

PRIVACY NOTICE UNDER ARTICLE 13 OF EU REGULATION 679/16

Meeting Project srl (hereinafter the "Company") is committed to protecting the privacy of its online users. This document has been drawn up in compliance with Article 13 of the EU Regulation 2016/679 (hereinafter the "Regulation") to allow you to familiarize yourself with our privacy policy, to understand how your personal data are processed when you use our website (hereinafter the "Website"). The information and data provided by you or otherwise acquired when you use our Website shall be processed in accordance with the Regulation's provisions and the confidentiality obligations governing the Company's business.

According to the provisions in the Regulation, the Company shall process data based on the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimization, accuracy, integrity, and confidentiality.

1) DATA CONTROLLER and CONTACT DETAILS OF THE DPO

The Data Controller is Meeting Project srl (Tax Code/VAT no. 02141810131), headquartered in Merate 23807, Via Donato Frisia, 2. The Data Controller, including for exercising the rights referred to in Paragraph 7) below, can be contacted directly at the Company's registered office.

The Company has appointed a Contact Person for data protection and the exercise of data subject rights; you may contact such Contact Person at the following email address: ghazzi@meetingproject.com.

2) PURPOSE OF DATA PROCESSING

The processing of the personal data provided shall be carried out in compliance with the requirements on lawfulness (EU Reg. 2016/679) for the following purposes:

- navigation on this Website;
- a possible request for contact, including sending commercial and technical information requested by you;
- general administrative-accounting activities. For the implementation of personal data protection provisions, processing for administrative-accounting purposes means processing related to the performance of organizational, administrative, financial, and accounting activities, regardless of the type of data processed. Specifically, internal organizational activities, activities instrumental to fulfilling contractual and pre-contractual obligations, and informative activities pursue such purposes.

[The data shall not be used for marketing purposes without specific and voluntary consent, which may be requested at a later date.](#)

3) PERSONAL DATA SUBJECT TO PROCESSING AND LEGAL BASIS FOR PROCESSING

a. Navigation Data

During their regular operation, the IT systems and software processes used to operate the Website acquire some Personal Data whose submission is inherent in Internet communication protocols. Such information is not collected to be associated with identifiable data subjects but, by its very nature, could make it possible to identify users through processing and association with data held by third parties. This category of data includes the IP addresses or domain names of the computers employed by the users who connect to the Website, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the answer given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. These data are used solely to obtain

anonymous statistical information on the use of the Website and to check its correct functioning, to identify anomalies and/or abuses, and are deleted immediately after processing. The data could be used to establish liability in case of hypothetical computer crimes against the Website or third parties. The legal basis for processing is Article 6(1)(f) (legitimate interest of the Data Controller).

b. Data Voluntarily Provided by the Data Subject

The "Contact Us" page shows the contact details by which you can contact our Company. The submission of data (first name, last name, email, telephone) as part of the request made by the data subject may be necessary to acknowledge it. The legal basis for the processing of such data is Article (6)(1)(b) of the Regulation, as the processing is necessary for the provision of the Services or for the acknowledgment of requests made by the data subject. Providing Personal Data for these purposes is optional, but failure to provide them would make it impossible to respond to requests.

4) CATEGORIES OF DATA RECIPIENTS

To achieve the purposes explained above, Personal Data may be shared with the following:

- a. Persons typically acting as data processors, i.e., i) individuals, consultants, companies, or professional firms that provide assistance and advice to the Company in accounting, administrative, commercial, legal, tax, and financial matters concerning the provision of the Services; ii) persons we need to interact with for the provision of the Services (e.g., hosting providers, or IT/marketing service providers) or persons appointed to perform technical maintenance activities (including maintenance of network equipment and electronic communication networks); (collectively the "**Recipients**");
- b. Individuals, entities, or authorities that are required to be informed of your personal data under legal provisions or by orders of the authorities;
- c. Persons authorized by the Company to process Personal Data as necessary to carry out activities strictly related to the provision of the Services, who have committed to confidentiality or have an appropriate legal obligation of confidentiality.

5) TRANSFER OF PERSONAL DATA

The personal data provided shall be disclosed to the recipients, who will process the data in their capacity as data controllers (Article 28 of EU Regulation 2016/679) and/or as natural persons acting under the authority of the Data Controller and Data Processor (Article 29 of EU Regulation 2016/679), for the purposes listed above.

Specifically, the data shall be disclosed to the following:

- a. Persons providing services for managing the IT system used by the Company and the telecommunications networks;
- b. Freelancers, firms, or companies in the context of assistance and consulting relationships;
- c. Competent authorities to fulfill legal obligations and/or comply with the provisions of public authorities if they so request. The persons in the above categories act as Data Processors or operate independently as separate Data Controllers. The list of Data Processors is constantly updated and

accessible by writing to ghezzi@meetingproject.com.

6) DATA STORAGE

The processing shall be carried out by automated means and manually by individuals specially appointed for this purpose, using methods and tools designed to ensure maximum security and confidentiality.

In compliance with the provisions of Article (5) (1) (e) of EU Regulation 2016/679, the personal data collected shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

The storage of the personal data provided depends on the purpose of processing:

- a. Browsing on this Website (see cookie policy)
- b. Contact request (max. two years).

The time frame is determined based on criteria about which the data subject can receive information by writing to the following email address: ghezzi@meetingproject.com.

7) RIGHTS OF THE DATA SUBJECTS

Under Articles 15 et seq. of the Regulation, you have the right to request from the Company, at any time, access to, rectification, or deletion of your Personal Data or to object to the processing of the same; you also have the right to request the restriction of processing in the cases provided for in Article 18 of the Regulation as well as to receive the personal data concerning you in a structured, commonly used and machine-readable format in the cases provided for in Article 20 of the Regulation.

Requests should be submitted in writing to the following email address: ghezzi@meetingproject.com.

In any event, you always retain the right to lodge a complaint with the competent Data Protection Authority (Garante per la Protezione dei Dati Personali) under Article 77 of the Regulation if you believe that the processing of your Personal Data is contrary to the legislation in force.

8) AMENDMENT OF THIS NOTICE

This privacy notice is effective as of 17/10/2018. The Company reserves the right to amend or update its content, in part or in full, also following changes in the applicable legislation. We, therefore, invite you to visit this section regularly to acquaint yourself with the most recent and up-to-date version of the privacy notice under Article 13 and to stay informed about the data collected and their use by the Data Controller.

The Data Controller



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