

PRIVACY POLICY REGARDING EVENTS AT CHORUS LIFE ARENA

Pursuant to the European Data Protection Regulation No. 2016/679 (the "**Regulation**"), the Controller hereby informs participants in events held at the Chorus Life Arena (the "**Participants**" and the "**Event**," respectively) of how personal data collected by the Controller, as defined below, or from third parties (including providers of resale services or pre-sale of tickets to the Event) will be processed.

1. Who is the Controller?

The joint controllers for the purposes listed in paragraph 3 below (collectively the "**Controller**") are identified as follows:

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

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

and

Chorus Life Arena 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. 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 are (i) the first name, last name, e-mail address, the event purchased, as well as any additional data related to the Event, and (ii) if the Participant provided his consent to a third party to disclose the data to the Controller for marketing purposes, also the contact data, such as the e-mail address (the "**Personal Data**" or the "**Data**").

In addition, the Controller may process images transmitted or recorded by video surveillance systems, in accordance with the information on video surveillance available at the following link www.choruslife.com/en/informativa-videosorveglianza, as well as data relating to photographic and/or audio-video filming taken during the Event, in accordance with the information on filming available at the following link www.choruslife.com/en/informativa-riprese.

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

A. If the Controller is the organizer of the Event, it processes Personal Data for all purposes related to the conduct of the Event and to ensure access to and enjoyment of the Event for Participants. This purpose is based on the contract concluded between the Controller and the Participant, through the latter's purchase of the access ticket. The processing of Personal Data for this purpose is mandatory in order to ensure Participants' enjoyment of the Event. Failure to provide it will result in the inability to fulfill contractual obligations to the Participant.

B. Whether the Data Controller is the organizer of the Event or not, the Controller may process Personal Data for the purpose of sending promotional and commercial communications regarding events, news, products and/or services of the Chorus Life smart district and, more generally, of the Chorus Life group and/or third party partners of the Chorus Life group. Such processing is based on the prior consent given by the data subject directly to the Controller or to third parties for the communication of their data to the Controller for marketing purposes. The processing of Personal Data for this purpose is optional, as the absence of consent does not affect the Participants' enjoyment of the Event, but results in the non-receipt of commercial and promotional communications. The Data Subject may revoke his or her consent at any time, without affecting the lawfulness of the processing based on the consent given prior to revocation, by contacting the Controller as indicated in Section 7 below.

The Participant'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?

In the context of the purpose referred to in letter A) of item 3 above, Personal Data shall be retained for a period of time no longer than is necessary to achieve the purposes for which it is processed and, in any case, following the Event, for the entire ten-year ordinary limitation period under the law, except where retention for a further period is necessary under provisions of the law or to defend a right or interest of the Controller.

In the context of the purpose referred to in B) of item 3 above, Personal Data shall be retained until consent is revoked by the data subject with the understanding that the Controller will adopt procedures to make the Participant aware of his rights, including the right to manage (and thus also revoke) consent. In any case, in the absence of interaction between the Participant and the Controller for a period of 24 months, the processing under consideration will be discontinued. In such circumstances, in the absence of any further legal basis, the data will be deleted or anonymized.

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 Controller's authorized personnel and may be communicated solely and exclusively for the purposes indicated above and, where necessary, to the following categories of persons:

- companies belonging to the Chorus Life Group;
- providers of IT services and resale of event admission tickets;
- persons, companies, associations or professional firms that provide assistance and consulting services or activities or provide services to the Holder, with particular but not exclusive reference to issues in insurance, accounting, administrative, legal, tax and financial matters;
- companies that provide services related to security, support in access control, technical support including for video surveillance systems;
- to third-party companies, in case of any corporate events.

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, Participants 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.

Participants 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 or to the Data Protection Officer at 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 Participant 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 Participant 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 Participant 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 Participant'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 Participant 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 Participant 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.