

# LIA - Legitimate Interest Assessment

---

## Summary

|                                                                                                                                                        |           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>INTRODUCTION.....</b>                                                                                                                               | <b>2</b>  |
| <b>DEFINITIONS .....</b>                                                                                                                               | <b>3</b>  |
| <b>1. BACKGROUND.....</b>                                                                                                                              | <b>4</b>  |
| <b>2. THE LEGITIMACY OF THE INTEREST OF S.I.TEX., THE RELEVANCE OF THAT<br/>INTEREST TO THE DATA CONTROLLER, AND THE NEED FOR DATA PROCESSING.....</b> | <b>5</b>  |
| <b>3. THE IMPACTS, BOTH REAL AND POTENTIAL, OF DATA PROCESSING ON THE RIGHTS<br/>AND INTERESTS OF THE DATA SUBJECTS.....</b>                           | <b>6</b>  |
| <b>4. INTERIM BUDGET. ....</b>                                                                                                                         | <b>7</b>  |
| <b>5. SAFEGUARDS TO PROTECT THE DATA SUBJECT. ....</b>                                                                                                 | <b>8</b>  |
| <b>6. TESTING. ....</b>                                                                                                                                | <b>9</b>  |
| <b>7. DECISION .....</b>                                                                                                                               | <b>15</b> |

## INTRODUCTION

The LIA (*Legitimate Interest Assessment* - *Legitimate Interest Assessment*) allows to verify whether the interest of the Data Controller is legitimate, thus allowing to use the legal basis of legitimate interest, as contemplated by Art. 6 par. 1 lett. f) GDPR for one or more specific purposes of Processing.

Making a LIA allows the Data Controller to demonstrate that it has made due assessments regarding the interests pursued through the Data Processing and has determined that these interests outweigh the rights and freedoms of Data Subjects.

Through the drafting of a LIA, the Data Controller promotes a clear and transparent approach to Data Processing, carefully considering the impact that such Processing might have on individuals and ensuring that the interest identified is justified and legitimate.

In addition, the LIA provides a structured framework for documenting the decision-making process and demonstrating the compliance of the Data Controller's choices with data protection regulations.

## DEFINITIONS

- **Personal Data:** any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable person is one who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more characteristic elements of his or her physical, physiological, genetic, mental, economic, cultural or social identity.
- **Processing means** any operation or set of operations, whether or not performed by automated means and applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction.
- **Data Subject:** the natural person to whom the processed personal data refer (e.g. a Buyer or Exhibitor participating in events organized by SI.TEX., but also a supplier of SI.TEX. such as, for example, an external consultant).
- **Data Controller:** the natural or legal person, public authority, service or other body which, individually or jointly with others, determines the purposes and means of the Processing of personal data;
- **Data Controller:** the natural or legal person, public authority, service or other body that processes personal data on behalf of the Data Controller.

## 1. BACKGROUND.

The processing covered by this LIA concerns the possibility of using the legal basis of legitimate interest for the processing of personal data (including profiling data) through the Milano Unica App mobile application developed and managed by **SI.TEX. S.p.A.** for **Milano Unica**, intended for buyers, exhibitors, and other professional operators participating in the trade show organized by the Data Controller.

Data Processing carried out through the App (already subject to DPIA under Article 35 of the GDPR) and also subject to LIA is necessary in order for Data Subjects to perform the following actions:

- register and manage their personal and company profiles;
- select product preferences;
- consult exhibitors and content based on their interests;
- plan appointments and activities during the fair;
- take notes about information or contacts acquired during the event;
- access digital services related to their experience at the trade show.

Personal data include:

- identification data (first name, last name, email address, company, title);
- contextual and interaction data (preferences, appointment history, exhibitors consulted, saved notes);
- data generated while using the application, which may reflect professional interests or behavior.)

Data Processing also includes profiling data under Article 4 of the GDPR as the preferences and interactions recorded in the app are used to suggest personalized content (e.g., exhibitors consistent with the interests indicated by the user) and facilitate matchmaking. However, it should be noted that profiling does not result in any automated decision with legal or significant effects on the data subject pursuant to Article 22 of the GDPR.

Data Processing is carried out mainly by digital means, through cloud infrastructures managed by Data Processors, and involves the storage of data for a period strictly necessary for the management of the event and the activities immediately following it. For more details on Data Processing as a whole and for information on the technical aspects, consult **“20250611 DPIA APP MILANO UNICA”**.

The purpose of the assessment is to verify whether Data Processing is based, pursuant to Article 6(1)(f) of the GDPR, on the legitimate interest of the Data Controller, in compliance with the fundamental rights and freedoms of the Data Subjects.

## 2. THE LEGITIMACY OF THE INTEREST OF S.I.TEX., THE RELEVANCE OF THAT INTEREST TO THE DATA CONTROLLER AND THIRD PARTIES, AND THE NEED FOR DATA PROCESSING.

SITEX. S.p.A. on behalf of Milano Unica, as Data Controller, pursues a legitimate, concrete, and current interest based on organizational and relational needs strictly connected to the organization of Milano Unica, a reference trade show for the textile and apparel industry.

The interest underlying Data Processing is reflected in the need to:

- improve the visit and organization of the trade show experience by facilitating contacts between buyers and exhibitors through the use of the App as an operational support tool;
- optimize the visit routes and activities at the trade show by facilitating the scheduling of appointments and access to information;
- ensure a high level of efficiency and personalization, consistent with the expectations of professionals operating in a specialized B2B context.

This interest meets the requirements set out by point 17 of the European Data Protection Board (EDPB) Guidelines 1/2024, and Article 6, paragraph 1, letter f) of the GDPR, namely (for the reasons set out and explained below):

- it is lawful, as it does not conflict with mandatory rules;
- explicit and defined, as evidenced by the information and contractual documents;
- concrete and current, and not merely hypothetical;
- compatible with the reasonable expectations of the Data Subjects, as also provided for in recital 50 of the GDPR.

As stated by the Court of Justice (ruling C-13/16 – *Rīgas satiksme*), the legitimate interest must be genuine at the time of processing and referable to a real and demonstrable purpose.

In this case, Milano Unica's objective of providing users with a digital tool to support their trade show experience is unequivocally concrete.

Furthermore, the necessity of the processing is demonstrated by the fact that:

- the App features are not technically usable without processing the data subject's data and preferences;
- content personalization and contact planning are fundamental for a successful trade show experience;
- there are no less invasive or alternative tools available that can ensure the same practical and effective result.

In this case, in addition to the above considerations, all the elements and criteria set forth in point 17 of the EDPB's new "Guidelines 1/2024 on the Processing of Personal Data under Article 6(1)(f) of the GDPR" cumulatively apply in order for the interest to be considered "legitimate".<sup>1</sup>

In summary:

In light of the above, Data Processing can be considered justified by a legitimate interest under Article 6(1)(f) of the GDPR, as it is:

- current and substantial;
- clearly identified and documented;
- not contrary to the fundamental rights of the Data Subjects.

The satisfaction of all the requirements referred to in the above-mentioned Guidelines allows SI.TEX to proceed with the assessment of the subsequent steps of the analysis, namely, the need for Data Processing and balancing (see below).

### 3. THE IMPACTS, BOTH REAL AND POTENTIAL, OF DATA PROCESSING ON THE RIGHTS AND INTERESTS OF THE DATA SUBJECTS.

Data Processing has a limited potential impact on the fundamental rights and freedoms of the Data Subjects, given the non-sensitive nature of the data processed, the limited and non-invasive purpose of the processing, and the context in which processing takes place.

The personal data processed through the Milano Unica App refer exclusively to professional areas (first name, last name, role, company, product sector, visit preferences)<sup>2</sup> and do not include special categories of data under Article 9 of the GDPR. The use of such data is limited to the duration and management of the trade show.

The data processed (including data obtained from profiling, see below) are not subject to any automated decision-making pursuant to Article 22 of the GDPR, nor do they give rise to any classification, scoring, or evaluation of the Data Subjects that would have a significant impact on them.

Finally, it should be noted that any profiling activities carried out are **functional** to the personalization of the trade show service and do not affect in any way the legal or subjective position of the users.

---

<sup>1</sup> For a similar set of criteria, see WP29, Opinion 06/2014 on the concept of legitimate interest of the data controller under Article 7 of Directive 95/46/EC (WP 217, adopted April 9, 2014), pages 24-25.

<sup>2</sup> For specific details regarding the personal data subject to processing, consult the aforementioned Annex 1

The criterion of the reasonable expectation of the data subject is particularly relevant in assessing the impact in correlation with the use of the legitimate interest as the legal basis for profiling, as recalled by:

- recital 47 of the GDPR, according to which the legitimate interest of the Data Controller may be justified “where there is a relevant and appropriate relationship between the data subject and the controller”;
- recital 50, which emphasizes the importance of transparency and predictability of processing;
- point 19 of the EDPB Guidelines 1/2024, which recommends considering the nature of the relationship between the parties, the transparency of information, and the reference sector.

In the specific case:

- the use of the App is optional and strictly functional to participation in an event to which users voluntarily register;
- the processing takes place in a highly structured B2B context, where it is foreseeable for a professional that their data be used to better organize the trade show experience;
- the data subject can directly intervene on their information, modify it, or remove it, maintaining a high level of control.

In summary, the impact can be assessed as limited and proportionate (the foregoing also taking into account the technical measures adopted and the balance between the requirements of the Data Controller and the position of the data subject. In this regard, see paragraphs 4 and 5 below.

## 4. INTERIM BALANCE.

Before considering the technical and organizational measures adopted, Data Processing has a limited but not irrelevant impact on the rights and freedoms of the Data Subjects.

The interest of the Data Controller is concrete, current, and legally legitimate, as it aims to improve the organization of the trade show experience and facilitate the supply and demand matching in a B2B context in line with the purposes of the event.

The potential impact on the Data Subjects, while not high, cannot be considered entirely negligible, as:

- there is a (limited) profiling component, even if it is not automated or discriminatory;
- identification and behavioral data are processed, albeit linked to professional preferences;
- the processing is carried out using digital tools outside the direct control of the data subject (e.g., cloud infrastructure, third-party providers).

However, the professional context and nature of the service provided and the specific Data Processing activities carried out on the personal data of the Data Subjects mean that the impact and interference with fundamental rights is practically nil and, in any case, foreseeable and acceptable to the Data Subjects, who register voluntarily and interact knowingly with the tool in line with the provisions of recital 47 of the GDPR regarding reasonable expectations.

In summary:

- the interest of SI. TEX. S.r.l./Milano Unica is legitimate and justifiable;
- the impact on the Data Subjects is moderate and does not outweigh the interest of the Data Controller;
- the balance, in the absence of further measures, tends to favor the Data Controller, but despite the practically negligible impact on the rights and freedoms of the Data Subjects, as well as their reasonable expectations regarding the Data Processing in question, needs appropriate strengthening safeguards. These are assessed in the section below.

## 5. SAFEGUARDS TO PROTECT THE DATA SUBJECT.

Based on the foregoing, SI.TEX. S.p.A./Milano Unica has adopted a series of technical and organizational measures in line with the principles of accountability and personal data protection by design, aimed at reducing the risk to the rights and freedoms of Data Subjects in correlation with the processing carried out through the Milano Unica App.

The safeguards include:

### 5.1. Limitation and proportionality of Data Processing

Data Processing is limited to first name, last name, email address, company name, title, product preferences expressed in the App, contact history, and any notes entered. For more specific details on Data Processing, consult the aforementioned document Annex 1 **“20250611 DPIA APP MILANO UNICA.”**

No special data is processed under Art. 9 of the GDPR.

Data collection is strictly functional to pursue the Data Processing objectives in line with the organization of the trade show, and does in no case ever exceed such purposes.

### 5.2. Control and level of awareness by Data Subjects

The use of the App is entirely optional and in no event linked to the possibility of accessing the event, which is also open to users who do not use the App.

The information provided transparently describes the purposes of Data Processing and specifies any profiling activities, which are in any case not automated.

Users can access, modify, and delete their data directly from their reserved area.

### **5.3. Documented technical measures**

The technical documentation shows the effective implementation of the following measures:

- encryption of data in transit: communication between the App and the server takes place via HTTPS;
- user authentication with access credentials to personal profiles;
- partitioning of the App into microservices (Tinext back-end, CRM Salesforce) to reduce exposure;
- backup on Salesforce and Tinext systems. For details on the technical IT security measures, refer to the aforementioned DPIA.

### **4. Data processors and contractual documentation**

The appointments of Data Processors for the suppliers involved in this analysis are currently in progress.

### **5. Data transferred to third countries**

Some data, limited to the CRM area, may be processed via Salesforce, which is registered and certified under the EU-US Data Privacy Framework, as confirmed in the DPIA documentation and findings.

Such transfers are based on Article 45 of the GDPR (adequacy decision of July 10, 2023) and do not require additional legal instruments such as standard contractual clauses (SCCs).

### **6. Prior risk assessment**

A DPIA pursuant to Article 35 of the GDPR has been prepared and approved. The analysis was structurally based on three main risk scenarios: unauthorized access, undue modification, and loss of personal data subject to processing.

The residual risk was assessed as limited or negligible, depending on the measures taken and the absence of sensitive or invasive processing.

These safeguards, taken as a whole, allow SI.TEX to consider the processing to be adequately protected from a technical and organizational standpoint in accordance with the EDPB Guidelines 1/2024 recommendations and in line with the principles of proportionality, minimization, and accountability of the Data Controller.

## **6. TESTING.**

The Testing below analytically refers to the requirements set out in the "Article 29 Data Protection Working Party on Legitimate Interest - 2014" and the already mentioned EDPB's "Guidelines 1/2024 on the Processing of Personal Data under Article 6(1)(f) of the GDPR", version 1.0 of October 8, 2024, applying the methodology of ICO (the Information

Commissioner's Office, the independent UK authority that corresponds to the Italian Data Protection Authority [Garante per la Protezione dei Dati personali]), which has developed a 3-level testing system. The system is recognized at the EU level as a benchmark (also post-Brexit) and is used here to validate the points already made in the body of this paper.

## PART 1: PURPOSE

The Data Controller must assess whether there is a legitimate interest underlying Data Processing.

|                                                                                                                                                                                                                                                                                                 |                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| <b>6.1.1</b>                                                                                                                                                                                                                                                                                    | <b>Why does the Data Controller intend to carry out Data Processing?</b>                                   |
| The Data Controller Owner intends to carry out Data Processing to improve the services offered to its users.                                                                                                                                                                                    |                                                                                                            |
| <b>6.1.2</b>                                                                                                                                                                                                                                                                                    | <b>What benefits does the Data Controller expect from Data Processing?</b>                                 |
| The Data Controller expects that all parties involved in Data Processing benefit from it. As regards the benefits for the Data Controller, the latter expects to improve the services offered to its stakeholders in order to further strengthen its position in the reference market.          |                                                                                                            |
| <b>6.1.3</b>                                                                                                                                                                                                                                                                                    | <b>Are there any Third Parties that benefit from Data Processing?</b>                                      |
| N/A.                                                                                                                                                                                                                                                                                            |                                                                                                            |
| <b>6.1.4</b>                                                                                                                                                                                                                                                                                    | <b>Are there broader public benefits present in Data Processing?</b>                                       |
| N/A                                                                                                                                                                                                                                                                                             |                                                                                                            |
| <b>6.1.5</b>                                                                                                                                                                                                                                                                                    | <b>How important are the benefits identified by the Data Controller?</b>                                   |
| The benefits identified by the Data Controller are important from the overall perspective and aim to maximize the economic outcome of the event organized by the Data Controller. Given such economic relevance, the benefits can be legitimately pursued under Article 41 of the Constitution. |                                                                                                            |
| <b>6.1.6</b>                                                                                                                                                                                                                                                                                    | <b>Is the Data Controller complying with specific data protection rules applicable to Data Processing?</b> |

|                                                                                                                |                                                                                       |
|----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| The Data Controller has implemented the measures set forth in section 5 herein and in the aforementioned DPIA. |                                                                                       |
| <b>6.1.7</b>                                                                                                   | <b>Is the Data Controller complying with other relevant laws?</b>                     |
| N/A                                                                                                            |                                                                                       |
| <b>6.1.8</b>                                                                                                   | <b>Is the Data Controller complying with industry guidelines or codes of conduct?</b> |
| N/A                                                                                                            |                                                                                       |
| <b>6.1.9</b>                                                                                                   | <b>Are there ethical issues regarding Data Processing?</b>                            |
| N/A                                                                                                            |                                                                                       |

## PART 2: NECESSITY

The Data Controller must assess whether the Processing is necessary for the purpose identified.

|                                                                                                                                                                                                                                                    |                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| <b>6.2.1</b>                                                                                                                                                                                                                                       | <b>Will Data Processing help the Data Controller achieve its purpose?</b>        |
| Data Processing is necessary to maximize the present and future economic and commercial results of the service offered. This holds true for the Data Controller, and the Data Subjects, the Buyers and Exhibitors participating in the trade show. |                                                                                  |
| <b>6.2.2</b>                                                                                                                                                                                                                                       | <b>Is Data Processing proportionate to the purpose?</b>                          |
| Yes, Data Processing is proportionate to the purposes and the data subject can reasonably expect this type of action from the Data Controller.                                                                                                     |                                                                                  |
| <b>6.2.3</b>                                                                                                                                                                                                                                       | <b>Can the Data Controller achieve the same purpose without Data Processing?</b> |
| No, the reasons are specified in points 1-5 above.                                                                                                                                                                                                 |                                                                                  |

|                                                                                                                                                                                                                            |                                                                                                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| <b>6.2.4</b>                                                                                                                                                                                                               | <b>Can the Data Controller achieve the same purpose by processing less data, or by processing data in a more overt or less intrusive way?</b> |
| No, Data Processing complies with both the principle of necessity and that of minimization. Data processed are the least necessary and of the least “invasive” quality to achieve the purposes set by the Data Controller. |                                                                                                                                               |

### PART 3: BALANCING

The Data Controller must consider the impact on the interests, rights and freedoms of individuals and assess whether this overrides its legitimate interests.

| NATURE OF PERSONAL DATA                                                                                                                                                                                                                                        |                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <b>6.3.1</b>                                                                                                                                                                                                                                                   | <b>Is the personal data subject to Data Processing special category data or data on criminal offenses?</b>                      |
| No, the personal data subject to processing does not fall within the special categories pursuant to Article 9 of the GDPR and does not relate to criminal offences or convictions (see point 1 herein for details of the personal data subject to processing). |                                                                                                                                 |
| <b>6.3.2</b>                                                                                                                                                                                                                                                   | <b>Is the personal data subject to Data Processing personal data that people are likely to consider particularly "private"?</b> |
| No, see above.                                                                                                                                                                                                                                                 |                                                                                                                                 |
| <b>6.3.3</b>                                                                                                                                                                                                                                                   | <b>Is the Data Controller processing personal data regarding children or other vulnerable groups of individuals?</b>            |
| N/A (in any case, no, see point 1 herein for details regarding personal data subject to processing).                                                                                                                                                           |                                                                                                                                 |
| <b>6.3.4</b>                                                                                                                                                                                                                                                   | <b>Does the personal data subject to Data Processing concern individuals in their personal or professional capacity?</b>        |
| No. Although the personal data subject to Data Processing refers to the professional sphere, data do not concern nor reveal any information with respect to the professional capacity of the Data Subject.                                                     |                                                                                                                                 |

| REASONABLE EXPECTATIONS                                                                                                                                                                                                                                                                                |                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>6.3.5</b>                                                                                                                                                                                                                                                                                           | <b>Is there an existing relation between the Data Controller and the Data Subject?</b>                                                                                |
| Yes, the Data Subject is the person who participates in the events organized by the Data Controller.                                                                                                                                                                                                   |                                                                                                                                                                       |
| <b>6.3.6</b>                                                                                                                                                                                                                                                                                           | <b>What is the nature of the relation and how has personal data been used in the past?</b>                                                                            |
| The nature of the relation can be framed in the User/Data Subject - Service Provider/Data Controller paradigm.                                                                                                                                                                                         |                                                                                                                                                                       |
| <b>6.3.7</b>                                                                                                                                                                                                                                                                                           | <b>Was personal data collected directly from the Data Subject?</b>                                                                                                    |
| The data are obtained directly from the Data Subjects or their companies.                                                                                                                                                                                                                              |                                                                                                                                                                       |
| <b>6.3.8</b>                                                                                                                                                                                                                                                                                           | <b>If personal data were obtained from a third party, what did the Data Subjects say about third-party reuse for other purposes?</b>                                  |
| N/A. See above.                                                                                                                                                                                                                                                                                        |                                                                                                                                                                       |
| <b>6.3.9</b>                                                                                                                                                                                                                                                                                           | <b>How long ago was personal data collected? Have there been any changes in technology or context since then that might affect the expectations of Data Subjects?</b> |
| Personal data subject to Data Processing are collected during user registration and, specifically, the Milano Unica online form to be filled out before the event. Due to the nature and type of Data Processing, there have been no changes that may have affected the expectations of Data Subjects. |                                                                                                                                                                       |
| <b>6.3.10</b>                                                                                                                                                                                                                                                                                          | <b>Is the Data Controller's intended purpose and criteria of Data Processing understood by the Data Subject?</b>                                                      |
| Yes, the Policy that is delivered to the Data Subject to make him/her aware of the methods and purposes of Data Processing is simple, clear and comprehensive. The Policy is accessible both through the App and the Milano Unica website.                                                             |                                                                                                                                                                       |
| <b>6.3.11</b>                                                                                                                                                                                                                                                                                          | <b>Is the Data Controller planning to do something new or innovative?</b>                                                                                             |

|                                                                                                                                                                                                                                                                                                                                                       |                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| No.                                                                                                                                                                                                                                                                                                                                                   |                                                                                                      |
| <b>PROBABLE IMPACT</b>                                                                                                                                                                                                                                                                                                                                |                                                                                                      |
| <b>6.3.12</b>                                                                                                                                                                                                                                                                                                                                         | <b>What are the possible impacts of Data Processing on individuals?</b>                              |
| There is no negative impact.                                                                                                                                                                                                                                                                                                                          |                                                                                                      |
| <b>6.3.13</b>                                                                                                                                                                                                                                                                                                                                         | <b>Will Data Subjects lose control over the use of their personal data?</b>                          |
| <p>No, Data Subjects will always be able to control their personal data.</p> <p>Data Subjects are adequately informed through the Policy on the rights they can exercise, as required by Articles 13 and 14 of the GDPR.</p> <p>In addition, the Data Controller has implemented an internal procedure for the exercise of Data Subjects' rights.</p> |                                                                                                      |
| <b>6.3.14</b>                                                                                                                                                                                                                                                                                                                                         | <b>What is the likelihood of occurrence and severity of any potential impacts?</b>                   |
| The likelihood of occurrence of potentially harmful impacts is considered to be irrelevant as a result of the reasons provided herein.                                                                                                                                                                                                                |                                                                                                      |
| <b>6.3.15</b>                                                                                                                                                                                                                                                                                                                                         | <b>Can Data Subjects be against Data Processing or consider it invasive?</b>                         |
| No, because the same thing happens when you use the Milano Unica App, which is optional. You can participate in events without using the system, whose sole purpose is to improve the user's experience at the trade show.                                                                                                                            |                                                                                                      |
| <b>6.3.16</b>                                                                                                                                                                                                                                                                                                                                         | <b>Can the Controller adopt measures to minimize the impact of Data Processing on Data Subjects?</b> |
| See Point 5.                                                                                                                                                                                                                                                                                                                                          |                                                                                                      |
| <b>Can the Data Controller offer Data Subjects an opt-out option?</b>                                                                                                                                                                                                                                                                                 | <b>Yes</b>                                                                                           |

## 7. DECISION

|                                                                                 |                                                                    |            |
|---------------------------------------------------------------------------------|--------------------------------------------------------------------|------------|
| <b>Can the Data Controller base its Data Processing on legitimate interest?</b> |                                                                    | <b>Yes</b> |
| <b>Notes:</b><br>-                                                              |                                                                    |            |
| <b>Drafted by</b>                                                               | Avv. Lorenzo Colzi                                                 |            |
| <b>Reviewed by</b>                                                              | Dr. Francesca Nuti                                                 |            |
| <b>Approved by</b>                                                              | For the Data Controller<br><br>S.I.Tex Spa<br><br>Massimo Mosiello |            |
| <b>Date</b>                                                                     | 16/6/2025                                                          |            |