

## PRIVACY POLICY REGARDING RECORDINGS AT CHORUS LIFE

Pursuant to the European Data Protection Regulation No. 2016/679 (the "**Regulation**"), the Controller hereby informs visitors to the *Chorus Life smart district* and participants at events held at the *Chorus Life smart district* (collectively the "**Attendees**") about how personal data collected through photographic and/or audio-video recordings (the "**Recordings**") is processed.

### 1. Who is the Controller?

The joint controllers for the purposes listed in paragraph 3 below (collectively the "**Controller**") are identified in the following table. In particular, there are different joint controllers, depending on the area of the Smart District where the event or activity takes place.

Area	Contitolari
Common areas of the Smart District	Chorus Life S.p.A., with registered office in viale Vittorio Emanuele II, 10/M, Bergamo, registration number in the Bergamo companies register, Italian fiscal code and VAT no. 02162710160 (" <b>Chorus Life</b> ") and ChorusXP S.r.l. with registered office in via Madonna della Neve, 27, Bergamo, registration number in the Bergamo companies register, Italian fiscal code and VAT no. 04759010160 (" <b>Chorus XP</b> ").
Arena	<b>Chorus Life</b> and <b>ChorusXP</b> and <b>Chorus Life Arena S.r.l.</b> with registered office in via Madonna della Neve, 27, Bergamo, registration number in the Bergamo companies register, Italian fiscal code and VAT no. 04779020165.

The joint controllers have entered into a joint controller agreement. The essential content of this agreement is made available to data subjects upon request sent pursuant to paragraph 7 below.

### 2. What Data is being processed?

The data processed by the Controller includes images (static and/or moving) and/or voice recordings of the Attendees collected through the Recordings (the "**Personal Data**" or "**Data**").

### 3. For what purpose and on what basis is the Data processed?

Personal Data is processed to showcase events and activities taking place at the *Chorus Life smart district* and distribute them using its communication channels. To this end, the Recordings may be distributed through commonly used communication channels such as websites, the Chorus Life app and the Controller's social

media platforms. Since the Recordings are made during events taking place in public or in places held open to the public, consent is not required. The Attendees' access to Chorus Life spaces will therefore be considered as a sufficient condition to legitimately create the Recordings and make them available, including through publication.

The Attendee's Personal Data may also be processed based on the Controller's legitimate interest in conducting corporate operations or managing/exercising its rights, for example during corporate transactions (sale of the company or business units), due diligence procedures, when defending legal claims, and in relation to any related preliminary activities.

#### **4. How long is Personal Data retained?**

Personal Data is retained in accordance with applicable legal provisions, for no longer than necessary to fulfil the purposes for which it is processed.

Specifically, the Recordings will be kept for as long as they are reasonably useful to the Controller for documenting and publicising events and activities, including for record-keeping purposes.

Subsequently, the Data will be deleted, aggregated, or anonymised.

#### **5. How is Personal Data processed?**

The processing of Personal Data is carried out by means of computerised and manual tools, with logic strictly related to the aforesaid purposes and, in any case, in such a way as to guarantee their security and always in compliance with the provisions of the Regulation.

#### **6. To whom is Personal Data disclosed? Is Data transferred abroad?**

Personal Data will be processed by authorized personnel within Chorus Life, Chorus XP and Chorus Life Arena S.r.l. and may be communicated solely and exclusively for the purposes indicated above and, where necessary, to the following categories of persons:

- IT service providers and social media platforms;
- Publishers;
- photographers, consultants, video editing service providers;
- third-party companies, in case of corporate transactions.

Where required by law, the data may also be disclosed to the competent judicial authorities, public administrations and supervisory and control authorities.

The entities belonging to the categories listed above may operate, depending on the circumstances, as data processors (and in this case they will receive appropriate instructions from the Controller) or as separate data controllers. In the latter case, Personal Data will only be communicated with the express consent of the data subjects, except in cases where communication is mandatory or required by law or to pursue purposes for which the data subject's consent is not required by law.

These entities may be established in countries within the European Economic Area (EEA) and outside the EEA. In particular, when these entities are established in non-EEA countries, the Controller adopts the measures provided for by the Regulation to legitimize the transfer of personal data to them, such as the signing of standard contractual clauses issued by the European Commission.

The list of entities to whom data is or may be communicated, as well as details of measures adopted to legitimize transfers outside the EEA, can be obtained by contacting the Controller at the addresses provided in paragraph 7 below.

#### **7. What rights can be exercised with regard to Personal Data?**

At any time, where applicable, Attendees have the right to:

- obtain from the Controller confirmation as to whether or not Personal Data are being processed and, where that is the case, access to the information referred to in Article 15 of the Regulation;
- obtain the rectification of inaccurate Personal Data concerning them or, taking into account the purposes of the processing, have incomplete Personal Data completed;
- obtain the erasure of Personal Data where one of the grounds referred to in Article 17 of the Regulation applies;
- obtain the restriction of processing of Personal Data where one of the grounds referred to in Article 18 of the Regulation applies.

Attendees also have the right to object to the processing of Personal Data relating to the Recordings.

These rights may be exercised by sending an email to [info@choruslife.com](mailto:info@choruslife.com) or to the Data Protection Officer at [dpo@choruslife.com](mailto:dpo@choruslife.com).

Pursuant to the Regulation, the Controller is not entitled to charge a fee for complying with one or more of the requests set out in this paragraph, unless they are manifestly unfounded or excessive, and in particular have a repetitive character. Where the Attendee requests more than one copy of his/her personal data or where requests are excessive or unfounded, the Controller may (i) charge a reasonable fee, taking into account the administrative costs incurred to process the request or (ii) refuse to act on the request. Under these circumstances, the Controller will inform the Attendee of the costs, prior to processing the request. The Controller may ask for additional information prior to processing the request, should it need to verify the identity of the individual making the request.

The exercise of these rights may, in any case, be delayed, limited or excluded. The Attendee shall be informed in writing of the limitation and the reasons for it without delay, unless such notification would compromise the purpose of the limitation. Such restrictions may be imposed only to the extent and for the duration necessary as a proportionate measure, taking into account the Attendee's fundamental rights and legitimate interests, to safeguard potential interests in conducting a defensive investigation or exercising legal rights in court (including related preliminary activities). In such instances, the data subject may also exercise their rights by lodging a complaint with the Data Protection Authority ("Garante per la protezione dei dati personali").

Without prejudice to any other administrative or judicial remedy, the Attendee also has the right to lodge a complaint with the Garante if they believe that the processing concerning them is carried out in violation of the Regulation. Further information is available on the website <http://www.garanteprivacy.it>.

The Controller, in any case, invites the Attendee to make direct contact through the channels indicated above, before approaching the Garante, in order to amicably resolve any dispute regarding personal data protection in the shortest possible time.