

# PRIVACY POLICY AND RELEASE OF PHOTO/VIDEO USE

# 1) PRIVACY POLICY

# (Article 13 of EU Regulation 2016/679)

Below we provide you with information regarding the processing of your personal data you have shared with HRC International Academy S.r.l.

## Data Controller

Your data will be processed, as Data Controller, by HRC International Academy S.r.l., with registered office in Rome (00144), Via della Sierra Nevada n. 108, Tax Code and VAT Number 14332251009 (hereinafter for brevity HRC).

We specify that "processing" of personal data, according to the Regulation, means any operation or set of operations, performed by HRC with or without the aid of automated processes and applied to your personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.

Through its initiatives, HRC offers its community Members the opportunity to participate in activities and events, both in-

person and online, within the Human Resources sector, allowing them to benefit from valuable networking and visibility opportunities.

For events that include a reception or refreshments at the conclusion of activities, participants may voluntarily inform the Data Controller of any intolerances or allergies when confirming their attendance. The Data Controller will not explicitly request such sensitive data in event registration forms; participants may voluntarily disclose this information. It is understood that, in the absence of such communication, HRC will still allow participation in the event but will not assume any liability for the presence of potential allergens in the food.

HRC will not share this information externally. Only anonymous dietary requirements will be communicated to the catering service provider.

#### Purpose And Legal Basis of The Treatment

HRC, also through its online and in-presence Events, aims to connect all those working in HR management by offering the opportunity to build professional relationships, to carry out benchmarking activities, to seek and/or to provide professional advice, to share business practices and video content, to get professional training and much more.

Your data, provided as part of your voluntary participation as **Participant** in the Event called "**BARCAMP Madrid**", that will take place on January 23, 2025 (hereinafter referred to as the "Event"), may be used by the Data Controller for the following purposes:

- a) To allow you to participate in the Event within the above-mentioned Event as Attendee;
- b) To allow you to access the catering services provided during the Event;
- c) To fulfill the obligations of law or regulations in force;
- d) To share and publish, free of charge, your name, surname, photos and/or images of you in general, as well as Event contents (images, videos, audios, work experience, excerpts, or recordings) within HRC's communication channels.
  - HRC's communication channels are the following:
    - Websites;

e)

- Social media (Facebook, LinkedIn, Instagram, YouTube, MYHRGoal.com, Learning Square, website);
- Other computers and print media.
  To receive commercial communications from the Data Controller.
- f) To transfer to third parties, in particular to Partners of the Event, your data (such as: name, surname, reference company, job title, email) so that the Partner may contact you to offer goods and/or services. It is understood as from now on that the Partner will treat your data as an autonomous data controller, so it may use your data to pursue its own purposes (you can see more information about the Event Partner on the site <a href="https://community.hrcigroup.com/es/eventi/hrc-barcamp-2025-espana/">https://community.hrcigroup.com/es/eventi/hrc-barcamp-2025-espana/</a>.
- g) To receive marketing communications from Indeed Ireland Operations Ltd, with its registered office at 124 Saint Stephen's Green, D02 C628, Dublin, Ireland. Your data will be transmitted to Indeed Ireland Operations Ltd, who may use it as an autonomous data controller for its own purposes, including commercial and marketing purposes. You may opt out of receiving such messages by following the unsubscribe link in the messages, or as indicated in Indeed's proposed Privacy Policy.

It is understood as of now that, with regard to the above treatments, referred to in letters **a**), **c**), the provision of personal data and the expression of your consent is necessary (Article 6 letter b) and c) of EU Reg. 2016/679 and subsequent additions), as any refusal determines the impossibility to take part in the Event. With regard to the communication of special categories of data (allergies or intolerances) for the purposes outlined in letter b), the legal basis is identified in Article 9, paragraph 2, letter e) of the GDPR.

With specific reference to the purpose referred to in paragraph **d**) of this statement, it is instead necessary to acquire specific authorization consent (Article 6 paragraph a) of Regulation (EU) 2016/679 and subsequent additions), which means the possibility of using your data, by the Data Controller, to share and publish, free of charge, your name, surname, photos and/or images of you in general, within HRC communication channels.

With specific reference to the purpose referred to in letter e) of this statement, it is instead necessary to acquire specific authorization consent (Article 6 letter a) of EU Reg. 2016/679 and subsequent additions), which means the possibility of using your data, by the Data Controller, to send you commercial communications. Please note that you can revoke your consent at any time, through the unsubscribe procedure within our DEM (Direct Email Marketing).

In relation to the purposes referred to in letter **f**) it is instead necessary the acquisition of specific authorization consent (Article 6 letter a) of Reg. EU 2016/679 and subsequent additions), which is understood with the possibility of transfer to the Partners of the Events of your data.

With regard to the purpose referred to in paragraph g) of this information notice, on the other hand, the acquisition of specific authorization consent is necessary (Article 6 paragraph a) of Regulation (EU) 2016/679 and subsequent additions), which is understood to mean the possibility of Indeed Ireland Operations Ltd using your data to send you commercial communications. Any failure to provide consent will result in the impossibility of receiving commercial communications from Indeed Ireland Operations Ltd.

## Type of Processed Data

The Data Controller will process the following types of data: Personal data: first name, last name, ID card number, cell phone number - optional - company of reference, job title, email, photos, video, and audio recordings, documentary content of the Event; special categories of data (food intolerances) for the purposes outlined in letter b).

#### Data Management

The processing of data will be carried out with manual and/or computer and telematic tools by authorized personnel and qualified to treat in accordance with the rules in force and the principles of correctness, lawfulness, transparency, relevance, completeness and not excessive, accuracy and logic of organization and processing closely related to the purposes pursued and in any case to ensure the security, confidentiality, integrity and availability of data processed, in compliance with organizational measures, physical and logical provisions.

## **Storage Times and Methods**

Your data will be stored at the headquarters of the Controller in paper and digital archives as follows:

- For the purposes outlined in letters a), c), and d) for a period of 3 years.
  - For the purposes outlined in letter b), only for the period necessary to allow you to access the catering services of the Event.
  - For the purposes referred to in letter f) and g) up to a maximum of 12 months and in any case until any revocation of consent.

At the end of the period specified above, your data will be deleted or anonymized.



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- External collaborators involved in the administrative/accounting management, in the capacity of external data processors, who operate on behalf of the Data Controller (for all the purposes specified above);
- Judicial and administrative authorities, for the fulfilment of legal obligations (for the purposes referred to in point (a);
- Partner of the Event.

#### Transfer of Data Abroad

Your personal data will not be transferred outside the European territory (EU).

#### **Rights of the Interested Party**

You will be able to exercise the rights under Articles 7 paragraph 3, 15, 16, 17, 18, 20, 21 and 77 of EU Reg. 2016/679 on the protection of personal data such as the revocation of data, the confirmation of their existence, the indication of the origin of the data, the purposes and methods of processing, updating, rectification, integration, portability, and the possibility to object to the processing.

This exercise may be carried out by making a request to the Data Controller through the e-mail address <u>dpo@hrcigroup.com</u>.

These permissions do not allow the use of my photographic image and / or audiovisual and my personal data in contexts that undermine the dignity personal dignity and decorum and in any case for a use and / or purposes other than those mentioned above and may be revoked at any time by making a request to the e-mail address dpo@hrcigroup.com.

## 2) RELEASE OF PHOTO/VIDEO USE

Pursuant to Articles 10 and 320 of the Italian Civil Code and Articles 96 and 97 of Law no. 633 of 22.4.1941, the copyright law, by giving your consent to the processing of your data for the purposes indicated in point **d**) of the privacy policy, you grant HRC permission to use your image (by way of example: photos, audio and video recordings) and to publish it on its communication channels, without any expectation of compensation or other remuneration. For the purposes of this release, communication channels are understood as: Facebook, LinkedIn, Instagram; Multimedia platform called MYHRGoal.com and other digital and printed media). The use of your image, for the aforementioned purposes, is authorized until the fulfilment of the purposes related to the event itself, or until the eventual revocation of your consent

In consideration of the circumstance that the aforementioned photo and video material, once made public, may be subject to acquisition and republication by third parties, even without HRC's consent, you release HRC from any prejudicial effect that may result from an abusive use by third parties of the aforementioned photo-video material.

# The use of your image is to be considered free of charge and will take place in compliance with the protections provided for by Regulation (EU) 2016/679, as indicated in the privacy policy statement above.

It is understood, as of now, that these authorizations do not allow the use of photographic and/or audiovisual image in contexts that undermine the personal dignity and decorum and in any case for a use and / or purposes other than those indicated in the privacy policy and can be revoked at any time by making a request to the e-mail dpo@hrcigroup.com.