



## **PRIVACY POLICY REGISTRATION “ADI - COMPASSO D’ORO INTERNATIONAL AWARD”**

Pursuant to Article 13 of Data Protection Regulation (EU) 2016/679 (“**GDPR**”), we would like to inform you about the processing of your personal data collected in the registration form on our website <https://www.compassodorointernational.com> (the “**Website**”) and as part of your registration, through the Website, for the “ADI - ADI - COMPASSO D’ORO INTERNATIONAL AWARD” competition.

Detailed information may be provided, separately or later, in connection with additional or specific processing of personal data.

### **1) THE PROCESSING “CONTROLLER”**

The data controller is ADI Associazione per il Disegno Industriale, with registered offices at Via Bramante 29, 20154 Milan, Italy, tax code 80108770159 (the “**Controller**” or “**ADI**”). To request information about data processing or to exercise your rights to the data as set forth in Section 6 below, please contact the Data Controller at [privacy@adi-design.org](mailto:privacy@adi-design.org).

### **2) PERSONAL DATA PROCESSED CATEGORIES - DATA PROCESSING PURPOSE AND LEGAL BASIS**

The Controller processes the personal data collected as part of the opening of your personal account, which is necessary to proceed with the registration, via the Website, for the “ADI - ADI - COMPASSO D’ORO INTERNATIONAL AWARD” competition. In particular, when creating your account, you will be asked to enter the following information: first name, last name, email address, password. In addition, during the registration process, following the creation of the account, for the competition “ADI - ADI - COMPASSO D’ORO INTERNATIONAL AWARD” through the Website, additional, in addition to information related to the competing project, personal data necessary for the registration are collected and processed, such as, but not limited to: first name, last name, address, email address and telephone number of the designer participating in the competition, or contact data of the company participating in the award, as well as tax code, bank data and data relating to the means of payment of the fee for the entry of the award.

It is understood that if any information referring to third parties is to be collected, processed and communicated to us, it shall be done in accordance with the provisions of the applicable legislation, including the GDPR, and, therefore, prior notice of the processing shall be given to such third parties and, if necessary, free and express consent shall be collected before processing.

The personal data collected are processed by the Controller to fulfill purposes instrumental and functional to the contractual and/or pre-contractual relationship (*i.e.*, participation in the award) and to the fulfillment of legal and regulatory obligations the Controller is bound to by virtue of the activity exercised, in particular for the purpose of:



1) **managing pre-contractual fulfilments, executing the contractual relationship and the related fulfilments, including regulatory fulfilments:** the processing of personal data is carried out in order to give course to the activities preliminary and consequent to the registration to the prize and to those instrumental and functional to its execution, as well as for the fulfilment of any other obligation descending from the contract or from the existing relationship. This also includes the admission to the competition and the execution of the same;

2) **fulfillment of legal obligations:** the processing of personal data may be necessary or necessitated by the fulfillment of obligations arising from the law or from regulations, national and/or EU, in force and applicable to the Controller, as well as from provisions issued by competent authorities and bodies;

3) **to pursue a legitimate interest of the Controller:** ADI may process personal data for the legal defense of its own right or interest before any competent authority or body; to proceed with the direct offer of products or services similar to those object of previous purchase or membership (e.g., proposal for participation in a contest for subsequent years), limited to the e-mail coordinates provided in the contractual/commercial context and subject to opposition to such processing (so-called *soft spamming*), as well as for the management of the archive of contest participants and statistical processing, in aggregate form, for internal purposes;

### **3) MANDATORY OR OPTIONAL NATURE OF PERSONAL DATA PROVISION**

The provision of the personal data marked as mandatory is indispensable for the opening of the account required for entry into the prize and for registration for the prize itself. As for the provision of the other personal data for the purposes set out in points 1) to 3) of paragraph 2 above, it is merely optional. However, since such processing is necessary to enable registration and participation in the prize, failure to provide, partial or inaccurate provision of the data in question could result in the impossibility, as the case may be, to execute and/or manage participation in the prize or to properly carry out all related obligations, as well as the impossibility for the Data Controller to send you generic information on events similar to the prize, or otherwise to pursue its own legitimate interests (such as the defense in court of its own right).

### **4) DATA COMMUNICATION - DATA TRANSFER OUTSIDE THE EU**

Within the structure of the Controller, your personal data will be processed, each to the extent of its competence, by authorized individuals pertaining to our administrative and support functions, as well as by individuals involved in the organization of the award. For exclusive reasons of technical support of Controller's IT system, the data recorded therein may be accessible to our IT personnel.



Any IT service providers who may - for support, maintenance or rescue purposes - come into contact with the personal data will be expressly authorized by the Controller, and will operate under stringent [contractual obligations or as data processors under the GDPR. Payment for the contest entry will be made to ADI per S.r.l., which performs certain services on behalf of ADI and has been designated as a data processor under Article 28 of the GDPR.

For the purpose of implementing the purposes stated herein, your personal data may be disclosed, including abroad, to the subjects or categories of subjects listed below and always only in connection with the implementation of the purposes stated in paragraph 2 above:

- (a) public authorities, administrations and/or agencies to carry out legal, secondary or EU regulatory requirements;
- (b) any suppliers, subcontractors, business partners, collaborators in various capacities of the Controller, as part of the organization of the competition, including by way of example the members of the jury deputed to evaluate the prize, ADI per S.r.l. and Fondazione ADI Collezione Compasso d'Oro. These parties may act as autonomous data controllers or as data processors designated by the Controller pursuant to Article 28 of the GDPR;
- (c) external subjects who carry out in Italy or abroad specific tasks on behalf of the Controller (such as, by way of example only, certification of financial statements, invoicing and filing of invoices, shipping of documents and materials, insurance coverage, debt collection, professional legal, accounting and/or tax advice, crediting and/or debiting of economic entitlements). These parties may act as autonomous data controllers or data processors designated by the Controller pursuant to Article 28 of the GDPR.

To find out the identity, activities carried out and the framework under the GDPR of third parties who may process your personal data, you can submit a specific request to [privacy@adi-design.org](mailto:privacy@adi-design.org).

Should ADI make use of web service providers located outside the EU or the European Economic Area (EEA) that have access to some of Your personal data, the Controller will provide full information and will verify that every measure (contractual and non-contractual) appropriate and necessary to ensure an adequate level of protection of their personal data is taken in accordance with and in the manner indicated by Chapter V of the GDPR and, in any case, by the legislation in force at the time regarding the protection of personal data. In any case, you may always request more information about the identity of non-EU third parties who may know/process your personal data and the activities they carry out by making a request to the Data Controller at [privacy@adi-design.org](mailto:privacy@adi-design.org).



## **5) DATA PROCESSING METHODS - RETENTION TIME**

The processing of your personal data is carried out in a lawful, correct, confidential manner and is carried out for purposes that are determined, explicit, legitimate and not exceeding the above-mentioned purposes. The processing of personal data is carried out with the help of paper, optical, computer and telematic media, possibly also in cloud, as well as through automated and computerized procedures, always, however, according to criteria of maximum fairness and security, in accordance with the provisions of the applicable legislation on the protection of personal data and through appropriate technical and organizational measures suitable to prevent the destruction or loss of data, illicit or incorrect use and unauthorized access.

Your personal data will be processed and stored for the entire duration of the award and, thereafter, for the maximum time provided for by the applicable legal provisions regarding the prescription of rights and/or forfeiture of action (including in the administrative-fiscal field) and, in general, for the exercise/defense of Controller's rights in disputes brought by public authorities, public subjects/entities and private parties. As for the personal data of the user who has registered an account, these will be kept as long as the account is active, to the extent strictly necessary for the user; even after the account is closed, personal data may be kept, if necessary, to comply with obligations imposed by laws or regulations, to protect our rights or to prevent fraud. Contest winners' data may be retained and published on Controller's website even after the expiration of the above terms.

Once all the purposes legitimizing the storage of personal data have been exhausted, the Controller will take care to delete them, compatibly with technical back-up procedures, or transform them into anonymous form.

## **6) DATA SUBJECT'S RIGHTS**

As a data subject, you have the right to ask the controller for access to, rectification, deletion of data, restriction of processing or to object to the processing of data under the conditions set out in Articles 15,16,17,18,21 of the GDPR. Finally, the data subject has the right to lodge a complaint with a Supervisory Authority if he or she believes that the processing concerning him or her violates the legislation applicable to the protection of his or her data. To exercise your data rights, please contact the Controller at [privacy@adi-design.org](mailto:privacy@adi-design.org).

## **7) UPDATE OF THIS PRIVACY POLICY**

The information rendered here may be subject to revision as a result of:

- changes in data protection legislation, for the aspects of interest here;

# ADI



FONDAZIONE **ADI**  
COLLEZIONE **COMPASSO D'ORO**

- technological implementations adopted by the Controller that impact the current processing methods;
- organizational changes in the structure of the Controller that may affect the data subject.

Users are kindly invited to consult this policy periodically so that they are constantly updated on the features of the processing.