



**Fiera Nazionale  
della Piccola  
e Media Editoria  
– Roma**

## **RIGHTS CENTRE – PRIVACY POLICY**

### **COMPLETE POLICY ON PERSONAL DATA PROTECTION**

Pursuant to articles 12, 13, 14 of the General Data Protection Regulation (UE) 2016/679, the following document serves the purpose of informing the subjects about the processing of their personal data.

#### **Joint Controllers**

Personal data are processed by:

**AIE – Associazione Italiana Editori** (*Italian Publishers Association*) and its service agency and sole shareholder **Ediser S.r.l.**, both established in Milan, Corso di Porta Romana 108 – 20122.

The Joint Controllers determine the purposes and means of processing with regard to the event “*Più Libri Più Liberi*” and they established their respective roles and responsibilities, pursuant to the obligations stemming from the GDPR, by means of a contract pursuant to article 26 of the Regulation.

AIE – Associazione Italiana Editori (*Italian Publishers Association*) is the promoter of “*Più Libri Più Liberi*”, and Ediser is the organizational manager.

#### **Processing Purposes**

We collect personal data through the Application Form for the following purposes:

1. To follow your application as a candidate to the “rights centre” initiative and perform an objective evaluation of your professional requirements and keep you updated if selected;
2. To keep you informed and updated about the event “*Più Libri Più Liberi*” and its future editions;
3. Prior consent, to send updates, informative and commercial communications, promotion of events and other promotional activities regarding books and reading activities promoted by the Joint Controllers AIE – Associazione Italiana Editori (Italian Publishers Association) and Ediser S.r.l., by means of traditional and automatized communication;
4. Prior consent, to send updates, informative and commercial communications, promotion for events and other promotional activities - by traditional and mechanized means of communication – promoted by Fondazione LIA, in partnership with AIE Associazione Italiana Editori (Italian Publishers Association) .



### **Legal Basis**

Pursuant to article 6 GDPR, the processing of your personal data is lawful because necessary in order to fulfill the data subject requests; therefore, the processing of data regarding point 1 listed above does not require the subject's prior consent.

With regard to the purpose described in point 2, the processing is lawful because it is the legitimate interest pursued by the Joint Controllers, therefore the Italian Authority states that a Controller may use contact information to send communications, without the prior consent of the data subject, provided that these are communications concerning the initiative with respect to which a qualified relationship is already in place between the Controller and the Data subject.

With regard to purposes 3 and 4 listed above, the processing of personal data is based on the explicit consent freely given by the data subject.

### **Data Provision**

The provision of personal data is necessary in order to fulfill the purposes listed in points 1 and 2 listed above; should the subject deny the provision of his/her data, it would be impossible for the Controllers to fulfill the application for the "rights centre" initiative.

The provision of personal data for marketing purposes (points 3 and 4) is optional, denial will not cause any consequence, except the impossibility to receive further information and promotional updates.

### **Processing Methods**

Processing of Personal Data means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Regarding security, we guarantee that the data bases are accessible only by authorized personnel, as well as the respective operations described above; and we inform you that your data will be processed through electronic or automated and non-automated means (paper archives), both provided with adequate security measures as stated in the GDPR, in order to prevent data loss, unlawful use and non-authorized access.



The data collected will not be processed or used for purposes different from those listed above or that could, in any way, compromise the rights and freedoms recognized to the data subjects.

#### **Data Recipients**

Without prejudice to communications necessary to fulfill legal obligations, the Controllers will make your data known to Third Parties specifically chosen and authorized by the Controllers to perform activities correlated to the purposes listed above such as:

- commercial and operational partners who carry out activities related to the management and organization of the initiative;
- external entities providing support in the management of communications;
- external entities for the management of the information system, the website or databases and telecommunications networks;
- FASI S.r.l., in charge of the event's Organizing Secretariat.

#### **Extra EU Data Transfer**

The Data Controller does not voluntarily transfer any data outside of the European Union borders. We inform you that the Controller uses Microsoft Azure Cloud Service, which guarantees proper measures of protection of personal data, among them:

- ISO/IEC 27001 Certification on Information Security and ISO/IEC 27018 Certification on Cloud Services and Privacy

Regarding Extra EU data transfer, the Data Controller specifically requests the data stays within the European Union borders, although technical and maintenance reasons might require the data to be transferred outside of the EEA; the provider anyway guarantees:

- that the data will be transferred in countries deemed adequate by the EU Commission
- to sign specific Standard Clauses regarding Extra EU data transfer – as stated by the EU Commission – in order to guarantee safe transferring and processing of the data outside of the EU borders.
- compliance with the EU-US Privacy Shield Framework

#### **Data Conservation Duration**

We will keep your personal data for a limited span of time, after which it will permanently be deleted or irreversibly anonymized.



Specifically:

- with regard to the purpose expressed in point 1, we will keep your data, in compliance with the Regulation on Personal Data Protection, until the evaluation of your application is completed;
- with regard to the purposes expressed in points 2, 3 and 4, your data will be stored for an adequate and proportional amount of time, without prejudice to your right to revoke your consent to marketing communications at any moment.

### **Data Subject's Rights**

Pursuant to the GDPR, the data subject has the right to request to the Joint Data Controllers: access to his/her personal data (art. 15), rectification (art. 16), erasure (art. 17), restriction (art. 18), portability (art. 20), object (art. 21) and object an automated individual decision-making which might cause legal consequences on the data subject or might impact his/her person (art. 22).

Should the processing of personal data be based on the freely given consent of the data subject, pursuant to article 7 clause 3 GDPR, the data subject has the right to revoke his consent to receive communications and updates for marketing and commercial purposes.

The data subject has the right to lodge a complaint with the supervisory Authority (article 77 GDPR), should the Exhibitors consider the processing of their personal data by the Joint Controller unlawful with respect to the law on personal data protection. In Italy, the complaint can be lodged with the Italian Data Protection Authority. For further information on how to lodge a complaint visit the website: [www.garanteprivacy.it](http://www.garanteprivacy.it)

Claims can be brought before the Joint Controllers:

- by e-mail: [privacy@aie.it](mailto:privacy@aie.it)
- by e-mail: [privacy@ediser.it](mailto:privacy@ediser.it)
- by mail to: Corso di Porta Romana, 108 – 20122 Milan (Italy)

In order to guarantee that the data will not be violated or used unlawfully by Third Parties, before we allow you to exercise the rights listed above, we might need to ask you for further information to ensure your identity.

*Last update 9<sup>th</sup> October 2019*