

Privacy statement in compliance with Legislative Decree no. 196/2003, as amended by d.lgs. n. 101/2018, and EU Regulation 679/2016

In compliance with article 13 of the EU Regulation 679/2016, this privacy statement aims at describing the methods adopted for processing personal data of the users in order to enable the online registration and/or entry to institutional and/or congress events organised and managed by Triumph Italy S.r.l. This policy explains how and why Triumph Italy collects and uses the personal information of its members, customers and congress delegates, and how Triumph Italy protects your privacy. It may be amended at any time so we will send you the new privacy policy. However we invite you to visit this page regularly for check updates.

Data Controller:

The Controller of the processing of data is **Triumph Italy S.r.l.**, with premises in Via Lucilio n. 60 – 00136 Rome (Italy), in the person of its pro-tempore legal representative Mr Luca Colaianni.

Contact details of the Data Controller: 0635530280

e-mail: privacy@thetriumph.com

How Triumph collects personal information:

Triumph Italy collects personal information in a number of ways from a number of sources.

The sources of personal information received by Triumph Italy are:

- The individuals themselves
- Third parties acting on behalf of individuals (eg an agent arranging registration or hotel accommodation)
- Affiliated Association providing details of their member

The principal ways in which Triumph Italy collects personal information are:

- When you register personal details when creating or updating our Registration website, or enter details on a specific application for an WCD Grant or other award
- When you, or an agent or other third party acting on your behalf, enter personal details on a form requesting a Triumph Italy product or service
- When you, or someone on your behalf, submits proposals or content in connection with scientific sessions at a Congress or meeting organised by Triumph Italy (eg Abstracts submission)

As per Article 14 of the European Regulation 2016/679, where we receive personal information about individuals from sources other than the individuals themselves, we will take all practical steps to contact the person concerned to advise of their rights.

What personal information is collected by Triumph Italy and Purpose of the processing:

- 1. Formalize and managed the participation in the event organised:** Nominative data¹ - Title, First Name(s), Family Name(s), Residence, Country, ecc- Credit Card information², Email

¹ your nominative details are needed to properly identify you, to communicate with you, to provide you with the products and services you have requested, to ensure that items are properly labelled as yours (eg certificates of attendance, congress badges and scientific contributions such as abstracts and presentations, etc), setup your personal account after your Registration, provide you with space in our Registration website where you can provide/review/edit your personal information.

address³, Telephone, Professional status⁴, sensitive data⁵, Institution and role, will be processed lawfully and fairly for the following purpose: collection of entries and/or registrations in order to enable Triumph Italy S.r.l. to implement all the necessary steps to formalize and managed the participation in the event organised by the Company itself. The processing of data mentioned above is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6, par. 1, lett. b, Reg. Ue 2016/679).

Moreover, your email address is needed because it is used for individual communications with you about specific matters - eg sending confirmations, receipts, requesting further information to solve queries and sending emails to you with information about the event(eg. timetable of congress, programme and its changing, send notifications-alerts of the event to you etc.). In this case, the processing of data is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6, par. 1, lett. b, Reg. Ue 2016/679).

In order to perform the contractual activity, it may be appropriate for the user making the online registration to specify also sensitive data (e.g. specific dietary requirements, such as intolerances or allergies, or any physical disability or limitation) and to release the consent for processing them (Art. 6, par. 1, lett. a, Reg. Ue 2016/679). In this way, Triumph Italy s.r.l. can guarantee you a level of service corresponding to your necessity and personal situation (eg. Food intolerances, special equipment for disabled). In the event, the data subject has not given consent to the processing of his or her personal data, Triumph Italy s.r.l. shall not be able to guarantee the quality of the service offered to the user.

Nominative data and Email address are mandatory in order for the Data Controller to proceed with the processing of your request to participate in the event. In case of refusal, it will not be possible to complete the registration procedure and the Controller cannot perform the contractual obligations. Credit Card information, Telephone, Professional status, Affiliation information, Dietary requirements, Institution and role are not mandatory data, but if they are not communicate to the data controller, Triumph Italy S.r.l. shall not be able to guarantee the service and its quality to the user.

Promotion of Congress: During WCD congress or event, attendees may be photographed and videotaped by Triumph or its partners capturing the event. Some of these photographs or videos may be displayed by Triumph in future publications or materials connected with the event as well

2 Credit Card information is required for anyone wishing to make payment by this method. The foregoing data – that are required in the event the payment of a fee is necessary or the participant wants to make also the hotel booking – can be disclosed / communicated to third parties (eg. Hotel) for purposes strictly related to the performance of the contract obligations.

3 Your email address is needed because it is used as part of the login information (to access our Registration website) (eg and provide you with order/request confirmations. Furthermore, it permits “Forgot Password” to be handled in an automated secure way.

4 Professional status is requested for all persons requesting certain fees (eg specific registration fees for congresses and events). Without the communication of this data, we could not apply the special fee.

5 Specific dietary requirements, such as intolerances or allergies, or any physical disability or limitation

as social media. For WCD promotional purposes, during the event photos of participants will be taken. The photos will be subsequently published on social media. These photos will not allow, directly or indirectly, the univocal identification of the participants as their faces will not be clearly visible and they will not be identified with name and surname. In any case, if you believe that the data controller has not respected the specification above or that there is a violation of your rights as provided by law on copyright and/or data protection, please write to us at the following address privacy@thetriumph.com. Triumph, once received your complaint, will evaluate if the photo can continue to be published on social media or not and will subsequently inform you.

2. Marketing purpose:

- **Direct marketing.** Your email address could be used to send newsletter about other WCD congress or other similar events always organized by Triumph. The Lawfulness of processing is the legitimate interests pursued by the controller or by a third party (Art. 6, par. 1, lett. f, Reg. Ue 2016/679).
- **Commercial and promotion purposes:** Your email address, only with your consent, could be used to send you Triumph commercial promotions (Art. 6, par. 1, lett. a, Reg. Ue 2016/679).

3. Processing for statistical purposes: Your country of origin, and only this data will be used for statistical purposes. Statistical purposes mean any operation of collection and the processing of personal data necessary for statistical surveys or for the production of statistical results. The statistical purpose implies that the result of processing for statistical purposes is not personal data, but aggregate data, and that this result or the personal data are not used in support of measures or decisions regarding any particular natural person. Triumph Italy s.r.l. ensures that technical and organisational measures are in place in particular in order to ensure respect for the principle of data minimisation. Moreover, the data controller will process your data in compliance with the provisions of artt. 104-105, d.lgs. n. 196/2003. The Lawfulness of processing is the legitimate interests pursued by the controller or by a third party (Art. 6, par. 1, lett. f, Reg. Ue 2016/679).

4. Processing for Fellowship and awards: Nominative data - Title, First Name(s), Family Name(s), Residence, Country, ecc- Email address, Professional status , Affiliation information, abstract , CV are processed for scientific programme activities in connection with Triumph Italy congresses and meetings (e.g. include abstract submission and grading process, speaker and chairperson management, handling of agreement forms, preparation of the scientific programme, presentation management onsite, publication of the scientific content on the Congress or Triumph Italy website), for Training Fellowships or other awards and for Fellowship and Membership applications. This processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6, par. 1, lett. b, Reg. Ue 2016/679).

Procedures for processing:

Your personal data will be processed by the Data Controller, by Data Processors appointed by the Controller and by people in charge of the processing who have been strictly authorised. If you want to know which are the processor, you have to send an email to privacy@thetriumph.com Specific security measures are adopted in order to prevent data loss, unlawful or incorrect uses as well as unauthorized accesses. Access to personal data is limited to employees and contract

workers who need such information to carry out their activity, as well to manage, develop and improve our services.

Disclosure of data to third parties:

In this context, your personal data may be disclosed to the following external partners of the Triumph Italy s.r.l. in the circumstances described below:

- Data processing for Fellowship and awards purposes are made available to the committee responsible for assessing the applications and making the awards and also to companies that finance the fellowship because they have to respect provisions and deontological rules of transparency declare in EFPIA HCP CODE.
- Data can be disclosed by Triumph to other companies belonging to Triumph Group and to companies commissioning the event in order to perform all its contractual obligations;
- Consultant and freelance professional; consultant companies; bank or similar; hotel, bed and breakfast or similar; in order to respect a legal obligation, public institution that operate in the field of finance, tax, security, etc.
- Each participant shall consider that by accepting any scanning of the badge / or SpotMe QR code at any stand at the Congress or Symposium, the participant gives his/her consent to the WCD Organising Secretariat to transfer their data. In fact, this is a clear affirmative action, that signifies agreement to the processing of personal data relating to yourself (Art. 6, par. 1, lett. a, Reg. Ue 2016/679 and art. 4, par. 1, n.11, Reg. Ue 2016/679). So, If you accept to have your badge scanned when visiting an exhibiting company stand, or by a hostess at an Industry Sponsor session, your badge will enable them to retrieve the following personal data: nominative (title, first name(s), last name(s), address (postal address and email), country, telephone, fax_and profile information (professional activity, place of work and fields of interest). So, If you accept to have your badge scanned when visiting an exhibiting company stand, or by a hostess at an Industry Sponsor session, your personal data will be disclosure to the sponsor of the congress or third party that have the stand in the congress.

Data retention periods:

- **Formalize and managed the participation in the event:** Your personal data shall be kept for the amount of time that is strictly necessary in order to organise and manage the event, save for different and further time indications required by law.
- **Commercial and promotion purposes:** your data will be processing for two years from release of your consent.
- **Direct Marketing:** your data will be processing until you will exercise your right to object.
- **Processing for statistical purposes:** your personal data will be processing only for the time necessary for the production of statistical results.
- **Fellowship and awards:** Your personal data shall be kept for the amount of time that is strictly necessary in order to organise and manage the event, save for different and further time indications required by law.

Existence of an automated decision-making process (profiling)

No automated decision-making process is used.

Transfer of data to third countries or international organisations:

The Data Controller does not intend to transfer the data collected to third Countries or international organisations.

Rights of the data subjects:

- **Right of access by the data subject (art. 15, GDPR)** – The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data
- **Right to rectification (art. 16, GDPR)** - The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.
- **Right to erasure ('right to be forgotten') (art. 17, GDPR)**- The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay.
- **Right to restriction of processing (art. 18, GDPR)**. The data subject shall have the right to obtain from the controller restriction of processing at the condition of art. 18 of reg ue-- ;
- **Right to data portability (art. 20, GDPR)**. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided,;
- **Right of withdrawal from consent** - You have the right to withdraw your consent to the processing of your data at any time, subject to the lawfulness of the processing prior to your consent revocation;
- **Right to propose a complaint to the following Supervisory Authority:** “Garante per la protezione dei dati personali”, Piazza Venezia n. 11 - 00187 Roma, email: garante@gpdp.it, website: <https://www.garanteprivacy.it/>

Right to object (art. 21, GDPR)

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims