Mediaddress
Media contact

MEDIADDRESS S.r.l. — Privacy Notice for Journalists

This Privacy Notice describes the privacy policies adopted by Mediaddress (hereinafter also "we", "us" or "our") for the collection and processing of Journalists' personal data and is provided pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (the "GDPR"). By "Journalists" we mean professionals working in the information sector, journalists, publishers, editorial offices, bloggers, social media commentators, opinion writers and anyone active in the media sector.

MEDIADDRESS is a database of Italian and foreign media outlets and journalists recognised by the Italian Order of Journalists (*Ordine dei Giornalisti*). The database was established approximately 30 years ago and, over the years, has had more than 3,000 subscribing press offices and more than 6,000 registered journalists. MEDIADDRESS offers the highest security standards and, through the technical and organisational measures implemented, ensures the fullest compliance with the principles of transparency, fairness, proportionality and accountability set out in the GDPR, in Legislative Decree 196/03 as amended by Legislative Decree 101/18, and in the decisions and guidelines issued by the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) and by the competent European bodies (the "Privacy Legislation"). Our processes are subject to continuous audits for the purposes of UNI EN ISO 9001:2008 and ISO 27001:2017 certification.

MEDIADDRESS was created to make the flow of information between press offices and journalists more targeted.

1. Data Controller

The data controller is Mediaddress S.r.l., with registered office in Milan, Via G. Compagnoni, 30 – 20129 (the "Data Controller"), as it determines the purposes and means of the processing of personal data in connection with the services offered through the MEDIADDRESS (www.mediaddress.com) and Windpress (www.windpress.info) databases.

2. Personal Data

The personal data of Journalists that are processed are ordinary personal data (first and last name, name of the editorial office, the Journalist's role within the editorial office, the Journalist's areas of expertise/interest, most recent journalistic work, the Journalist's editorial office email address and editorial office telephone number, social media addresses) (the

"Journalists' Data"). Data that are not relevant and strictly necessary for pursuing the purposes indicated below are not collected. For example, we do not collect personal data unrelated to the professional sphere (such as mobile phone number, private email address or other personal contact details) unless these are voluntarily provided to us by the Journalist by registering for the services offered by the Data Controller through its platforms (the "Platforms"). We do not collect data falling within the special categories of personal data referred to in Article 9(1) of the GDPR. In connection with the tracking referred to in Section 5, data concerning interaction with messages are also processed (opening, number, date and time, clicks).

3. Purposes of Processing

We collect and process Journalists' Data within the limits of the Privacy Legislation in order to provide goods and services to third parties or to Journalists who have registered for the services offered by the Data Controller through the Platforms (the "Registered Journalists"). Journalists' Data are processed exclusively for purposes connected with journalistic activity and the press in general. We use only the data strictly necessary to provide our services, and only for purposes that are compatible with those for which the Journalists' Data were collected, received or their use was authorised.

Our Users (as defined in Section 5 (Recipients)) use the Journalists' Data included in our products and services to identify the most appropriate Journalists with whom to establish a dialogue and to manage their company's reputation by distributing their press releases, announcements and product launches, or content relevant to the community and the market in the case of communications from institutions and Public Administrations.

In particular, Journalists' Data are collected and processed for the following purposes:

- creation, storage and updating of the Journalist profile;
- provision of our services, including: consultation by Users, creation and export of reports showing lists of results matching the search criteria entered by the User, and sending of press releases by Users;
- responding to Journalists' requests concerning the products and services dedicated to them (including the selection of press releases in their areas of interest);

- measurement of the performance of communications sent through the Platforms (Section 5).

Updates are carried out according to an automated schedule by means of (i) periodic requests to editorial offices to confirm the Journalists' Data, (ii) news items appearing in national and international press reviews, subject to prior confirmation by the editorial offices, or (iii) notifications from the editorial office or from the Journalists.

These measures make it possible to safeguard data quality, ensuring its accuracy and that it is kept up to date.

4. Source of the Data and Legal Basis for Processing

Journalists' Data may be provided:

i. by the Journalist or by the editorial office, where the Journalist works with an editorial office; or

ii. directly by the Registered Journalist who independently registers on the Platforms and provides their own data when creating their personal account.

Where the data are provided by the data subject (Journalist or Registered Journalist), the legal basis for processing is the performance of the service requested by the Journalist.

Where the data are not provided by the data subject, the legal basis is the legitimate interest of the Data Controller in providing a service that meets market needs and the legitimate interest of the editorial office in benefiting from a service that optimises the feed of press releases. The service offered through MEDIADDRESS also serves the interest of the community in receiving complete and accurate information, as well as the interest of subscribers, website visitors and registered or unregistered users of the Platforms ("Users") in promptly identifying the Journalist and the media outlet for the publication of their press release. In accordance with the Privacy Legislation, the Data Controller has carried out a Legitimate Interest Assessment and a privacy impact assessment, which took into account, among other factors, the professional nature of the Journalists' Data, their use strictly connected with journalistic activity, and the benefits in terms of data accuracy and of the control over such data guaranteed to Journalists.

5. Recipients

We share Journalists' Data only in the ways described in this Privacy Notice or as otherwise required by applicable law.

We share Journalists' Data with our Users in connection with the provision of our products and services.

Users may contact Journalists by sending press releases and other communications through the Platforms. Such communications may contain tracking pixels, which detect whether the communication has been opened and record the date and time of openings, in order to measure their performance. The Journalist may at any time choose whether to (i) continue receiving communications with tracking, (ii) continue receiving them without tracking, or (iii) stop receiving them altogether, through the link contained in each communication or by writing to privacy@mediaddress.eu. Withdrawal does not affect the lawfulness of processing carried out prior to the withdrawal. These choices operate vis-à-vis the Data Controller and apply to all communications sent through the Platforms.

For the purposes set out in Section 3, Journalists' Data may be shared with:

a) press offices of private companies, of Public Administrations and of independent national authorities;

b) information companies, whether belonging to the Mediaddress group or not, which provide editorial offices and press offices in Italy and in other European Union countries with services similar to ours (the categories of recipients referred to in letters a) and b) are defined as "Users");

c) persons authorised by the Data Controller, pursuant to Article 29 of the GDPR, to process Journalists' Data as necessary to carry out activities strictly related to the provision of our products and services, who have undertaken to maintain confidentiality or are subject to an appropriate legal obligation of confidentiality;

d) entities typically acting as data processors pursuant to Article 28 of the GDPR, namely: (i) persons, companies or professional firms providing the Data Controller with legal and information technology assistance and consultancy, (ii) parties entrusted with technical maintenance activities, and (iii) service providers used by the Data Controller to achieve the

purposes set out in Section 3 (e.g. providers of server hosting, mailing list distribution, electronic communication systems and data processing services); always in compliance with the principle of data minimisation, limiting processing to the data strictly necessary to achieve the specific purpose;

e) persons, entities or authorities to whom the Journalists' Data must be disclosed pursuant to provisions of law or orders issued by the authorities;

f) other third parties, subject to the Journalists' prior consent where applicable.

Such parties are hereinafter collectively referred to as the "Recipients".

In its contractual relationships with Recipients, the Data Controller takes the necessary precautions to ensure that Journalists' Data are processed by Recipients exclusively for the purposes described above and in compliance with the Privacy Legislation.

6. Retention Period

The Data are retained for the period strictly necessary to achieve the purposes described above. In determining that retention period, the following criteria are taken into account: (i) the accuracy of the data; (ii) the frequency of publication of the media outlet; and (iii) any cessation of journalistic activity.

Data collected through tracking pixels are retained for the time necessary to measure performance and, in any event, no longer than until consent is withdrawn.

7. Right to Object

Since the processing of Journalists' Data described in Sections 3 and 4 is based on the existence of a specific legitimate interest and on the balancing of that interest against the data subject's interest in the confidentiality of their own data, the data subject has the right to object at any time, for any reason, to the processing of their data by written communication sent to privacy@mediaddress.eu.

The tracking referred to in Section 5 is based on consent and is governed by the withdrawal mechanism described therein, rather than by the right to object.

8. Transfers to Third Countries

Some of the Recipients indicated above are based in Third Countries and may therefore process data in such Third Countries. When selecting our service providers or data processors, we consider establishment in a country within the European Economic Area to be a preferential factor. Where our choice falls on an entity based in a Third Country, or in any event whenever we disclose data to entities based in a Third Country, we assess the adequacy of the measures adopted by the recipient in order to ensure an adequate level of data protection, and we enter into the Standard Contractual Clauses.

9. Other Rights of the Data Subject

The data subject also has the right to obtain confirmation as to whether their data exist, to request access to their data, to know which data have been collected, to request their rectification or erasure in the cases provided for by Article 17 of the GDPR, the anonymisation or the restriction of the processing of data concerning them, as well as to receive their data in a structured, commonly used and machine-readable format, in the cases provided for by Article 20 of the GDPR.

In the event of erasure of the data, we reserve the right to retain the name and an indication that the data have been erased, on the basis of our legitimate interest in being able to demonstrate, at the time the request is fulfilled, that the erasure has been carried out.

This processing serves a twofold purpose: to prevent the data from being included in the database again, and to signal to Users that the absence of the data subject's contact details is attributable to the exercise of a data subject right and not to a deficiency in the database.

In any event, the data subject has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) pursuant to Article 77 of the GDPR if they consider that the processing of their data is contrary to the Privacy Legislation in force.

10. Contacts

The Data Controller may be contacted at any time at the address indicated above or at the email address privacy@mediaddress.eu for the exercise of the rights referred to in Sections 7 and 9, or for any question concerning the processing of Journalists' Data.

11. Updates

The Data Controller reserves the right to amend or update the content of this Privacy Notice, in whole or in part, including as a result of changes to the applicable legislation. The Data Controller therefore invites data subjects to visit this section regularly to read the updated version of the Privacy Notice.

Disclaimer
This document has been translated automatically. The original Italian version is the sole legally binding text, and in the event of any discrepancies or interpretative conflicts, the Italian original shall prevail.