



Rosario Imperiali d'Afflitto

Date of birth: 19/05/1953

Nationality: Italian

Gender: Male

CONTACT

via Torno 34,
22100 Como, Italy

via Lucerna, 3, apt. 8.01
6900 Lugano, Switzerland

rosario.imperiali@imperialida.com

(+39) 335452276

(+41) 793158076

www.houseofdataimperiali.com

LinkedIn: <https://www.linkedin.com/in/rosarioimperiali/>

EDUCATION AND TRAINING

05/07/2019 – 05/07/2023 – via Cornalia 19, Milano, Italy

Certified DPO

AICQ SICEV

www.aicqsicev.it

15/03/2018 – 15/03/2022 – via Cornalia 19, Milano, Italy

Certified Lead Auditor ISDP(c)10003

AICQ SICEV

www.aicqsicev.it

15/03/2018 – 15/03/2022 – via Cornalia 19, Milano, Italy

Certified Privacy Assessor

AICQ SICEV

www.aicqsicev.it

25/06/2016 – CURRENT – Italy

Admitted before the Supreme Court (Corte di Cassazione)

Bar Council

14/11/1985 – CURRENT

Admitted to the Italian Bar

Bar Council

04/02/1988

Management

IBM Advanced Management School

Field(s) of study

- Business, administration and law : *Management and administration*

09/1971 – 27/10/1976 – Corso Umberto I 40 , Napoli, Italy

Doctor in law

Università degli studi Federico II - Napoli

cum laude | Workers' right to codetermination | www.unina.it

WORK EXPERIENCE

03/02/2022 – CURRENT – Italy

Founder and Chairman

Officine Dati - No profit association

21/10/2021 – CURRENT – Lugano, Switzerland

Founder

Dataism Sagl

Special proxy

06/01/2020 – CURRENT – Milano, Italy

Founder

House of Data Imperiali

It provides integrated services to companies in the field of data protection and data security. It provides the legal information service with weekly episodes on the subject of privacy. With the Observatory that is part of it (www.houseofdataimperiali.com), it carries out research and surveys and directs the laboratory that manages the web portal on data usage (dptel.imperialida.com). The portal is a training and in-depth tool on the protection of personal data and is an essential vehicle for increasing the cultural development of the subject matter in the company's internal organizational structure.

04/09/2019 – CURRENT – Milano, Italy

Founder

Studio Legale Imperiali d'Afflitto

He assists companies in legal activities concerning the management, protection and storage of personal data and technology law.

Taking advantage of over thirty years of experience in the field, he plays the role of DPO at international companies and groups and as specialized lawyer with a practical and concrete approach, aiming at the efficiency of the processes. It organizes and conducts training and specific training seminars for professionals involved in personal data management processes such as DPOs, managers and privacy professionals.

2015 – CURRENT – Milano, Italy

Law teacher

AlGI - National School of Specialization for Corporate Lawyers

He lectures on data protection.

2011 – CURRENT – Lugano, Switzerland

Chief editor

Workstyle Magazine

https://workstyle.assolo.net/talks/?page_id=29
workstyle.ch

10/10/1997 – CURRENT – Milano, Italy

Freelance journalist

Il Sole 24 Ore

As a freelance journalist he publishes editorial and comments on topics related to data protection. He also runs the "Esperto Risponde" (The Expert Answers) service for Il Sole 24 Ore, on the subject of data protection.

05/05/1997 – 10/06/2021 – Napoli - Milano, Italy

Founder

Studio Legale Imperiali

He co-founded with another partner and led the Imperiali Law Firm, a professional association with head offices in Naples and Milan, whose main activity was data protection.

05/05/1997 – 10/06/2021 – Napoli, Italy

Founder

Gruppo Imperiali srl

He co-founded with another partner and headed the Gruppo Imperiali company, made up of professionals from various disciplines and which provided data protection services to companies.

1997 – 2017 – Torino, Italy

Chairman of Committee for telematic self-regulation

ANFOV - Associazione per la Convergenza nei servizi di comunicazione

01/09/2005 – 01/09/2008 – Castellanza - Varese, Italy

University law teacher

LIUC University C. Cattaneo

He was assigned the chair of Information and Communication Law.

01/04/1983 – 05/05/1995 – Milano, Italy

Corporate counsel

IBM Italy

After seven years of activity as a corporate lawyer at an international law firm, he was hired by IBM Italy where he created and led the Legal Studies department, then adding further assignments in the legal department. In the two-year period 1992-1994 he was assigned to the headquarters in Armonk, NY, USA where he was part of the team for the implementation of the distribution channels of IBM products in the USA. In 1994-1995 he was appointed European general counsel of the subsidiary IBM-ISSC for the IT outsourcing sector.

LANGUAGE SKILLS

MOTHER TONGUE(S): Italian

OTHER LANGUAGE(S):

English

Listening
C1

Reading
C2

**Spoken
production**
C1

**Spoken
interaction**
C1

Writing
C1

DIGITAL SKILLS

Google Drive / Zoom / Google Docs / Social Media / Microsoft Office (Excel PowerPoint Word) - advanced level / Online content creation and editing tools / Problems solving and decision making / Team-work oriented

COMMUNICATION AND INTERPERSONAL SKILLS

● **Communication skills**

High communication skills

● **Organisational and management skills**

High organisational and management skills

● **Professional skills**

Skills in teaching, writing, communication, consulting, with specific reference to the field of data protection and new technology law.

PARLIAMENTARY HEARINGS

07/06/2018

● **Hearing in the Senate of the Republic for the draft legislative decree concerning the national regulation for adaptation to the GDPR**

l'atto del Governo n. 22

http://www.senato.it/application/xmanager/projects/leg18/attachments/documento_evento_procedura_commissione/files/000/000/136/OSSERVATORIO_679.pdf

15/06/2017

● **Hearing in the Senate of the Republic on Whistleblowing**

http://www.centrostudiambrosoli.it/images/img_editor/Audizione_16.5.17.pdf

PUBLICATIONS

- **Nuove tecnologie e tutela della riservatezza dei lavoratori**
1988 https://www.francoangeli.it/Ricerca/scheda_libro.aspx?Id=6944
- **La tutela dei dati personali**
1997
Publisher - Il Sole 24 Ore
- **La tutela della privacy in azienda**
1999
Publisher - Il Sole 24 Ore
- **Il trasferimento all'estero dei dati personali**
2003
Publisher - Il Sole 24 Ore
- **Commentario Codice della privacy**
2004
Publisher - Il Sole 24 Ore
- **La gentile brezza del riserbo**
2012
The way of being of the man of the news society
- **Annuario 2013**
2013
Collection of editorials on the major data protection news of the year
- **Annuario 2014**
2014
Collection of editorials on the major data protection news of the year
- **Guida pratica per le aziende**
2014 https://books.google.it/books?id=j30TEAAAQBAJ&pg=PR11&lpg=PR11&dq=rosario+imperiali&source=bl&ots=TXHWM--JRN&sig=ACfU3U1r_QDp1XwQxxKurEv0od_cCRdKVQ&hl=it&sa=X&ved=2ahUKewj74LzLtg7yAhVphf0HHT5iAjE4WhDoAXoECAIQAw#v=onepage&q=rosario imperiali&f=false
Publisher - Frizzera - Il Sole 24 Ore
Section on privacy
- **Annuario 2015**
2015
Collection of editorials on the major data protection news of the year
- **Annuario 2016**
2016
Collection of editorials on the major data protection news of the year
- **Annuario 2017**
2017
Collection of editorials on the major data protection news of the year
- **Cybersicurezza 05 - La nuova privacy**
2018
Il Sole 24 Ore
Co-author

- **Annuario 2018**
2018
Collection of editorials on the major data protection news of the year
- **Annuario 2019**
2019
Collection of editorials on the major data protection news of the year
- **Nuovi conflitti tra privacy e salute**
2020
Publisher - AYROS
- **Rapporto privacy 2021 - Temi e dibattiti del 2021 sulla protezione dei dati personali**
2022 <https://www.keyeditore.it/libri/rapporto-privacy-2021/>
- **Servizio di Informazione Giuridica (SIG)**
Since 2013 - Current
Weekly articles on main data protection topics, published in the GDPR Platform provided by House of Data Imperiali.

NEWSPAPER ARTICLES SINCE GDPR

- 10/05/2021**
● **Lo Studio delega a terzi? Serve il certificato di avvenuta distruzione**
- 10/05/2021**
● **Privacy, dati di collaboratori e clienti da cancellare se inutili o scaduti**
- 21/06/2020**
● **Gli esperti di protezione dati e le preoccupazioni per l'app Immuni**
- 04/03/2020**
● **Corruption is an Improper Performance**
Human resources managers play a great role in shaping the compliance program and disseminating the company's policy based on ethics and anti-corruption behavior amongst their fellow employees.
<https://workstyle.ch/corruption-improper-performance/>
- 08/11/2018**
● **Un registro per combattere le chiamate indesiderate**
- 30/10/2018**
● **L'obbligatorietà del registro dei trattamenti solleva polemiche**
- 24/05/2018**
● **A chi si applica il Regolamento sulla protezione dei dati? Quali dati personali riguarda e come vengono distinti?**
- 18/05/2018**
● **Ho predisposto l'informativa e la raccolta del consenso?**
- 17/05/2018**
● **Identity in the workplace**
The employer is the "commander in chief", the person who organizes tools for production of goods or for supply of services by means of his own financial assets. He pilots his own concern by leveraging the available gears: the workforce amongst all.
<https://workstyle.ch/identity-workplace/>
- 02/2018**
● **Privacy - La nuova disciplina europea**
Publisher - Il Sole 24 Ore
- 27/11/2017**
● **Trattamento dati obbligatorio, aziende al lavoro per il budget**
- 05/04/2017**
● **Privacy, incentivata la certificazione in via autonoma**
- 12/01/2017**

- **Privacy internet, dalla UE protezione anche sui metadati**
26/03/2018
- **DPO: La mancata designazione fa scattare sanzioni salate**
29/03/2018
- **Dati personali ad ampia tutela**
The GDPR provides for homogeneity of discipline in Europe and imposes an organizational model on companies
29/03/2018
- **Si estendono i confini territoriali della protezione**
29/03/2018
- **Nell'e-commerce acquirenti tutelati**
The online transaction is protected in the same way as traditional trading. With extension to payments
29/03/2018
- **Le banche - Nuovo assetto organizzativo e spazio al data protection officer**
29/03/2018
- **Le assicurazioni - Test sull'impatto e portabilità dei dati per le polizze**
29/03/2018
- **Le opinioni politiche - La propaganda equiparata a marketing: serve il consenso**
29/03/2018
- **Dati digitali - Social network, la tutela parte dalle scelte dell'utente**
25/04/2018
- **Nei primi sei mesi ci sarà tolleranza**
Il Sole 24 Ore
22/04/2018
- **Domande e risposte sul GDPR**
Il Sole 24 Ore
25/04/2018
- **Effetti da limitare in caso di incidente**
Le violazioni. Un fenomeno che appare inarrestabile.
Il Sole 24 Ore
25/04/2018
- **Il sistema di sicurezza diventa multifunzionale**
Le misure vanno estese ai fornitori che trattano le informazioni per conto di clienti
Il Sole 24 Ore
03/05/2018
- **GDPR Ancora correzioni alla vigilia del debutto**
Da Bruxelles. Così si cancellano gli errori formali.

Il Sole 24 Ore

14/05/2018

● **DPO - Alla designazione si arriva con due mosse**

Esame preliminare. Il primo passo è valutare se la nuova figura serve e il secondo individuare un candidato con competenze adeguate.

Il Sole 24 Ore

24/05/2018

● **Gradi differenti di protezione secondo la sensibilità delle informazioni**

Il Sole 24 Ore

24/05/2018

● **Dal codice privacy italiano alle nuove disposizioni europee**

Il Sole 24 Ore

24/05/2018

● **Il legame tassativo tra informativa e consenso**

Il Sole 24 Ore

24/05/2018

● **Con il GDPR le norme di tutela diventano anche un nuovo standard per il mercato**

Il Sole 24 Ore

24/05/2018

● **Il requisito fondamentale è la chiarezza nei confronti degli interessati**

Il Sole 24 Ore

24/05/2018

● **Il trattamento dei dati nell'Unione europea e oltre**

Il Sole 24 Ore

LAW REVIEW'S PAPERS

1996

● **European Union Directive on Personal Privacy Rights and Computerized Information**

Villanova Law Review - Villanova University - Charles Widger School of Law

<https://digitalcommons.law.villanova.edu/vlr/vol41/iss1/7/>

2013

● **Legitimate interest of the data controller New data protection paradigm: legitimacy grounded on appropriate protection**

Balboni, P., Cooper, D., Imperiali, R. & Macenaite, M. (2013) Legitimate interest of the data controller New data protection paradigm: legitimacy grounded on appropriate protection, International Data Privacy Law (2013) 3 (4): 244-261

https://privpapers.ssrn.com/sol3/cf_dev/AbsByAuth.cfm?per_id=2270691

CONFERENCES AND SEMINARS

- **14/07/2021** > - Webinar - Italian Banking Association
- **La privacy e le direttrici evolutive - La governance dei dati**
- **27/05/2021** > - Webinar Deloitte
- **Proposta EU di regolamento sull'Intelligenza Artificiale - Keynote speaker**
<https://www2.deloitte.com/it/it/pages/risk/events/proposta-eu-di-regolamento-di-intelligenza-artificiale.html>
- **05/05/2021** > - Webinar - Italian Banking Association
- **L'approccio basato sul rischio per la data protection: aspetti organizzativi e procedurali**
- **23/03/2021** > - Webinar - Italian Banking Association
- **Privacy, ispezioni online e sanzioni - Come prepararsi alle ispezioni**
- **16/03/2021**
- **Il ruolo dell'informatore scientifico e la disciplina data protection**
- **09/02/2021** > - Webinar
- **Protezione dei dati personali e contesto tecnologico**
- **05/11/2020** > - Webinar - Italian Banking Association
- **Il sistema documentale data protection previsto dal nuovo Regolamento Europeo**
- **27/10/2020** > - Webinar
- **Certificazioni & codici di condotta. Lo stato dell'arte**
- **18/09/2020** > - Webinar
- **La certificazione nel GDPR. Strumento di compliance**
<https://www.in-veo.com/en/2-uncategorised/495-webinar-la-certificazione-gdpr-dimensione-e-strumento-di-compliance>
- **01/07/2020** > - Webinar
- **Privacy revolution**
<https://ogrtorino.it/events/privacy-revolution-convegno-privacy-unolegal>
- **01/07/2020** > - Webinar
- **Indagine Covid-19 e Privacy**
- **18/03/2020** > - Milano Digital Week
- **La guerra dei dati: primi conflitti tra privacy e salute**

In the relationship between privacy and health, Covid-19 is yet another source of stress. How can health, scientific and pharmacological research companies that manage citizen-patient data move easily and in compliance with regulations?

The House of Data Data Protection Observatory will ask a group of experts, gathered with the aim of spreading awareness on the subject and creating a shared context for the business world.

<https://www.milanodigitalweek.com/la-guerra-dei-dati-primi-conflitti-tra-privacy-e-salute-osservatorio-data-protection/>

22/01/2020 > - Università Statale di Milano

Il ruolo del DPO

<https://inhousecommunity.it/statale-milano-annuario-protezione-dati/>

26/11/2019

Legal Tech - Ambivalenza della tecnologia

23/10/2019 > - IEO - Milano

Health data and security

https://www.ieo.it/Documents/formazione/L123_IEO_pieg_25_ottobre_updated.pdf?epslanguage=it

15/10/2019 > - Bruxelles - EU Parliament

Accountability

https://edps.europa.eu/sites/edp/files/publication/accountability_process_and_tools_to_prove_it_presentationrimperiali_en.pdf

04/10/2019 > - Rome - Italian Insurance Companies Association

Data protection control framework e l'efficace funzionamento del modello organizzativo

20/09/2019 > - Rome

Transfers of personal data to third countries or international organizations

04/06/2019 > - Webinar

La prospettiva del DPO a un anno dall'applicazione del GDPR

10/05/2019 > - Roma - Italian Banking Association

Un anno di GDPR: Scelte e direttrici evolutive - Data protection control framework e l'efficace funzionamento del modello organizzativo

28/03/2019 > - Milano - Italian Banking Association

Il sistema documentale data protection previsto dal nuovo Regolamento Europeo

04/03/2019 > - Milano - Deloitte

Certificazioni Data protection

04/02/2019 > - Rome - Camera dei Deputati - Sala della Lupa

Consapevolezza e responsabilizzazione

21/11/2018 > - Webinar course - Italian Banking Association

Sistema documentale GDPR

19/06/2018 > - Milano - Italian Banking Association

Principi e regole della nuova privacy

29/05/2018 > - Roma - Forum privacy - Italian Banking Association

- **Trattamento e diritti degli interessati: dalla norma all'implementazione**
09/05/2018 > - Senato della Repubblica - Roma
- **Accountability in Europa**
<https://www.osservatorio679.org/documentation/tavola-rotonda-9-maggio.pdf>
17/04/2018 > - Milano - Italian Banking Association
- **Requisiti, compiti e attivita' in pratica del dpo**
28/03/2018 > - Rome -
- **Applicazione del GDPR nelle Infrastrutture Critiche : i principali punti di attenzione**
AICC and University of Rome III
26/03/2018 - 26/03/2018 > - Milan - Italy
- **Privacy expert e data protection officer in banca - 1 day**
06/02/2018
- **Case Study - Controlli a distanza sull'attività dei lavoratori**
<https://www.paradigma.it/iniziativa/case-studycontrolli-distanza-sullattivita-dei-lavoratori/>
22/01/2018 > - Mantova
- **La rivoluzione europea della privacy**
<https://normaprivacy.it/seminario-la-rivoluzione-europea-delle-privacy-gli-atti/>
27/06/2017 > - Roma -
- **GDPR e tecnologie: valutazione di adeguatezza, analisi dei rischi e valutazioni di impatto**
The Armed Forces Communications Electronics Association (AFCEA)
https://s3-eu-west-1.amazonaws.com/bayproduction/system/events/attaches/21716/original/invito_AFCEA_27_giugno_2017.pdf
27/09/2021 - 27/09/2021 > - Webinar
- **Privacy e Salute: una nuova sfida da affrontare**
Organized by Osservatorio HoD in association with Federchimica-Assobiotec, national association for the development of biotechnologies.
04/11/2021 - 04/11/2021 > - Webinar
- **Data protection documentary system - Data breach management - Accountability and Risk Assessment**
Organized by the Education Inhouse company of Italian Banking Association
04/11/2021 - 04/11/2021 > - Webinar
- **Italia Banking Association - Requisiti, compiti e attività del DPO e del Privacy expert in banca**
15/12/2021 - 15/12/2021 > - Webinar
- **Intesa San Paolo - Privacy Day - Privacy e trasferimento dati extra-UE/SEE**
10/02/2022 - 10/02/2022 > - Webinar

● **Temi e dibattiti privacy: cosa ci aspetta nel 2022**

<https://houseofdataimperiali.com/webinar-temi-e-dibattiti-privacy-cosa-ci-aspetta-nel-2022/>

05/04/2022 - 07/04/2022 > - Venice - Italy

● **Privacy Symposium**

Speaker at the Privacy Symposium Conference 2022 on panels:

- "Privacy and the Market: Overlapping between Data Protection and Other Sectoral Regulations"
- "Can We Make Marketing and Advertisement Privacy by Design?"

<https://privacysymposium.org>

21/04/2022 > - Webinar

● **Intelligenza artificiale e umanesimo europeo**

Organized by Officine Dati No profit Association.

<https://www.officinedati.org/it/iniziative/webinar/intelligenza-artificiale-e-umanesimo-europeo/>

16/05/2022 > - Rome - Italy

● **Data Protection Talk - Processo decisionale automatizzato e profilazione**

Organized by Osservatorio 679 No profit Association.

<https://www.osservatorio679.org/it/>

25/05/2022 > - Webinar

● **Come dimostrare l'adeguatezza delle proprie misure tecniche ed organizzative? - Cyber Security Summit**

Cyber Security 360 Summit organized by Agenda Digitale and Cybersecurity360.

<https://www.cybersecurity360summit.it>

10/06/2022 > - Webinar

● **Ricerca sì, ricerca no, ricerca boh?! La Terra dei Dati**

Organized by Officine Dati No Profit Association.