# Privacy Policy

**Last Update**: 02/01/2026

## 1. Data Controller and Roles

### 1.1 Identity of the Provider

LetzFair S.r.l. (hereinafter "LetzFair", "we", or "our") provides a digital event engagement platform delivered via Software as a Service (SaaS) mode (the "Platform").
Our Platform enables event organizers (the "Organizers") to create and manage Events, making them accessible to registered individuals (the "Participants") and participating commercial or professional entities (the "Exhibitors").

The Platform aims to facilitate interaction between Participants and Exhibitors, allowing them to share content, connect, and develop their professional network before, during, and after events, as well as within their respective communities.

The term "Services" refers to the set of digital features provided by LetzFair through the Platform (accessible via web and iOS/Android mobile applications), including, but not limited to: user profile management, access to event programs and content, networking and messaging tools, AI-based matchmaking systems, interactive maps, and lead generation features dedicated to Exhibitors.

### 1.2 Roles in Data Processing (Controller vs. Processor)

In accordance with Regulation (EU) 2016/679 (GDPR), LetzFair operates with distinct roles depending on the nature of the service provided:

- Data Processor: In most circumstances, when the User participates in events organized by third-party clients ("Organizers"), LetzFair acts exclusively as the provider of the technological infrastructure on behalf of the Organizer. In such cases, the Organizer is the sole Data Controller, and LetzFair processes data according to their instructions.
- Data Controller: LetzFair assumes the role of Controller when determining the purposes and means of processing regarding the User's general account data on the Platform, browsing data on the letzfair.com website, LetzFair's direct marketing activities, and in the specific case of "LetzFair Events" organized and promoted directly by the company.

## 2. About this Policy

### 2.1 Object of the Policy

This Privacy Policy (the "Policy") describes how LetzFair S.r.l. collects, uses, shares, retains, and protects the personal data of the User of the event engagement Platform (delivered in SaaS mode) and associated mobile applications (iOS and Android) and any other related service. This Policy applies indiscriminately to all users accessing our services, including Participants, Exhibitors, and those browsing or interacting with the Platform as visitors or guests (hereinafter, jointly, the "User").

*2.2 Territorial Scope*

This Policy applies to the User regardless of their geographic location globally. LetzFair is committed to strictly complying with data protection laws and regulations in force in all jurisdictions where it operates, with particular reference to, but not limited to, the General Data Protection Regulation (GDPR - EU Regulation 2016/679).

**3. Types of Information Collected**

LetzFair collects information about Users in several ways: directly from the User, automatically through the Services, or from the Event Organizer.

*3.1 Information provided directly by the User*

To provide the Services, register, and create a profile, we collect the following categories of data:

- Identification and Contact Data: First name, last name, email address, postal address, phone number, and login credentials (password).
- Professional Data: Job title, company, professional biography ("Bio").
- User Content: Information voluntarily shared during the use of interactive services, including profile photos, expressed preferences, and responses to surveys or feedback.

Most of the information listed above is optional. Required fields will be marked by an asterisk (*) and their type may vary from event to event based on the Organizer's configurations.

*3.2 Information collected automatically*

When accessing and using the Platform, IT systems automatically acquire certain technical information necessary to ensure the security and functioning of the service:

- Device and Browsing Data: IP address (Internet Protocol), browser type, device characteristics, operating system, language preferences, referring URL, and device name.
- Usage Data and Logs: Information on how and when the User interacts with the Services, access times, pages visited, and online activity history.
- Geolocation Data: Approximate location derived from the IP address or device settings.
- Performance Data: Error reports, crash logs, and page loading times, necessary to ensure service stability.

*3.3 Information received from Organizers*

If the User participates in an event hosted on the Platform, the Event Organizer may share certain information regarding the User with LetzFair, such as:

- Identification Data: Full name, profile picture, and title.
- Contact Data: Email address and phone numbers.
- Professional Data: Job title, company or organization, and industry.
- Registration Data: Details contained in the event registration form, ticket type purchased, and registration group.
- Custom Field Information: Data collected via specific fields configured by the Organizer and tailored to the event type, as provided by the User during registration.

*3.3.1 External Registration Systems, Login and Single Sign-On (SSO)*

- External Registration Systems: If the Organizer uses external ticketing or registration platforms integrated with LetzFair, we automatically receive the registration details at the time of sign-up.
- Login and Single Sign-On (SSO): If access to the Platform occurs via corporate credentials or the Client's authentication system (SSO), we collect the authentication and profile data transmitted by the Organizer's identity provider. In such cases, the Organizer acts as the Data Controller and ensures that it has obtained the necessary consent to transfer such data to LetzFair.

Regarding any personal information received from Organizers, it is specified that the Organizer acts as the sole Data Controller. Consequently, the Organizer is solely responsible for ensuring that the User has been adequately informed and that all necessary consents and authorizations for the transfer and processing of such information have been validly obtained in accordance with applicable privacy laws.

**4. Purposes and Legal Basis for Processing**
We process personal data exclusively in the presence of a suitable legal basis:
- Performance of Contract (Art. 6.1.b GDPR): To allow registration, Account management, access to events, use of networking features, and to fulfill contractual obligations under the Terms of Use.
- Legitimate Interest (Art. 6.1.f GDPR): To ensure Platform security, prevent fraud, analyze service usage to improve features (via aggregated and anonymized data), and defend LetzFair's rights in legal proceedings.
- Consent (Art. 6.1.a GDPR): For specific purposes such as sending marketing communications (where required), using non-technical cookies, or activating specific optional features. Consent is revocable at any time.
- Compliance with Legal Obligations (Art. 6.1.c GDPR): To comply with laws, regulations, or orders from competent authorities (e.g., tax retention).

*4.1 Detail of Purposes*
Specifically, we process information for the following purposes:
1. For the operational functioning of the Platform;
2. For the improvement and evolution of the Platform;
3. To communicate with the User;
4. To ensure security and legal compliance.

*4.2.1 Essential Platform Operations*

We need User information to:

- Set up and manage the Account and user profiles;
- Grant access to events and Platform features (web and mobile);
- Manage registrations and enable payment processes (handled via third-party providers);
- Support active participation in events (e.g., networking features, appointment scheduling, and agenda);
- Facilitate connection and communication with other Users (Participants and Exhibitors);
- Provide technical assistance and customer support.

*4.2.2 Platform Improvement*

We also use information to:

- Improve user experience (UX) and the interface;
- Develop and test new features;
- Analyze Platform performance (via aggregated data);
- Train and refine our technology and Artificial Intelligence models to provide more precise recommendations;
- Fix bugs and troubleshoot technical issues.

*4.2.3 Communication with the User*

We use information to:

- Send important service notifications regarding Platform operation;
- Keep the User updated with essential information regarding events they are registered for and their Account;
- Respond to questions, support requests, or complaints;
- Share marketing and promotional updates, but exclusively if the User has provided specific consent.

*4.2.4 Security and Compliance*

Finally, we use information to:

- Protect the Platform from fraud, abuse, and unauthorized access, maintaining general infrastructure security;
- Verify User identity if necessary;
- Fulfill our legal and tax obligations;
- Resolve disputes and defend LetzFair's rights in court.

## 5. Use of Artificial Intelligence (AI)

LetzFair integrates Artificial Intelligence technologies to enrich the User experience. The use of such technologies is governed by the following specific clauses:

- Matchmaking and Recommendations: The Platform uses algorithms to analyze profiles and suggest professional connections, exhibitors, or relevant content ("Matchmaking").
- Virtual Assistant (Chat Assistant): The Services include an automated chat system based on Generative AI to provide immediate support.

- Model Training: The User acknowledges that data provided during interaction with the virtual assistant may be processed for technical support purposes and for training and improving AI models.
- Exclusion of Warranty (Hallucinations): AI-generated content may contain inaccuracies or errors ("hallucinations"). Such systems provide first-level support and do not replace professional human judgment. LetzFair does not guarantee the absolute correctness of responses provided by AI.

Despite the use of advanced algorithms to improve the experience, LetzFair guarantees that the content of private messages exchanged between Users and sensitive data are never used for AI model training nor analyzed by automated recommendation systems.

## 6. Sharing and Disclosure of Data
User personal information may be shared with the following categories of recipients, based on operational and contractual necessity.

### 6.1 Event Organizers
Registration and interaction data related to a specific event are shared with the Organizer, who acts as an autonomous or joint Data Controller. Furthermore, when the User interacts with other subjects on the Platform, Organizers may view specific information regarding such interactions.

- General Statistics (Aggregated Level): LetzFair shares aggregated numerical data with the Organizer (without revealing private conversation details) regarding: Messaging (total number), Platform Usage, and Video Calls.
- Confidentiality and Responsibility: LetzFair never shares the content of private messages or details of individual video calls with Organizers. The Organizer is solely responsible for using User information in compliance with applicable privacy laws.

### 6.2 Sharing with Event Exhibitors
Interaction with Exhibitors involves different levels of data sharing depending on the User's action:

- Badge/QR Code Scanning (Physical Events): When the User allows their badge to be scanned or scans an Exhibitor's QR code, they explicitly consent to the transfer of their full contact data (Name, Surname, Company, Email, Phone) to the Exhibitor. This equates to handing over a digital business card.
- Visit to Exhibitor Page/Booth: When visiting a virtual booth, the Exhibitor may view the User's name, job title, and organization.
- Sponsored Sessions: Participation may involve sharing participation data with the session sponsor for reporting purposes.

### 6.3 Limitations and Configurations
The exact information shared may vary based on User profile settings, the specific configuration decided by the Event Organizer, and consent provided where required.

*6.4 Visibility Management and Privacy Options*

LetzFair grants the User full control over their visibility within the Platform. Participation in networking activities is optional.

*6.4.1 Choice of Visibility*

The User can choose, upon registration or via "Privacy Settings", whether to make their profile visible.

- Visible Profile: Name, job title, company, photo, and other "Public" information will be searchable in the participant list.
- Private Profile (Invisible): The User will not appear in the participant list, will not be suggested by Matchmaking algorithms, and will not be accessible to Exhibitors or other Participants.
- Contact Data: Even with a visible profile, direct contact data (email and phone) remain private unless the User voluntarily shares them via active interaction (e.g., "Connect", Chat, or Badge Scan).

*6.4.2 Prohibition of Abuse and Spam*

Access to other participants' contact data is strictly subject to conduct rules. Users are expressly forbidden from using data visible on the Platform for:

1. Mass spamming or unsolicited commercial communications;
2. Scraping or automated data collection;
3. Purposes not strictly related to the event or professional networking.

Violation may result in immediate Account suspension.

*6.5 Business Transfers*

In the event of a merger, sale of assets, financing, or acquisition, data may be transferred to the successor company.

*6.6 Service Providers (Third Parties)*

To ensure the delivery and security of the Platform, LetzFair uses selected third-party service providers ("Sub-processors"). These include:

- Infrastructure and Hosting: Servers located in Milan, Italy, ensuring data residency within the European Economic Area (EEA).
- Payment Management: Managed entirely by certified third-party providers; LetzFair does not store credit card data.
- Artificial Intelligence: Providers for matchmaking and virtual assistants.
- Communication: Services for automated transactional emails.

Below is a list of our data processors (or categories), their location, and guarantees adopted:

| Name | Function | Location | Protection |
|---|---|---|---|
| Amazon Web Services | Cloud services | European Union (EU) | Not required |
| Brevo | Marketing campaigns, transactional emails | France (EU) | Provider based in the European Union, directly subject to the GDPR. The data are not transferred outside the EEA |
| Mapspeople | Virtual mapping tool | Denmark (EU) | Not required. Data processed within the EEA. |
| Microsoft Azure | Hosting, Cloud Computing, Database | Milan, Italy (EU) | Data resides within the EEA. ISO 27001 certified provider. |
| Recombee | AI Recommendation Engine | Czech Republic (EU) | Data processed within the EEA. Subject to GDPR. |
| Stripe | Payment Provider | France (EU) | Not required |

*6.7 Sharing with Public Authorities*
LetzFair may disclose information to competent authorities if required by valid legal requests (court orders, subpoenas) or to comply with legal obligations, always minimizing the data shared to what is strictly necessary.

**7. Localization and International Data Transfer**
LetzFair guarantees data sovereignty within the EU for the main infrastructure.
- Server Location: The server infrastructure hosting data is located in Milan, Italy. Data is therefore stored within the European Economic Area (EEA).
- Extra-EU Transfers: If necessary to transfer data to providers outside the EEA, LetzFair ensures the adoption of adequate guarantees, such as Standard Contractual Clauses (SCC) approved by the European Commission.

**8. Data Retention**
LetzFair retains personal data for the time strictly necessary to achieve the purposes described in this Policy, unless longer retention periods are required by law.

*8.1 Cancellation Policy for Inactivity*
To ensure data minimization, LetzFair reserves the right to delete the User's Account and all associated data if the Account remains inactive for a period exceeding 3 (three) years.

## 9. Data Security

LetzFair adopts adequate technical and organizational measures to protect personal data, including:

- Encryption: Data is encrypted in transit (HTTPS/TLS) and at rest.
- Access Control: Access is limited to authorized personnel and protected by two-factor authentication.
- Backup: Regular backups are performed to ensure resilience.
- Monitoring: Continuous monitoring to detect intrusions.

## 10. User Rights

In accordance with the GDPR, the User has the right to:
- Access: Obtain confirmation of data existence and a copy thereof.
- Rectification: Request correction of inaccurate data.
- Erasure ("Right to be forgotten"): Request deletion of data when no longer necessary.
- Restriction: Obtain limitation of processing.
- Portability: Receive data in a structured format.
- Objection: Object to processing for reasons related to their particular situation.
- Complaint: Lodge a complaint with the competent supervisory authority.

To exercise these rights, the User may contact us at: **info@letzfair.com**.

## 11. Cookies and Tracking Technologies

The Platform uses cookies and similar technologies to ensure service functioning, save preferences, and analyze traffic.

## 12. Processing of Minors' Data

*12.1 Age Limits*

The Platform is not intended for children under 13 years of age. LetzFair does not knowingly collect information from minors under this age.

*12.2 Organizer Responsibility*

If an Organizer chooses to allow registration of minors (e.g., for academic events), the Organizer acts as Data Controller and is solely responsible for obtaining necessary parental consents.

*12.3 Cancellation*

If we become aware that a child under 13 has registered without consent, we will promptly delete their information.

**13. Changes to this Policy**

*13.1 Updates*
LetzFair reviews and updates this Policy regularly. We reserve the right to modify it at any time.

*13.2 Notifications*
In case of significant changes, we will notify the User with reasonable notice via email or in-app notice.

*13.3 Acceptance*
Continued use of the Platform after the effective date of updates constitutes full acceptance of the changes.

**14. Contacts**
For any questions regarding this Policy or to exercise privacy rights, please contact: LetzFair S.r.l. Via Campo Marzio 22d, 42121 Reggio Emilia (RE), Italy Email: info@letzfair.com