19,20,21,22 of the Regulations, we report below the extract of your rights on personal data concerning you, which you can exercise towards the Controller of CODEMOTION:

- to obtain confirmation of whether or not processing of personal data concerning you and the related categories is being carried out and to obtain access to or a copy of the data being processed;
- to obtain the purposes of the processing;
- to obtain information on the origin of the data if not collected directly from the data subject:
- to obtain information on the recipients to whom the personal data have been or will be communicated (in particular to third-country recipients);
- to obtain information on the retention period of personal data or the criteria used to determine this period;
- to obtain the correction (to be communicated to all recipients to whom personal data were transmitted) or cancellation (right to be forgotten) of inaccurate data without undue delay, as well as the limitation on processing in the cases provided for by the Regulations;
- to obtain the opposition to the processing of data concerning you at any time, except for the existence of
 legitimate reasons of the Owner or for the assessment, exercise or defence of a right in court. In case of
 direct marketing in particular you can obtain the opposition to the processing at any time to the extent that it
 is connected with such activity: the personal data for which you have refused processing cannot be the
 object of processing for such purposes;

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- the existence of the right to revoke at any time without prejudice to the lawfulness of the processing, the consent given prior to the revocation, if the processing is based on art. 6 (express consent for one or more purposes) or on art. 9 (explicit consent for particular categories of data);
- the existence of the right to lodge a complaint with a supervisory authority;
- the right to obtain the portability of personal data concerning you (processed by automated means), or to receive them in a structured format, commonly used and readable by an automatic device to transmit them to another Controller (or obtain direct transmission between Controller where technically feasible), without impediments by the previous Controller to whom he/she has provided them, unless the processing is necessary for the performance of a task carried out in the public interest or in connection with the exercise of public authority vested in the Controller.

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