# **Privacy Policy of savesestore.com**

This Application collects some Personal Data from its Users.

## Owner and Data Controller

Savese Srl Via Savona, 9/A, 10040 Rivalta di Torino

Owner contact email: customercare@savesestore.com

## **Types of Data collected**

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Trackers; Usage Data; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; country; operating systems; first name; last name; phone number; email address; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Universally unique identifier (UUID); device information; language; Data communicated while using the service; number of Users; city; session statistics; latitude (of city); longitude (of city); browser information; gender; date of birth; physical address; username; password; geographic position; VAT Number; company name; Tax ID; profession; state; number of employees; website; various types of Data; Data communicated in order to use the Service; User ID; page views.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

#### **Place**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

#### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Displaying content from external platforms, SPAM protection, Analytics, Contacting the User, Platform services and hosting, Handling payments, Tag Management, Remarketing and behavioural targeting, Advertising, Managing contacts and sending messages, Traffic optimisation and distribution, Interaction with live chat platforms, Managing data collection and online surveys, Interaction with data collection platforms and other third parties, Interaction with online survey platforms, Heat mapping and session recording and Registration and authentication provided directly by this Application.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

## Advertising

This type of service allows User Data to be utilised for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Application, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers for identifying Users, behavioural retargeting i.e. displaying ads tailored to the User's interests and behaviour, or to measure ads performance. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### Meta ads conversion tracking (Meta pixel) (Meta Platforms Ireland Limited)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms Ireland Limited that connects data from the Meta Audience Network with actions performed on this Application. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt out</u>.

## Google Ads conversion tracking (Google Ireland Limited)

Google Ads conversion tracking is an analytics service provided by Google Ireland Limited that connects data from the Google Ads advertising network with actions performed on this Application.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

#### Hotjar Form Analysis & Conversion Funnels (Hotjar Ltd.)

Hotjar is an analytics service provided by Hotjar Ltd.

Hotjar honours generic Do Not Track headers. This means your browser can tell its script not to collect any of your data. This is a setting that is available in all major browsers. Find Hotjar's opt-out information here.

Personal Data processed: Trackers; Usage Data.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

## **Analytics**

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

#### Google Analytics (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited ("Google"). Google utilises the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### **AWStats (this Application)**

AWStats is an open-source web analytics software used by this Application to analyse Data directly without the help of third parties. AWStats allows analysing these log files in order to examine web traffic patterns.

Personal Data processed: country; operating systems; Usage Data.

#### **Wordpress Stats (Aut O'Mattic A8C Ireland Ltd.)**

Wordpress Stats is an analytics service provided by Aut O'Mattic A8C Ireland Ltd.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

#### Google Analytics Advertising Reporting Features (Google Ireland Limited)

Google Analytics on this Application has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyse specific behaviour and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### ShinyStat (ShinyStat S.p.a. (SevenData S.p.a.))

ShinyStat (ShinyStat Business, ShinyStat Pro or ShinySta ISP) is an analytics service provided by ShinyStat S.p.a. (SevenData S.p.a.).

This analytics service anonymises the User's IP address.

Personal Data processed: Trackers; Usage Data.

Place of processing: Italy – <u>Privacy Policy</u> – <u>Opt Out</u>.

### **Meta Events Manager (Meta Platforms Ireland Limited)**

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on this Application.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

#### **Google Analytics 4 (Google Ireland Limited)**

Google Analytics 4 is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or

server. Users can learn more by consulting Google's official documentation.

Personal Data processed: browser information; city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

## **Contacting the User**

#### **Contact form (this Application)**

By filling in the contact form with their Data, the User authorises this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: email address; first name; last name; phone number.

#### **Mailing list or newsletter (this Application)**

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data processed: email address; first name.

## Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### YouTube video widget (Google Ireland Limited)

YouTube is a video content visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

#### Video Vimeo (Vimeo, LLC)

Vimeo is a video content visualisation service provided by Vimeo, LLC that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

### **Google Fonts (Google Ireland Limited)**

Google Fonts is a typeface visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

#### OpenStreetMap widget (OpenStreetMap Foundation )

OpenStreetMap widget is a maps visualisation service provided by OpenStreetMap Foundation that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United Kingdom - Privacy Policy.

#### Google Maps widget (Google Ireland Limited)

Google Maps is a maps visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

#### YouTube video widget (Privacy Enhanced Mode) (Google Ireland Limited)

YouTube is a video content visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

This widget is set up in a way that ensures that YouTube won't store information and cookies about Users on this Application unless they play the video.

Personal Data processed: Trackers; Universally unique identifier (UUID); Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

#### Font Awesome (Fonticons, Inc.)

Font Awesome is a typeface visualisation service provided by Fonticons, Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

## YouTube Data API (Google Ireland Limited)

YouTube Data API is a video content visualisation service provided by Google Ireland Limited that allows this Application to incorporate functions normally executed on YouTube so that Users can watch, find, and manage YouTube content directly on this Application.

Through this Service, this Application may collect Data directly or indirectly on or from Users' devices, including by making use of Trackers. Users may restrict such access to their Data via the <u>security settings page</u> provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the <a href="Network Advertising Initiative opt-out page">Network Advertising Initiative opt-out page</a>.

Personal Data processed: Data communicated in order to use the Service; Data communicated while using the service; device information; password; Trackers; Usage Data; User ID; username.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt out</u>.

## TrustBox widget (Trustpilot A/S)

The TrustBox widget is a reviews and ratings service provided by Trustpilot A/S that allows this Application to incorporate that content on its pages.

Personal Data processed: clicks; page views; Trackers; Usage Data.

Place of processing: Denmark – <u>Privacy Policy</u>.

#### Handling payments

Unless otherwise specified, this Application processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Application isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

#### **Stripe (Stripe Technology Europe Ltd)**

Stripe is a payment service provided by Stripe Technology Europe Ltd.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – Privacy Policy.

#### Heat mapping and session recording

Heat mapping services are used to display the areas of this Application that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyse web traffic and keep track of User behaviour.

Some of these services may record sessions and make them available for later visual playback.

#### Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd.

Hotjar honours generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's <u>opt-out information here</u>.

Personal Data processed: Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Application for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

#### Hotjar Recruit User Testers (Hotjar Ltd.)

The Hotjar Recruit User Testers widget is a service for interacting with the Hotjar data collection platform provided by Hotjar Ltd

Hotjar honours generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's <u>opt-out information here</u>.

Personal Data processed: Trackers; Usage Data; various types of Data.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

## Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this Application, in order to contact and be contacted by this Application's support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

## Tawk.to Widget (tawk.to ltd.)

The Tawk to Widget is a service for interacting with the Tawk to live chat platform provided by tawk to ltd.

Personal Data processed: Data communicated while using the service; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

## **Interaction with online survey platforms**

This type of service allows Users to interact with third-party online survey platforms directly from the pages of this Application. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

### Hotjar Poll & Survey widgets (Hotjar Ltd.)

The Hotjar Poll & Survey widgets are services that enable interaction with the Hotjar platform provided by Hotjar Ltd. Hotjar honours generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's opt-out information here.

Personal Data processed: Trackers; Usage Data; various types of Data.

Place of processing: Malta – Privacy Policy – Opt Out.

#### Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

#### MailUp (Growens S.p.A.)

MailUp is an email address management and message sending service provided by Growens S.p.A.

Personal Data processed: email address; first name.

Place of processing: Italy – Privacy Policy.

#### Trustpilot Automatic Feedback Service (Trustpilot A/S)

The Trustpilot Automatic Feedback Service is a message-sending service provided by Trustpilot A/S that automates the sending of email requests for product or service reviews based on specific Users' actions performed on this Application.

Personal Data processed: Trackers; Usage Data.

Place of processing: Denmark – Privacy Policy.

## Managing data collection and online surveys

This type of service allows this Application to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

## Hotjar surveys (Hotjar Ltd.)

Hotjar surveys is a survey builder and data collection platform provided by Hotjar Ltd.

Hotjar surveys may use cookies to track User behaviour. Users can Opt-Out of Hotjar surveys cookie tracking by visiting this opt-out page.

Hotjar surveys respects the Do Not Track option available in most modern browsers that, if activated, sends a special signal to stop tracking User activity. Users can find more information on how to enable Do Not Track for each supported browser <a href="here">here</a>.

Personal Data processed: company name; country; Data communicated while using the service; date of birth; email address; first name; gender; geographic position; last name; number of employees; password; phone number; physical address; profession; state; Tax ID; Trackers; Usage Data; username; VAT Number; website.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

### Platform services and hosting

These services have the purpose of hosting and running key components of this Application, therefore allowing the provision of this Application from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

#### WordPress.com (Aut O'Mattic A8C Ireland Ltd.)

WordPress.com is a platform provided by Aut O'Mattic A8C Ireland Ltd. that allows the Owner to build, run and host this Application.

Personal Data processed: email address; first name; last name; phone number; Trackers.

Place of processing: Ireland – Privacy Policy.

#### PrestaShop (PrestaShop S.A.)

PrestaShop is a platform provided by PrestaShop S.A. that allows the Owner to build, run and host an e-commerce website.

Personal Data processed: device information; email address; first name; language; last name; phone number; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: France – <u>Privacy Policy</u>.

## Registration and authentication provided directly by this Application

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

#### **Direct registration (this Application)**

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data processed: various types of Data.

## Remarketing and behavioural targeting

This type of service allows this Application and its partners to inform, optimise and serve advertising based on past use of this Application by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioural targeting activity.

Some services offer a remarketing option based on email address lists.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### **Facebook Remarketing (Meta Platforms Ireland Limited)**

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms Ireland Limited that connects the activity of this Application with the Facebook advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Google Signals (Google Ireland Limited)

This Application uses Google Signals, a feature of Google Analytics, which will associate the visitation information that it collects from this Application with Google information from accounts of signed-in Google-account users who have consented to this association for the purpose of ads personalisation. This Google information may include User location, search history, YouTube history and Data from sites that partner with Google – and is used to provide aggregated and anonymised insights into Users' cross device behaviours.

If a User falls under the described association, they may access and/or delete such Data via My Activity provided by Google.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Facebook Custom Audience (Meta Platforms Ireland Limited)

Facebook Custom Audience is a remarketing and behavioural targeting service provided by Meta Platforms Ireland Limited that connects the activity of this Application with the Facebook advertising network.

Users can opt out of Facebook's use of Trackers for ads personalisation by visiting this opt-out page.

Personal Data processed: email address; Trackers.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

## Remarketing with Google Analytics (Google Ireland Limited)

Remarketing with Google Analytics is a remarketing and behavioural targeting service provided by Google Ireland Limited that connects the tracking activity performed by Google Analytics and its Trackers with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

#### Google Ads Remarketing (Google Ireland Limited)

Google Ads Remarketing is a remarketing and behavioural targeting service provided by Google Ireland Limited that connects the activity of this Application with the Google Ads advertising network and the DoubleClick Cookie.

In order to understand Google's use of Data, consult Google's partner policy.

Users can opt out of Google's use of Trackers for ads personalisation by visiting Google's Ads Settings.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

## **SPAM** protection

This type of service analyses the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognised as SPAM.

#### **Google reCAPTCHA (Google Ireland Limited)**

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited. The use of reCAPTCHA is subject to the Google <u>privacy policy</u> and <u>terms of use</u>.

The use of ree/11 Territ is subject to the Google privacy policy, and territs of use.

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

## Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralised fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

#### Google Tag Manager (Google Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

## Traffic optimisation and distribution

This type of service allows this Application to distribute their content using servers located across different countries and to optimise their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

#### jsDelivr (jsdelivr.com)

jsDelivr is a traffic optimisation and distribution service provided by jsdelivr.com.

Personal Data processed: Usage Data.

Place of processing: Poland – <u>Privacy Policy</u>.

#### Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimisation and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through this Application, i.e., communication between this Application and the User's browser, while also allowing analytical data from this Application to be collected.

Personal Data processed: Trackers; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

## Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

## Further information about the processing of Personal Data

## Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Application depends on the payment system used.

## **Cookie Policy**

This Application uses Trackers. To learn more, Users may consult the Cookie Policy.

## **Further Information for Users**

## Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

#### Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

#### The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right to obtain the erasure of their Data from the Owner
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

#### Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

#### How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## Additional information about Data collection and processing

#### Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

#### Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

#### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

### Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **Definitions and legal references**

#### Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **Usage Data**

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilised by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

#### **Data Subject**

The natural person to whom the Personal Data refers.

#### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

## **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

#### This Application

The means by which the Personal Data of the User is collected and processed.

#### Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

#### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

#### Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

## Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

## Legal information

This privacy policy relates solely to this Application, if not stated otherwise within this document.

Latest update: 8 March 2024