

Privacy Notice on the processing of personal data pursuant to Regulation (EU) 2016/679

CONAI – Consorzio Nazionale Imballaggi (National Packaging Consortium) is a private, non-profit organisation that carries out the institutional activities specifically provided for by Legislative Decree 152/2006 (Environmental Code), aimed at protecting the environment, promoting sustainability and ensuring the sustainable management of packaging waste.

These purposes are achieved, among other things, through information and support initiatives for businesses, including with the involvement of local and/or trade associations to which those businesses belong.

Pursuant to and for the purposes of Regulation (EU) 2016/679 (hereinafter the “Regulation”), CONAI hereby provides information on the processing of personal data in the context of the above activities.

1. Data Controller

The Data Controller is CONAI – Consorzio Nazionale Imballaggi (National Packaging Consortium), with registered office in Rome, Via Tomacelli 132, and operational office in Milan, Via Pompeo Litta 5 – Tel. +39 02 540441, certified email (PEC): conai@conai.legalmail.it (hereinafter “CONAI”).

2. Data Protection Officer

The Data Protection Officer appointed by CONAI can be contacted by sending an email to dpo@conai.org.

3. Personal data

“Personal data” means any information that concerns an identified or identifiable natural person.

In particular, processing may concern contact details of association representatives, such as forename and surname, email address, role, and the name of the association to which they belong (hereinafter the “Data”).

Processing concerns data originating from public or publicly accessible sources or from public bodies, as well as data provided directly by the data subject, in the context of CONAI’s institutional activities.

4. Purposes and legal bases of processing

The Data is processed to promote compliance with legislation on the management of packaging waste and to support CONAI’s activities, through the sending of:

- institutional communications providing information about the obligations to join the CONAI EPR Organisation and pay the EPR Fee, and communications concerning the promotion of initiatives, services and tools supporting businesses and associations (for example, communications about eco-design initiatives, services and tools);

- invitations to events, initiatives and webinars organised by CONAI.

Processing has its legal basis in the fulfilment of a legal obligation and in the performance of a task carried out in the public interest (Article 6.1, points (c) and (e) of the Regulation), as well as in CONAI's legitimate interest (Article 6.1, point (f) of the Regulation).

5. Methods of processing

For the purposes referred to above, the Data is processed by electronic means, in compliance with the regulations on the processing of personal data, and adopting appropriate security measures.

The Data will be processed exclusively by CONAI internal staff who perform activities connected with and instrumental to the above purposes, specifically authorised, trained and instructed to ensure adequate security and confidentiality, and to avoid the risks of loss and/or destruction or access by unauthorised parties.

6. Communication of Data

The Data may also be communicated to entities specifically appointed as Data Processors (individuals or organisations processing data according to CONAI's documented instructions, such as, by way of example, parties responsible for organising and managing CONAI events, or for managing and maintaining IT systems).

The updated list of Data Processors is available at CONAI's operational office.

7. Data retention period

The Data is retained for the time necessary to achieve the purposes described above, without prejudice to legal data retention obligations and any additional retention needs related to establishing, exercising or defending a right, as well as exercising the rights referred to in section 8 below.

8. Rights of the data subject

In relation to the Data, the data subject has the right to request from CONAI, in the manner indicated in the Regulation and without prejudice to the limitations set out in the Regulation itself and in Legislative Decree 196/2003 (Part I, Title I, Chapter III):

– access, in the cases provided (Article 15 of the Regulation) – the data subject has the right to obtain confirmation from the Data Controller of whether or not personal data concerning them is being processed and, where that is the case, access to the personal data and the information referred to in Article 15 of the Regulation, in particular: processing purposes; categories of personal data; categories of recipients to whom the Data has been or will be communicated; Data retention period or criteria used to determine that period; source of the Data; existence of automated processes, including profiling;

- rectification of inaccurate Data and completion of incomplete Data, without undue delay (Article 16 of the Regulation);
- erasure of the Data for the reasons provided without undue delay (Article 17 of the Regulation), for example where the Data is no longer necessary for the purposes indicated above or is not processed in compliance with the Regulation;
- restriction of processing in the cases provided (Article 18 of the Regulation), for example where the accuracy of the Data is contested and needs to be verified;
- portability, meaning the right to receive, in the cases provided (Article 20 of the Regulation), the Data in a structured, commonly used and machine-readable format, and to transmit such Data to another data controller;
- objection to processing, in the cases provided (Article 21 of the Regulation).

All the rights listed above may be exercised by sending a communication to CONAI by email to privacy@conai.org or by registered letter to the operational office in Milan, Via Litta 5.

9. Complaints

If the data subject believes that the processing of the Data infringes the Regulation, they have the right to lodge a complaint with the Italian Data Protection Authority, as provided by Article 77 of the Regulation.

10. Transfer abroad

The Data is stored at CONAI's premises and on servers located within the European Union.

CONAI