

## **PRIVACY POLICY ON DATA PROCESSING FOR REGISTRATION AT CONFERENCES, SEMINARS AND TRAINING COURSES**

The Istituto di Ricerche Farmacologiche Mario Negri IRCCS, tax code/VAT no.03254210150, headquartered in Via Mario Negri 2, (Milan, Italy), in the person of its legal representative Prof. Giuseppe Remuzzi, as Director, (“MNI” or “IMN”) wishes to inform you that, for the purposes of: (i) Italian Legislative Decree no. 196 of 30 June 2003, the Privacy Code; (ii) EU Regulation 2016/679 on the ‘*Protection of natural persons with regard to the processing of personal data, and on the free circulation of such data*’, the GDPR, art.13; and (iii) Italian Legislative Decree no. 101 of 10 August 2018, for the adaptation of national legislation to the GDPR, jointly termed the Privacy Policy, some obligations are set forth on the subjects carrying out the processing – intended as ‘*the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction*’ – of personal data referring to other subjects (the “Processing”).

The MNI is obliged to provide you with the following detailed information.

### **A) Data Controller and Data Protection Officer**

The Data Controller decides how and why the personal data should be treated, and is represented by Prof. Giuseppe Remuzzi, Director of the Mario Negri Institute for Pharmacological Research, IRCCS, with head office in Via Mario Negri 2, 20156 Milano, Italy: e-mail [privacy@marionegri.it](mailto:privacy@marionegri.it).

The Data Protection Officer (DPO) can be reached at the following e-mail address: [DPO@marionegri.it](mailto:DPO@marionegri.it)

### **B) Categories of personal data**

The following data may be acquired for conferences, seminars and training courses:

- a) identifying data, i.e. personal and contact details provided by the person concerned when registering for events such as training courses, seminars, conventions or other, organized by the MNI;
- b) Images and films, video clips, sound recordings and photographs that reproduce the participating subjects individually or in groups.

### **C) Purposes and legal basis of the processing**

- a) To formalise the registration at the event and related fulfilments, established by law, of the obligations for the administrative and organizational management of the event: non-treatment implies the MNI will be unable to proceed to this effect.

*Legal basis:* execution of the contract to which each member is a party, or to the pre-contractual measures adopted at their request (art. 6 parag. 1 of the GDPR).

*Data retention period:* your personal data are stored in the MNI's personal data records according to the modalities described above for a period of 10 years from the date of registration at the event.

- b) To provide information about the MNI's initiatives: lack of consent has no effect on participation in the event for which the person registers;

*Legal basis:* to respond to a request from the data subject, for which consent was expressed (art. 6 parag. 1(a) of the GDPR).

*Data retention period:* your personal data are stored in the MNI's personal data records and they are deleted as a result of the revocation of freely expressed consent.

- c) To document and disseminate information on activities and events held by the MNI, considered to be of particular interest: in order to promote the spirit of MNI, the Data Controller may collect and publish images of you on the Institute's website, on social media (e.g.: Facebook, Instagram, Twitter) or on any other form or means of transmission, without acknowledging any compensation.

*Legal basis:* to respond to a request from the data subject, for which consent was expressed (art. 6 parag. 1(a) of the GDPR). The consent to the collection and publication of photos/ videos is considered legitimately provided by the interested parties if, informed about the methods and purposes of processing, they participate in events or activities proposed by the Institute.

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Data retention period: the images may be stored in the Data Controller's databases, and they are deleted as a result of the revocation of freely expressed consent, without prejudice to publication on the website, social media or on printed publications

- d) Assigning credits to ECM activities In relation to participation in accredited (residential or distance) training projects: self-certification of the identity and professional status of members, issuance of the certificate of participation for ECM purposes if required, sending e-mail communications related to the teaching activity carried out.

*Legal basis*: to carry out the preliminary and consequential activities of registering for an ECM accredited event, as well as the management and provision of the service itself and the respect of legal obligations (art. 6 par. 1 (b) and (c) of the GDPR).

*Data retention period*: the data certifying participation in a course with ECM accreditation will be kept available to the Authorities, in case of verifications, for 5 years from the end of the event.

#### **D) Data processing methods**

For the purposes set out above, data will be processed in compliance with the security measures set out in art. 32 of the GDPR, using automatic and/or manual informatic and telematic tools, to memorize, manage and transmit the data with the sole purpose of pursuing the aims for which the data were collected, always in full respect of the principles of correctness, permission and transparency.

#### **E) To whom your data may be communicated**

Personal data will not be disseminated in any way, and will not be made available to unnamed subjects, in any possible form, even only for consultation. The data may, however, be made available to certain subjects, in full respect of all legal requirements, for purposes closely linked to the execution of contractual obligations. Your data may therefore be accessible to:

- employees and other persons working for the Institute, if 'authorised' or 'designated' for processing, or system administrators,
- professionals/ consultants and/or other external subjects working for the Institute on an outsourcing basis with technical or other support tasks, in their areas of competence. These subjects may in certain circumstances serve as independent external data controllers or processors, nominated by the Institute Data Controller.

In addition, and without your consent (under arts 6b and c of the GPDR, the Institute may communicate your data to judicial bodies, security organisations, and any other subjects (eg, labor inspectors, health offices, pension and related bodies, banks, insurance companies, unions and members' assistance offices) to which this information has to be communicated, by law, for their specific purposes. These subjects will process the data as independent data processors.

#### **F) Data transfer to other countries or to an international organisation**

Your personal data are processed in the European Union and stored on servers there. However, should it be necessary the Data Controller may transfer the data to a third country or international organisation and/or move to servers outside the EU. The Data Controller will take all necessary measures to ensure this transfer is made in full respect of articles 44 et seq. of the GDPR.

#### **G) Data storage policies**

The Institute will store all personal data in a form that enables the subject to be identified as promptly as required for the purposes for which they were processed. Your data will therefore be stored as follows:

- a) for the whole duration of the work and for ten years thereafter, in order to comply with regulations or contractual conditions, including any current civil and tax law requirements;
- b) beyond the terms of point a), when necessary data will be stored as long as needed for defence of rights in a trial in court, or in relation to the risk of any specific occupational disease.

#### **H) Rights of the data subject**

The Institute informs you that, as required by current regulations on the protection of personal data, you may exercise the following rights at any time, infine, under arts. 15-22 of the GDPR – asking the Data Controller:

- a) to confirm whether your personal data are being processed and if so to obtain access to it;

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- b) for rectification of any erroneous personal data, or integration of incomplete items;
- c) for cancellation of data with no unreasonable delay if any of the following apply:
- the data are no longer needed for the purposes for which it was collected or processed;
  - you revoke the consent to processing your data if there are no other legal grounds for processing it;
  - the personal data were processed illegally;
  - the cancellation is necessary for some legal obligation under EU or national law;
  - you are opposed to the processing and there is no legitimate need to proceed, or you are opposed to it under art. 21, para. 2, of the GDPR (personal data processed for purposes of *direct marketing*);
- d) to limit the processing if there is any erroneous data (for the time the Data Controller requires to check that the data are correct), or the processing is illegal and/or the data subject has opposed the processing, asking for it to be limited;
- e) for a portable copy: you have the right to receive a portable copy, in a common format, legible with an automatic device, and to transmit to another Data Processor, only for data based on consent and which have been processed automatically;
- f) to oppose processing of your own data, unless the Data Processor demonstrates the existence of legitimate reasons for proceeding;
- g) to revoke your consent at any time if the processing was based on your explicit consent, without prejudicing the lawfulness of processing done before your revocation.
- h) You have the right lodge a complaint with the authority responsible for these matters in the Member State where you normally live or work, or where the presumed violation occurred, without prejudice to any other administrative or judicial recourse, in case of violation of the Regulations.

If you want any further information on how your personal data will be processed, and to exercise your rights, you can **write to the Data Controller or the Data Protection Officer as indicated in section A** on Data Processing and Protection. Queries regarding your data will be answered as soon as possible – in any event within 30 days – unless it is not feasible or requires an unreasonable amount of work. If there is likely to be a delay, or it is not possible to answer your complaint, you will receive a full explanation.

Document available at this link:

[http://www.marionegri.it/media/privacy/Informativa\\_privacy\\_trattamento\\_dati\\_eventi\\_convegni\\_ENG.pdf](http://www.marionegri.it/media/privacy/Informativa_privacy_trattamento_dati_eventi_convegni_ENG.pdf)

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