

“Photographs and videos” privacy policy



1. Data Controller

STEMIN SpA with registered offices at Via Guglielmo Marconi, 67 24040 – Comun Nuovo (BG), Tax ID Code and VAT reg. no. 02681790164, hereinafter “Controller”, guarantees full compliance with data protection regulations, and provides the following information with regard to data processing, pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation – GDPR) and subsequent amendments.



2. Data processed, purposes and legal grounds for processing

All personal data provided to us on this occasion will be processed manually or using computerised means, in order to document attendance at events organised by the Controller and processing arising from legal obligations.

In particular, personal data, images and videos will be processed for the following purposes:

- publication of photographs in the Controller’s photogallery, on the Controller’s Facebook page and on Controller’s other computerised or hard copy means;
- Publication of photographs and videos on the Controller’s websites and social media channels, on websites belonging to third parties authorised by the Data Controller and using any other means and form of communication to the public, including print, cellphone, and/or other communication systems or technologies, useful for the promotion of Controller’s events, as well as through partner’s means of communication, connected to the initiatives of the Controller.

The legal basis that legitimises processing is consent, freely provided by the data subject.

Sede Legale e Amm e Unità Produttiva

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ISO 9001 **SGQ N°044MS:2116817**
ISO 14001 **SGA N°0044MS:2116819**
ISO 45001 **SCR N°044MS:2116818**



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Organizzazione con CFP Systematic Approach certificato da Bureau Veritas Italia Spa in conformità alla norma ISO 14067:2018



ISO 14064-1
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Dichiarazione di verifica IT330422-1 del: 21 marzo 2024 relativa all'inventario dei GHG rilasciata da Bureau Veritas per l'anno solare 2022



3. Nature of provision

The provision of personal data, insofar as regards processing as per the above point 2, is to be considered as optional for these purposes and therefore, any refusal will not make it impossible to take part in the initiative.



4. Processing locations and methods and data retention times

The data collected from the website are processed at the Controller's headquarters or at the premises of subjects authorised for processing.

Data collected will be processed using electronic or in any case, automated or computerised or telematic means, or using manual processing with logic strictly related to the purposes for which said personal data were collected and, in any case, in such a way as to guarantee the security of same.

The data collected will be stored in the Controller's archive to provide an historic memory of the events and corporate activities and, if necessary, for any periodical historic publications. Data will be retained for the time no longer than required for the purpose for which they were processed ("storage limitation principle", Art.5, EU Regulation 2016/679), or in compliance with the expiry set out in current standards or obligations set down by law.

In any case, the Data Controller implements rules that prevent permanent data retention and therefore, limits the retention time according to the principle of minimizing data processing.



5. Authorised subjects, data processors and data communication

The processing of data collected is performed by the Data Controller's internal staff, appointed for this purpose and authorised to perform processing according to specific instructions issued in compliance with current regulations.

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The data collected, within the limits pertaining to the purposes of processing stated and in the event it is necessary or useful for the execution of the purposes itself, can be processed by third parties appointed by external Processors, i.e., according to cases, communicated to those subjects necessary for the correct completion of the aims set out in point 2.

Moreover, the data collected can be processed by third parties with the qualification of autonomous Controllers, involved with the Controller in activities of an academic-didactic nature for the attainment of the aims set out in point 2 (for example, agreements regarding didactic projects, concerts, etc.).

The data collected can be provided, in the event of lawful request, solely in the cases envisaged by law, by the Legal Authority.



6. Data transfer to non-EU countries

Data collected will not be transferred outside of the European Union.



7. Data subject's rights

With regard to the personal Data communicated, the Data subject has the right to exercise the following rights:

- (Art. 7.3 Regulation EU 679/2016 – GDPR) withdrawal of consent;
- (Art. 15 Regulation EU 679/2016 – GDPR) accessing and asking for a copy;
- (Art. 16 Regulation EU 679/2016 – GDPR) requesting correction;
- (Art. 17 Regulation EU 679/2016 – GDPR) requesting deletion (“right to be forgotten”);
- (Art. 18 Regulation EU 679/2016 – GDPR) obtaining data minimisation;
- (Art. 20 Regulation EU 679/2016 – GDPR) receiving data in a structured format, commonly used and readable from an automatic device, for the purposes of exercising the right to portability;
- (Art. 21 Regulation EU 679/2016 – GDPR) opposing processing.

The data subject can exercise their rights as well as ask for more information about their Personal Data, by sending an email to info@steminspa.it and specifying the content of their request in the subject line.

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Requests concerning the Data subject's choice to avail of their rights will be issued without undue delay and, in any case, within one month of the request; only in particularly complex cases and large number of requests, may this be extended by a further 2 (two) months.

Please remember that it is your right (as per art. 77 Regulation EU 679/2016 – GDPR) to submit a complaint to the Data Protection Authority, whose contact information is available [here](#)

Latest update: 12nd June 2025

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