



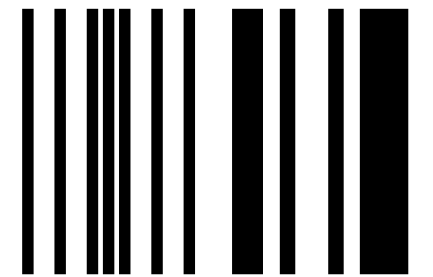
scanning @ events

how it is effected by GDPR

www.circdata.com

what, if anything, has changed?

A long time ago, badges just used to have names on them. Then someone came up with the fab idea of putting barcodes on them, so that instead of carrying around pockets full of business cards (which would always run out too soon), visitors could just let the stand holders and exhibitors scan their badge to transfer across their details. No more losing all of those leads on the way back to the office and the marketing team didn't have to spend hours on data entry.



'GDPR hasn't changed this: the barcode represents a virtual business card which the visitor asks the event organiser to pass on to you, the exhibitor, when they allow their badge to be scanned.'

can we still do this under GDPR?

'Absolutely - all that has changed is that you need to understand the privacy principles around the process - and it is actually very simple.'



- In the context of an exhibitor or commercial partner scanning a visitor's badge, this is always voluntary: unless your stand staff are magicians of some kind, it is practically impossible to scan a badge without asking first. It is an open and transparent process.
- It is reasonable to presume that the visitor knows that you are scanning their badge as a way of collecting their contact details to send them relevant information after the event or to fulfil a specific enquiry (but not necessarily to be deluged with general marketing newsletters).
- This act of transferring data at the request of the visitor means that you become the data **CONTROLLER** of these details and consequently responsible for the compliant use, storage, security etc. under the terms of the GDPR.
- If the you are based in a country outside of the EEA then the transfer could be deemed as permitted under Article 49 (c) - providing it is a one-off transfer but do check the legislation and discuss anything you are worried about with your compliance team.

the Organisers' responsibilities

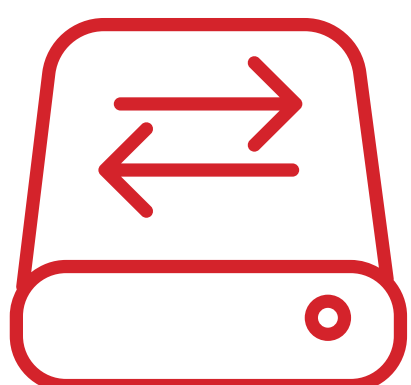
'Making sure everyone knows - without using lots of legal verbiage everywhere'

- The act of a visitor permitting their badge to be scanned is implied consent - so organisers don't need to try and get consent before the event via the registration form - for all sorts of reasons.
- BUT - remember what a visitor who allows you to scan their badge is expecting you to do. It's a virtual business card - so just check what information is being sent across and be mindful of of the regulations around particular types of data like mobile phone numbers which needs to be treated with caution and care.
- You will have your own obligations once you have the actual data. You become the controller because the data subject gave it to you directly (Article 13) and you are responsible for processing it in compliance with the applicable data protection laws.
- Take some time to brief your team so that they can let visitors know what happens when they permit their badge to be scanned - if you want to add some signage on your stand, go ahead.



what is Circdata's role?

'The provider of the technology'



- The official term for Circdata in this procedure is that it is the data **PROCESSOR**, i.e. we are contracted by the event organiser to manage all registration data procedures.
- Part of this service is that we provide the equipment and services needed, on a rental basis, to read the barcodes and effect the transfer of the data (at the visitor's request) to the relevant exhibitor/sponsor or commercial partner.
- We act under the direct instruction of the data **CONTROLLER**, i.e. the event organiser as laid out in the provisions of the GDPR.