

# DATA PROTECTION NOTICE

## EVENTS – PHOTOGRAPHY AND VIDEO RECORDINGS

Pursuant to the Swiss Federal Act on Data Protection (FADP) and EU Regulation 2016/679 (GDPR)

### 1. Data Controller

Field	Information
Company name	Wetag Consulting Immobiliare SA (hereinafter “Controller”)
Registered office	Riva Antonio Caccia 3, 6900 Lugano, Switzerland
Email address	privacy@wetag.ch

### 2. Scope of Application

This notice is provided pursuant to Art. 19 FADP and Arts. 13 and 14 GDPR and applies to the processing of personal data – in particular photographs and video recordings – of natural persons attending events organised by the Controller. Events may also be held in collaboration with partner organisations.

Photographs and videos constitute personal data within the meaning of Art. 5 FADP and Art. 4 GDPR where the individuals depicted are identifiable.

### 3. Purposes of Processing

Photographs and video recordings are made exclusively for the following purposes:

Purpose	Description
Brand promotion	Publication on the Controller’s website and social media channels, including but not limited to LinkedIn, Instagram, Facebook, YouTube and Vimeo, to communicate the Controller’s activities and events.
Institutional materials	Production of print and digital materials (brochures, presentations, newsletters) for the Controller’s institutional representation.
Public relations and media	Distribution of advertorial articles and press releases to local publications (including but not limited to Ticino Welcome and Magazine) and limited use in PR activities.
Internal archive	Retention of photographs and videos in internal archives for historical documentation of events.

Images will not be used for purposes other than those indicated above, nor transferred to third parties for their own commercial purposes.

## 4. Legal Basis for Processing

The processing of personal data (photographs/videos) is based on the explicit consent of the data subject, obtained prior to or at the time of registration at the event.

Regulation	Legal basis
FADP (Switzerland)	Art. 31 para. 1 FADP – the data subject’s consent constitutes a justification for processing. Consent is given freely, specifically, in an informed and unambiguous manner.
GDPR (EU/EEA)	Art. 6(1)(a) GDPR – processing is lawful where the data subject has given consent to the processing of their personal data for the purposes indicated. The GDPR applies to participants residing in the EU/EEA.

Consent is documented through the registration form (paper or digital). The data subject may withdraw consent at any time without prejudice to the lawfulness of processing carried out prior to withdrawal.

## 5. Categories of Personal Data

In connection with events, the Controller processes exclusively the following categories of data:

- Photographs of participants
- Video and audio recordings of the event
- First and last name of the participant (solely for the purpose of managing consent and registration)
- Record of participation in the event (contact data for organisational purposes)

No data belonging to special categories (sensitive data) within the meaning of Arts. 5 FADP and 9 GDPR is collected.

## 6. Recipients of Data

Photographs and videos may be shared with the following parties:

Recipient	Description
Internal staff	The Controller’s professional photographer and web specialist, limited to post-production and publication tasks.
Event partners	Co-organising organisations (joint controllers) may receive photographs of the shared event exclusively for the same purposes described in section 3.
Social media platforms	LinkedIn, Instagram (Meta), Facebook (Meta), YouTube (Google), Vimeo: independent entities whose terms of service apply to published images.
Press and media	Local publications (e.g. Ticino Welcome, Magazine and similar) for the publication of advertorial articles and press releases.
Technical service providers	Hosting, CRM and communication service providers acting as data processors pursuant to Art. 28 GDPR / Art. 9 FADP.

Recipients are located in Switzerland or in countries with an adequate level of data protection recognised by the Swiss Federal Council (e.g. countries of the European Economic Area). Some of the platforms listed above (Meta, Google, Vimeo) may transfer data to the USA; such transfers are governed by the Data Privacy Framework Programme to which these platforms adhere.

## 7. Retention Period

Personal data (photographs/videos) will be retained for the period strictly necessary to fulfil the purposes indicated:

Category	Retention period
Images published online	For the entire period of active promotional use; subsequently removed upon request or upon expiry of the defined period of use.
Internal archive	Up to 5 years from the date of the event, unless consent is withdrawn earlier.
Print materials	For the duration of distribution; copies already distributed cannot be recalled.
Consent (documentation)	For the entire duration of image retention and for applicable limitation periods (10 years in Switzerland).

## 8. Rights of Data Subjects

Data subjects may exercise the following rights against the Controller at any time:

Right	Description
Right of access	Obtain confirmation of processing and a copy of the data relating to them.
Right to rectification	Request the correction of inaccurate or incomplete data.
Right to erasure	Request the removal of their images from the Controller's communication channels.
Right to object	Object to processing based on legitimate interests.
Right to withdraw consent	Withdraw consent at any time without retroactive effect.
Right to data portability	Receive data in a structured, machine-readable format.
Right to restriction	Request restriction of processing in certain circumstances.

Requests should be sent by email to: [privacy@wetag.ch](mailto:privacy@wetag.ch) or by post to the Controller's registered address.

## 9. Right to Lodge a Complaint

Data subjects have the right to lodge a complaint with the competent supervisory authority: in Switzerland, the Federal Data Protection and Information Commissioner (FDPIC); in the EU, the data protection authority of the EU Member State of the data subject's residence.

## 10. Joint Controllers

Where events are organised in collaboration with partner organisations, photographic and video data may also be processed by the co-organiser for the same promotional purposes. In such cases, the Controller and the co-organiser act as joint controllers pursuant to Art. 26 GDPR. The agreement between joint controllers governs their respective responsibilities and the point of contact for data subjects.

## 11. Security Measures

The Controller adopts appropriate technical and organisational measures to protect personal data against loss, unauthorised access, alteration or disclosure. Such measures include technical, physical and organisational safeguards. However, given the nature of the Internet as an “open network”, the Controller cannot guarantee that data will not be intercepted or accessed by unauthorised third parties.

## 12. Updates to This Notice

This notice may be updated at any time to reflect regulatory or operational changes.

Last updated: 02.03.2026

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