

PARTICIPANTS PRIVACY NOTICE

Information on the processing of personal data pursuant to Article 13 of Regulation (EU) 2016/679

Why this Notice?

The following information is provided in order to offer a clear and transparent overview of which personal data are processed in the context of the organization of the Event “**CLEAR CORRECT 20TH ANNIVERSARY IN BRUSSELS**” (hereinafter, the “Event”), in compliance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (hereinafter, “GDPR” or the “Regulation”).

The data subjects of the processing activities are the individuals participating in the Event.

1. DATA CONTROLLER

ClearCorrect, 21 Cypress Blvd - Round Rock (USA), part of the Institut Straumann AG group – Peter-Merian Weg 12 – Basel (Switzerland), represented by its legal representative pro tempore, is the Data Controller of the personal data collected in connection with the Event.

2. DATA PROCESSOR

The Data Controller has entrusted GDS Communication S.r.l., represented by its legal representative pro tempore, with the operational management of the following activities: management of Event registrations, photo and video recording, coordination of the direction, management of the contracting of catering, venue and technical services related to participation in the Event, appointing the same as Data Processor pursuant to Article 28 of Regulation (EU) 2016/679 (GDPR) and providing the relevant operating instructions.

For any communications, the reference email for GDS is: info@gdscom.it

3. CATEGORIES OF DATA AND PURPOSES OF PROCESSING

The data provided by you at the time of registration, through the completion of a digital form, are: **identifying data** (first name, last name, address, city, country); **contact data** (email address; telephone number); **company-related data** (tax data for invoicing); **health-related data** such as food intolerances; and **images and/or audio-video recordings**.

Such data will be processed by the Data Controller pursuant to Article 6 of the Regulation for the following purposes of processing:

- a) **Management of registration and consequent participation in the Event:** the processing of your personal data is carried out for the performance of instrumental and functional activities;
- b) **Management of instrumental and functional activities for the performance of the contractual and/or pre-contractual relationship** (invoicing);
- c) **Enhancement and storytelling of the Event contents:** the processing of images and/or audio-video recordings, on audio-visual media, social networks and on any other tool and/or medium intended for the dissemination of data, is carried out for the purpose of promoting and publicizing the Event directly by the Data Controller or through third parties authorized for this purpose, who will be appointed as data processors.

4. LEGAL BASIS OF PROCESSING

Pursuant to Article 6 of Regulation (EU) 2016/679, the conditions of lawfulness for the processing of your personal data in relation to the specific purposes described in this privacy notice are the following:

-**Management of the registration request and consequent participation in the Event** (Article 6(1)(f) GDPR) by the data subject and subsequent management thereof (purpose a);

-**Performance of pre-contractual and contractual measures** (Article 6(1)(b) GDPR) in relation to the management of registration and consequent participation in the Event (purpose b);

-**Free and explicit consent** (Article 6(1)(a) GDPR) for the use of your image for the purpose of storytelling of the Event contents (purpose c).

What happens if you do not provide your data?

Failure to provide your personal data for the purposes of organizational management of the Event referred to under letters a) and b) will make it impossible for the Data Controller to process your request to participate in the Event.

Should you not wish to consent to the processing of your image for the purposes referred to under letter c), the Data Controller will adopt appropriate measures to allow you to participate in the Event in any case.

If you have provided consent and subsequently revoke it or object to the dissemination of your image, the effects of the revocation will take effect from the date of receipt of your request and the Data Controller will be required to certify the removal of the data of the photographs and/or audio-video recordings subject to revocation, provided that deletion or removal of such data from websites is not impossible or particularly complex and burdensome (for example: data saved by third parties on their own devices or other media, or used for publication on social networks). In such circumstances, the Data Controller may not be held liable. It is understood that revocation will not affect processing already carried out.

5. METHODS OF PROCESSING AND DATA RETENTION PERIODS

Within the scope of the processing of your personal data, the Data Controller undertakes to ensure that the information and data collected and used are adequate, relevant and limited to what is necessary with respect to the purposes of processing described above and that they are processed in a manner that ensures their security, including through appropriate and effective technical and organizational measures implemented by the Data Controller, in compliance with the principle of accountability imposed by the GDPR, which prevent the risk of loss, unauthorized access, unlawful use and dissemination of such data.

For these purposes, the Data Controller provides procedures for the management of personal data breaches (data breach) in compliance with the legal obligations to which it is subject.

The acquisition of your identifying and contact data necessary for the completion of the registration form takes place through an IT infrastructure developed and managed by GDS Communication S.r.l., duly instructed and appointed for this purpose as Data Processor pursuant to Article 28 of the GDPR.

The latter will also acquire your image and possibly your voice for the creation of audio/video recordings commissioned by the Data Controller. Within 30 days from the end of the Event, GDS Communication S.r.l. will transfer the photos and videos produced to the Data Controller on electronic media and will delete them from its own systems.

The images, once acquired by the Data Controller, will be stored, in compliance with the authorization received, for the 12 months following their collection, taking into account the clarifications indicated in the previous paragraph, purpose c).

The information collected by the Data Controller is stored for the time necessary to carry out the activities related to the management of the contract and up to ten years following its conclusion or from when the rights arising therefrom may be asserted (pursuant to Articles 2935 and 2947 of the Italian Civil Code); as well as for the fulfillment of obligations (e.g. tax and accounting obligations) that remain even after the conclusion of the contract (Article 2220 of the Italian Civil Code), for which purposes the Data Controller retains only the data necessary for their fulfillment.

The data are stored in IT archives located within the European Economic Area and adequate security measures are ensured.

The management of the participation fee and the collection of payment-related data (identifying data and credit card data) are carried out by **Stripe LLC**, 354 Oyster Point Blvd, South San Francisco, CA 94080, USA, appointed and instructed for this purpose as Data Processor. By accessing the Stripe platform, you will accept the terms and conditions provided by the same.

6. SCOPE OF COMMUNICATION AND DISCLOSURE OF DATA

Your personal data may be accessed by internal staff of the Data Controller responsible for managing the Event and all related activities. Such individuals, who are instructed by the Data Controller pursuant to Article 29 of the Regulation, will process your personal data exclusively for the purposes indicated in this privacy notice and in compliance with applicable legislation.

Your personal data may also be accessed by third parties who may process personal data on behalf of the Data Controller as Data Processors pursuant to Article 28 of the Regulation, such as GDS Communication S.r.l. and **Stripe LLC**, 354 Oyster Point Blvd, South San Francisco, CA 94080, USA, for the activities assigned to them. You have the right to obtain from the Data Controller a list of the appointed data processors by submitting a request to the contacts indicated in the following paragraph.

7. DATA PROTECTION OFFICER

The Data Protection Officer (DPO) is the individual appointed by the Data Controller pursuant to Article 37 of the GDPR, who carries out support activities in ensuring compliance with European and national legislation on the protection of personal data, with a legal profile and multidisciplinary skills, whom you may contact, if necessary, for all matters relating to the processing of your data and for the exercise of the related rights in the manner described in the following paragraph.

You may contact the Data Controller's DPO at: datainquires.us@straumann.com

You may contact the Data Processor's DPO at: dpo@gdscom.it

8. YOUR RIGHTS

As a "Data Subject", you have the right to obtain from the Data Controller, in the cases provided for: access to the collected data, rectification, erasure, restriction of processing, and withdrawal of consent. Data subjects may object to processing, for reasons related to their particular situation, in cases of the Data Controller's legitimate interest (Articles 15 et seq. of Regulation (EU) 2016/679).

The request for the exercise of rights related to the processing of personal data may be submitted jointly or separately to the Data Controller's Data Protection Officer (where appointed) at the email addresses indicated above, attaching the appropriate request, or by using the completed form downloadable from the institutional website of the Italian Data Protection Authority, at the following link:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

The exercise of such rights is free of charge pursuant to Article 12 of the Regulation, without prejudice to cases of manifestly unfounded or excessive requests, to which paragraph 5 of the same Article applies.

The Data Controller will respond to your request without undue delay and, in any case, within one month of its receipt. This period may be extended by a further two months where necessary, taking into account the complexity or number of requests; in such case, you will be informed of the reasons for the delay.

You will also have the right to lodge a complaint with the Data Protection Authority or to bring proceedings before the competent judicial authorities if you believe that the processing of your personal data is carried out in violation of the Regulation (Articles 77 and 79 GDPR).