

**PRIVACY NOTICE PURSUANT TO ART. 13 OF THE REG. (EU) 2016/679 ("GDPR") ON THE DATA PROCESSING RELATED TO  
PHOTO/VIDEO SHOOTING AND ONLINE SHARING**

Veronafiere provides with the information concerning the processing of personal data and, in particular, of images of people attending specific events in which photos are then shared on an online platform.

**1. Data controller**

Data controller is Veronafiere S.p.A., Viale del Lavoro, 8, 37135 - Verona, tel. 045 8298111, email address [info@veronafiere.it](mailto:info@veronafiere.it), PEC address [mail@pec.veronafiere.it](mailto:mail@pec.veronafiere.it) (hereinafter referred to as "Veronafiere" or "Controller")

**2. Data Protection Officer (DPO)**

You can contact the DPO at the email address [dpo@veronafiere.it](mailto:dpo@veronafiere.it)

**3. Data processing purposes, legal basis and data retention**

Image may be processed, as highlighted by special signs *in loco*, as Veronafiere (or third parties appointed by the latter) will take photos and film videos.

WHY IS PERSONAL DATA BEING PROCESSED?	WHAT IS THE BASIS THAT MAKES THE PROCESSING LAWFUL?	HOW LONG DO WE KEEP PERSONAL DATA?
(1) To <b>document - for archiving purposes - the event</b> with photo/video shooting (which may incidentally include images of people participating in the event).	The legitimate interest pursued by the Controller, which – as assessed through the "balancing of interests" referred to in Art. 6.1, lett. f) GDPR – overrides the interests, rights and freedoms of the data subject.	<b>For 5 years.</b> Except for extraordinary circumstances that justify its extension (for example relating to the public relevance of the event and/or the characters portrayed).
(2) To <b>document – for commercial purposes - the event</b> with photo/video shooting (which may incidentally include images of people participating in the event). This includes <b>publication and dissemination</b> through the Data Controller's official communication channels, such as the institutional website and social media platforms (e.g., Facebook, Instagram, LinkedIn).	The legitimate interest pursued by the Controller, which – as assessed through the "balancing of interests" referred to in Art. 6.1, lett. f) GDPR – overrides the interests, rights and freedoms of the data subject.	For as long as necessary to achieve the purposes for which the data are processed, and, in any case, until data subject's objection.
(3) To <b>upload photos of the event on an online platform</b> . Those photos will not be made public but will be accessible only to the people who attended the event and have been given the QR-Code (which will be available at the event) and that will register to the online platform. Every person will be able to access only the photos in which he or she is portrayed. For more information please refer to: <a href="https://memento.photo/legal/privacy-policy">https://memento.photo/legal/privacy-policy</a>	The legitimate interest pursued by the Controller, which – as assessed through the "balancing of interests" referred to in Art. 6.1, lett. f) GDPR – overrides the interests, rights and freedoms of the data subject.	<b>For 6 months.</b> Except for extraordinary circumstances that justify its extension.
(4) To <b>identify the subject portrayed in the photos</b> , in order to let him access only the photos in which he or she is portrayed via the online platform. This process is obtained by a voluntary submission of a username, an email and a biometric template (face image) via the online platform, that allows the matching between the face of the subject and the photos uploaded.	The <b>consent</b> of the Data Subject.	<b>For 6 months.</b> Except for extraordinary circumstances that justify its extension.

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For more information please refer to:  
<https://memento.photo/legal/privacy-policy>

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Once such data retention period has expired, data will be destroyed or anonymized, compatibly with the technical timing for erasure and backup.

#### 4. The provision of data

The processing of images is not mandatory. As set out in the event terms and conditions, visitors may object to the photo/video shooting by informing Veronafiery (also in the person of the operator in charge); this will not preclude the participation in the event.

#### 5. Categories of recipients to whom data may be disclosed

Data may be disclosed to parties acting as Controllers (e.g. public authorities, professional firms) or processed, on behalf of Veronafiery, by third parties, appointed as Data Processors pursuant to art. 28 GDPR, such as companies providing security and surveillance services and/or facilities' maintenance services, subject in charge of photo/video shooting, the owner of the platform on which the images will be uploaded (Memento SAS).

Furthermore, data are processed by Veronafiery employees who have been expressly authorised to process such data for the above-mentioned purposes and have received adequate operating instructions.

#### 6. Transfer of personal data to countries outside the European Union

Your Data may be transferred outside the European Union (e.g. within the Controller's collaboration with selected IT partners). If Data are transferred to countries outside the European Union (EU) or the European Economic Area (EEA) and which have not been deemed adequate by the European Commission, and whenever the transfer is not necessary for the performance of the contract, the "transfer tools " referred to in Article 46 of the GDPR will be adopted, with the possible provision of "additional measures" which ensure a level of protection substantially equivalent to that required by European Union law.

#### 7. Data subjects' rights

Data subject shall have the following rights, as well as any right under GDPR:

- to access data concerning him/her in accordance with Article 15,
- to obtain the rectification of inaccurate data,
- to have incomplete data completed,
- to obtain the erasure of data in the cases provided for by Article 17,
- to obtain restriction of processing in the cases provided for by Article 18.

In order to exercise his/her rights, data subject can contact the Controller by sending a written communication to the address pointed out in par. 1 or an e-mail to [privacy@veronafiery.it](mailto:privacy@veronafiery.it).

In any case, data subject shall have the right to lodge a complaint with the competent supervisory authority in the Member State of his or her habitual residence, place of work or place of the alleged infringement.

#### 8. Events in the USA

For events taking place in the United States, we comply with applicable state regulations, including the Biometric Information Privacy Act (BIPA) in Illinois and the California Consumer Privacy Act (CCPA/CPRA) in California.

If biometric processing is used to organize or distribute event photos, the following principles apply:

- **Purpose limitation:** Biometric data is processed only for the purpose of identifying and delivering to the rightful users who have explicitly requested it.
- **Transparency, Consent and rights:**
  - In compliance with BIPA, biometric processing with the purpose of identifying individuals is performed exclusively on the basis of prior information and consent from the concerned individuals.
  - Biometric information is considered sensitive personal information under the CCPA/CPRA. Individuals are informed of its use and retain the right to request access, deletion, or to limit its use.
- **No sale or sharing:** Biometric information is never sold, leased, traded, or otherwise profited from. It is not shared with third parties except as strictly necessary to provide the service.
- **Retention and deletion:** Biometric data is retained only for the duration of the event and a short operational period thereafter, then securely deleted.
- **Security measures:** We implement appropriate technical and organizational measures to protect biometric data against unauthorized access, disclosure, or misuse.

This section complements our general privacy notice and prevails in case of events taking place in the United States.

*Last update: September 2025*