



Sede Legale e Amministrativa:
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Capitale Sociale € 7.800.000,00 socio unico
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REA n. MI-1476140
Codice Fiscale n. 11574560154
Partita IVA n. 02992760963

PRIVACY POLICY PURSUANT OF ART. 13 OF THE REGULATION EU 2016/679

This privacy policy is an addition to the one already communicated, and it concerns only the processing of personal data regarding the filming of videos and photo shooting. Regarding all the data subjects which are the focus of this privacy policy, for everything that is not addressed explicitly in this document you must refer to the other already communicated privacy policy delivered by the Data Controller.

1. Data Controller

IKEA Italia Retail S.r.l.
Strada Provinciale 208, n. 3
20061 Carugate (MI)
privacy.it@ingka.ikea.com

2. Categories of processed personal data

The Data Controller processes only personal data as defined by art. 4.1 of the GDPR.

More in detail, categories of personal data which will be processed are listed below. This list is exemplary and non-restricting:

- Identification Data (name, surname, etc.) and potential contact details
- Photographic or audiovisual content concerning the data subject.

3. Purposes and lawful basis for personal data processing

The processing of personal data is performed in compliance with all the provisions established by the GDPR and any other laws applicable. More details will follow.

3.1 Purposes based upon a legal obligation (Art. 6 paragraph 1 (c) of the GDPR)

- Audio-video, photographs of the event that include the data subject, in order to fulfill a legal obligation, and/or to follow an order of the authorities.

The retention period of personal data, with respect to the purposes set forth in this section is:

For purpose a: for the duration of the event, and/or for the time strictly necessary for the fulfillment of the aforementioned purposes.

3.2 Purposes based upon legitimate interest (Art. 6, paragraph 1 (f) GDPR)

Where necessary, the processing of audio-video, photographs of the event that include the data subject, is aimed at safeguarding our legitimate interest or that of third parties. This will be limited to the processing of necessary data only on the condition that the rights of the data subject interested do not prevail. The processing will include the following purposes, in particular:

- protection of the company's assets, i.e. the legitimate need of the owner to preserve the company's assets (by way of example but not limited to acts of vandalism, theft, unauthorized access to the headquarters with consequent damage to objects making up the assets itself), all in respect for interested parties and their rights.
- protection and safety of staff and visitors.
- re-processing of video footage and/or photographs in order to make the subjects filmed and/or photographed unrecognizable, before publishing such video footage and/or photographs on web, social and media channels.

The retention period of personal data, in relation to the purposes referred to in this section, is:

For the purposes: a, b, for the duration of the event and/or for the time strictly necessary for the fulfillment of the aforementioned purposes (e.g. carrying out checks and/or investigations).

For the purpose c. for the duration of the event and related re-processing of video footage and/or photographs for the purposes of the above.

4. Data recipients or categories of data recipients (pursuant of Art. 13 par. 1 letter (e) GDPR) *

The Data Controller may communicate your data to:

- Offices and internal functions of the Controller itself.
- Service providers.
- Any public administrations and public authorities, if requested by them as part of their institutional activities.
- Photographers, graphic designers and printers with respect to the production and use of photographic services.

5. Data Subject's Rights (pursuant of Art. 13 par. 2 letter (b) GDPR)

The Data Subject can exercise the following rights, whenever it will be materially possible to do so, in relation to the functionalities of the system and by keeping in mind the fact that the Data Controller does not retain the User's personal data for a period longer than 90 days from the moment when the data has been collected:

- Right of access by the data subject [art. 15 of EU Regulation] (possibility to be

informed on the treatments carried out on his personal data and, if necessary, receive a copy of them);

- Right to rectification [art. 16 of EU Regulation] (data subject has the right to rectify incorrect data concerning him);
- Right to erasure without unjustified delay ("right to be forgotten") [art. 17 of EU Regulation] (data subject has the right to delete his personal data);
- Right to restriction of processing, as provided by article 18 of EU Regulation, among the other cases, in case of il-licit processing or contestation of the accuracy of personal data by the data subject [art. 18 of EU Regulation];
- Right to data portability [art.20 of EU Regulation], (data subject has the right to receive the personal data concerning him/her, which he/she or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as provided by the same article);
- Right to object to processing [art. 21 of EU Regulation] (the data subject has the right to object processing of personal data as provided by article 21 of EU Regulation);
- Right to not be subject to automated individual decision-making [art. 22 of EU Regulation] (The data subject shall have the right not to be subject to a decision based solely on automated processing).

More information regarding the data subject's rights is available on the website www.ikea.com or can be obtained upon requesting the integral excerpt of the above listed articles to the Data Controller.

In compliance with art. 19 of the EU Regulation, the Data Controller will inform the recipients to whom the data has been communicated to, of the eventual corrections, cancellation, or limitations to requested whenever it will be possible to do so.

To give You a faster response to the requests made by exercising Your rights, they can be sent to the Data Controller's by e-mail to the following address privacy.it@ingka.ikea.com.

6. Right to lodge a complaint (Art. 13 paragraph 2 (d) of the GDPR)

If the Data Subject thinks that her/his rights have been violated, she/he has the rights to lodge a complaint to the National Data Protection Authority, with the modalities listed on its web which can be reached by the following link: <http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524> or by sending a written communication to the National Data Protection Authority.

7. Possible consequences of a failure to communicate personal data (art. 13 paragraph 2 (e) of the GDPR)

7.1 In case of processing based upon the Data Controller's legitimate interest

Regarding purposes based upon the Controller's legitimate interest which do not require the data subject's consent, the opposition of the latter to the processing will result in the impossibility to go forward with the relating purposes and the eventual connected services for which the data subject has expressed her/his opposition to, safe for legitimate and prevailing interests or for those relating to the safeguarding of rights in case of litigation (in those cases there will not be a right to opposition).

On this note and for these reasons, regarding the shooting of videos, it must be known that the data subject will not be able to oppose to the relating data processing and she/he will be subjected to the shooting of the video if and when she/he participates to the event.

For those who prefer to not be subjected to the shooting of the Photos/Videos, IKEA kindly asks to not stand in the dedicated and clearly visible areas due to the specific signs.

8. Methods of personal data processing

Personal data will be processed exclusively in an electronic format through the use of the mobile Application made available, which will be accessible only by the Data Controller's explicitly authorized people and entities which can be qualified as Data processors or Authorized Personnel. They will be able to perform operations on personal data regarding their consultation, usage, processing, comparing and other operations, even those automated in accordance with the applicable legislation, also to guarantee the confidentiality and security of personal data, and also its accuracy, updating and relevancy in relation to the stated purpose.