

**Privacy policy statement relating to the event  
pursuant to article 13, Regulation (EU) 2016/679 (“GDPR”)  
General Data Protection Regulation**

This privacy policy statement deals with the processing of personal data by Emilceramica S.r.l. a Socio unico (“**Data Controller**” or “**Emilceramica**”) in order to register you for the event “60th Emilgroup Anniversary” (the “**Event**”), which it is planning to hold from 27.09.2021 to 01.10.2021

**1. Identity of the Data Controller and Data Protection Officer (DPO)**

The Data Controller is Emilceramica S.r.l. a Socio Unico, with registered office at Via Ghiarola Nuova 29, 41042 Fiorano Modenese (Modena) Italy, acting through its duly authorised representative pro tempore.

To exercise your rights, or for any information concerning them and/or this Privacy Policy Statement, you can contact the Data Controller at: [privacy@emilceramicagroup.it](mailto:privacy@emilceramicagroup.it) tel. +39 0536 835111.

The Data Controller has appointed a Data Protection Officer (“**DPO**”), with whom you can get in touch to exercise your rights, as listed in point 6 below, as well as to receive any information concerning them and/or this Privacy Policy Statement, by writing to: [dpo@emilceramicagroup.it](mailto:dpo@emilceramicagroup.it).

**2. Type of personal data we process**

The Data Controller intends to process your ordinary personal data, which you gave us directly, such as:

- your personal data (name, surname);
- your contact details (telephone number, email address).

If you consider it advisable, in order to take part in the Event or the final dinner, you can also provide us with any special data pursuant to art. 9 of the GDPR (e.g. food intolerance, special diet, difficulties with walking, etc.).

**3. Purposes of processing, legal basis, nature of processing and data storage period**

The Data Controller will process your personal data for the following purposes:

- (i) to register you for the Event: your ordinary personal data will be collected and processed by the Data Controller so that you can be registered for the Event and later identified when you access the premises hosting the Event; we also require these data to get in touch with you. The legal basis of the processing, with reference to these purposes, is the legitimate interest pursued by the Data Controller, as defined in art. 6, first paragraph, subsection f) of the GDPR, that is, the need to satisfy your request to be registered and to take part in the Event. In order to be registered and to take part in the Event, you are obliged to provide us with your personal data and if you fail to do so, or later object to the processing of such data, the Data Controller will be unable to permit you to take part in the Event. For these purposes, your personal data will be stored from the time you are registered until the conclusion of the Event, when they will be erased by the Data Controller within a period of 3 months;
- (ii) for marketing purposes: the Data Controller will process your contact data in order to send you marketing and/or promotional communications concerning its products, to invite you to exhibitions and/or events, and to keep you informed about other initiatives which it organises. The Data Controller may process your personal data for the aforesaid marketing purposes by direct contact (e.g. e-mail, telephone

contact with operator or paper mail) and/or by automated means (e.g. automated email campaigns, text messages, automated telephone contact, instant messaging, social media, etc.). The legal basis of the processing of your personal data for this purpose is your consent, under article 6, first paragraph, subsection a) of the GDPR. The provision of personal data for this processing purpose is optional and if you refuse, your ability to take part in the Event will not be affected, but the Data Controller will be unable to contact you and/or to send you marketing communications, invite you to events, or generally keep you updated on the latest news regarding its products. For these purposes, your data will be kept by the Data Controller until you exercise the right to withdraw your consent;

(iii) to handle any special requests you make regarding your personal data: if you consider it advisable, in order to take part in the Event or the final dinner, to provide us with any special data pursuant to art. 9 of the GDPR (e.g. food intolerance, special diet, difficulties with walking, etc.), the Data Controller will process the information in order to take on and deal with your particular request. The legal basis of the processing of your personal data by the Data Controller for this purpose is your explicit consent, under article 9, first paragraph, subsection a) of the GDPR. The provision of your particular personal data or giving of explicit consent pursuant to art. 9 of the GDPR is optional, but if you refuse to provide them, the Data Controller will be unable to deal with your requests for that purpose. For these purposes, your personal data will be stored from the time you are registered until the conclusion of the Event, when they will be erased by the Data Controller within a period of 1 month.

#### **4. The procedures used to process your personal data**

Your personal data will be processed, in compliance with the provisions of the GDPR, by paper, IT and telematic means, adopting methods that guarantee security and confidentiality in accordance with the provisions of article 32 of the GDPR.

#### **5. The parties to whom your personal data may be disclosed, and who may gain knowledge of them**

In the pursuit of the purposes described in paragraph 3, your personal data will be known to the Data Controller's employees, contract staff and working associates, specifically designated to deal with processing.

Moreover, in the pursuit of the aforesaid purposes, your personal data may be processed by third parties belonging, for example, to the following categories:

- third parties providing event organisation services;
- third parties providing communication and messaging services;
- third parties providing services for the management of the Emilceramica IT system, Internet and Intranet sites and telecommunications networks;
- third parties providing food and catering services;
- third parties providing transportation services;
- third parties providing hotel services;
- other service providers
- other companies belonging to the same group of companies as Emilceramica, or linked to Emilceramica, or the parent company Mohawk Industries.

The entities in the aforesaid categories operate in some cases as Data Processors specifically designated by the Data Controller in accordance with article 28 of the GDPR, and in other cases, fully independently as

separate Data Controllers, in which case your personal data will only be disclosed to the said independent data controllers for the purposes referred to in point 3 above.

The complete, updated list of the entities to which your personal data may be disclosed can be requested from the Data Controller's registered office.

For technical and organisational purposes, your data may be transferred to non-European Union member states: this transfer is, in any case, lawful since it is covered by adequacy decisions issued by the European Commission and/or standard data protection clauses based on the models adopted by the European Commission pursuant to art. 46 of the GDPR. You may request a copy of the safeguards adopted for transfer of your personal data outside the EU, and information concerning the places where they have been made available, by sending a specific request to the Data Controller at the email address [privacy@emilceramicagroup.it](mailto:privacy@emilceramicagroup.it).

## 6. Your rights as data subject

With regard to the data processing described in this Privacy Policy Statement, as data subject, subject to the conditions set out in the GDPR, you may exercise the rights provided by articles 15 - 21 of the GDPR, in particular:

- **right of access** - article 15 GDPR: right to obtain confirmation of whether or not personal data concerning you are being processed and, if this is the case, to obtain access to your personal data - including a copy of them - and communication, amongst other things, of the following information:
  - a) purposes of the processing
  - b) categories of personal data processed
  - c) recipients or categories of recipient to whom they have been or will be disclosed
  - d) data storage period or the criteria used
  - e) rights of the data subject
  - f) right to lodge a complaint with the supervisory authority
  - g) right to receive information on the origin of personal data if they have not been collected from the data subject
  - h) the existence of automated decision-making, including profiling, and significant information about the logic involved, as well as the envisaged consequences of such processing for the data subject;
- **right to rectification** - article 16 GDPR: right to obtain, without undue delay, the rectification of inaccurate personal data concerning you and/or the completion of incomplete personal data;
- **right to data portability** - article 20 GDPR: right to receive the personal data concerning you, which you have provided to the Data Controller, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance, if the processing is based on consent and is carried out by automated means. In addition, the right to have your personal data transmitted directly by the Data Controller to another controller, where technically feasible;
- **right to erasure (right to be forgotten)** - article 17 GDPR: right to obtain, without undue delay, the erasure of personal data concerning you, when:
  - a) the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - b) you have successfully objected to the processing of the personal data;

- c) you have withdrawn consent and where there is no other legal ground for the processing;
- d) the data have been unlawfully processed;
- e) the data have to be erased for compliance with a legal obligation;
- f) the personal data have been collected in relation to the offer of information society services referred to in article 8, comma 1 of the GDPR.

The right to erasure does not apply to the extent to which the processing is necessary for compliance with a legal obligation or for the performance of a task carried out in the public interest or for the establishment, exercise or defence of legal claims.

- **right to restriction of processing** - article 18 GDPR: right to obtain restriction of the processing, when:
  - a) the accuracy of the personal data is contested by the data subject;
  - b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead
  - c) the data subject needs the personal data for the verification, exercise or defence of a right during judicial proceedings;
  - d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.
- **right to object** - article 21 GDPR: right to object to the processing of personal data concerning you, unless there are legitimate grounds for the Data Controller to continue the processing;
- **right to withdraw consent**: the right to withdraw consent given, without prejudice to the lawfulness of processing based on consent before its withdrawal;
- **right to lodge a complaint with the supervisory authority pursuant to art. 77 GDPR**

The above rights may be exercised in relation to the Data Controller using the contacts provided in article 1 above. The Data Controller shall examine your request and shall inform you, without undue delay and in all cases within no more than one month of its receipt, concerning the action taken with regard to your request.

The exercise of your rights as data subject is free of charge in accordance with article 12 of the GDPR. However, in the event of requests which are manifestly unfounded or excessive, in particular because of their repetitive character, the Data Controller may charge you a reasonable fee taking into account the administrative costs of dealing with your request, or refuse to act on the request.

Please also note that the Data Controller may request further information necessary to confirm the identity of the data subject.

## **The Data Controller** **(Emilceramica S.r.l.)**