# **Privacy Policy**

Owner and Data Controller Gemide s.r.l. - Via Seprio, 2 - 20149 Milano (Italia) Owner contact email: gemide@pec.it

# Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies; Usage Data; first name; last name; address; country; email address; ZIP/Postal code; city; Tax ID; gender; physical traits; medical conditions; phone number; VAT Number; company name; province; various types of Data; website.

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 provide 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 to provide the Service requested by the User—in addition to any other purposes described in the cookie policy, found here, and in this privacy policy, where applicable.

USERS ARE RESPONSIBLE FOR ANY THIRD-PARTY PERSONAL DATA OBTAINED, PUBLISHDED, POSTED OR SHARED THROUGH THIS APPLICATION, AND AFFIRM AND AGREE THAT THEY HAVE RECEIVED SUCH THIRD PARTY'S CONSENT TO PROVIDE THE DATA TO THE OWNER. FURTHERMORE, THE USER AFFIRMS AND AGREES THAT ANY THIRD-PARTY DATA SUBJECT WHOSE PERSONAL DATA THE USER HAS PUBLISHED, POSTED OR SHARED USING THIS APPLICATION HAS CONSENTED TO THIS PRIVACY POLICY, OR HAS CONSENTED TO A PRIVACY POLICY OF EQUAL OR GREATER DETAIL.

### Mode and place of processing the Data

### Methods of processing

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

The Data processing is accomplished using computers and/or IT enabled tools, following organizational 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. Users may request at any time the updated list of these parties from the Owner.

### Legal basis of processing

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

- Users have given their consent for one or more specific purposes. Note: Under certain legislation, the Owner may be allowed to process Personal Data until the User objects to such processing ("opt-out"), without having to rely on consent or any of the other following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- processing 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; and/or
- processing is necessary for the legitimate interests pursued by the Owner or by a third party.

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

#### 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 should consult the section in this privacy policy containing details about the processing of Personal Data.

In addition, Users are entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or established by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer occurs, Users can learn more by consulting the relevant section(s) of this privacy policy or inquire with the Owner by using the information provided in the contact section.

#### Retention time

Personal Data shall be processed and stored for as long as required by the purpose for which it has been collected.

#### 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 fulfil such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this privacy policy or by contacting the Owner.

The Owner may retain Personal Data for a longer period whenever the User has given consent to such processing; provided that, such consent not be withdrawn. Furthermore, the Owner may be obligated to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of a governmental authority.

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

# The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Analytics, Contacting the User, displaying content from external platforms, Handling payments, Interaction with external social networks and platforms, managing contacts and sending messages, and Registration and authentication.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective section(s) of this privacy policy.

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

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

#### **Analytics**

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

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Application, 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.

Personal Data collected: Cookies; Usage Data.

Place of processing: US - Privacy Policy - Opt Out.

Google Analytics with anonymized IP (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Application, 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.

This integration of Google Analytics anonymizes the User's IP address. It works by shortening Users' IP addresses within the EU. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

### Contact the User

Contact form (This Application)

By filling in the contact form with their Data, the User authorizes 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 collected: address; city; company name; country; email address; first name; gender; last name; phone number; province; Tax ID; various types of data; VAT Number; website; ZIP/Postal code.

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. The User's 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 collected: company name; email address; first name; last name; phone number; website.

### Displaying content from external platforms

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

Vimeo video (Vimeo, LLC)

Vimeo, LLC provides a video content visualization service that allows this Application to incorporate content of the kind mentioned in the paragraph above on its pages.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – Privacy Policy.

#### **Handling Payments**

Payment processing services enable this Application to process payments by credit card, bank transfer or other means. To ensure greater security, this Application shares only the information necessary to execute the transaction with the financial intermediaries handling the transaction.

Some of these services may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.

PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments. Personal Data collected: various types of Data as specified in the privacy policy of the service.

### Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.

The interaction and information obtained through this Application is subject to the User's privacy settings on each applicable social network.

This type of service may collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services to ensure that the processed data on this Application is not linked to the User's profile.

PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services facilitating interaction between the User and the PayPal platform provided by PayPal Inc.

Personal Data collected: Cookies; Usage Data.

Place of processing: See the PayPal privacy policy – Privacy Policy.

### 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 noting when the User clicked on links included in the message.

Mailchimp (The Rocket Science Group, LLC.)

Mailchimp is an email address management and message sending service provided by The Rocket Science Group, LLC.

Personal Data collected: email address.

Place of processing: US – <u>Privacy Policy</u>. Privacy Shield participant.

## Registration and authentication

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third party services, for registration or identification purposes.

Log In with PayPal (PayPal Inc.)

Log In with PayPal is a registration and authentication service provided by PayPal Inc. and is connected to the PayPal network.

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

Place of processing: See the PayPal privacy policy – Privacy Policy.

### 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.

### The rights of Users

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

In particular, Users have the right to do the following:

- 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 accomplished on a legal basis other than consent. Further details are provided below in the dedicated section of this privacy policy.
- Access their Data. Users have the right to learn whether the Owner is processing their Data, 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, under certain circumstances, 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, under certain circumstances, 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. If the Data is processed by automated means and the processing is based on the User's consent, then this provision is applicable to a contract of which the User is a part or to pre-contractual obligations thereof.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

### 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.

However, Users should be aware that, should their Personal Data be processed for direct marketing purposes, Users can object to such processing, at any time, without providing any justification. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant section(s) of this privacy policy.

### How to exercise these rights

Any requests to exercise User rights should be directed to the Owner through the contact details provided in this privacy policy.

These requests can be exercised free of charge and will be addressed by the Owner as soon as feasible, which period shall never exceed one month.

### **Cookie Policy**

This Application uses Cookies. Our cookie policy applies to the use of the Service and its terms are incorporated herein by reference and made a part hereof. To learn more, and for a detailed cookie notice, view our cookie policy <a href="here">here</a>.

# 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 the improper use of this Application or the related Services.

The User affirms awareness that the Owner may be required to reveal personal data upon request by 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 those purposes.

### Information not contained in this policy

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

### How "Do Not Track" requests are handled

This Application does not support "Do Not Track" requests. To determine whether any of the third-party services this Application uses honor the "Do Not Track" requests, please carefully review their privacy policies.

### Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page, by giving notice within this Application and/or—as far as technically and legally feasible—by sending a notice to Users via any contact information available to the Owner. It is strongly recommended to consult 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 utilized by the Users, the Uniform Resource Identifier addresses, the time of the request, the method utilized 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 utilized by the User, the various time details per visit (e.g., the time spent on each page within this Application) and the details about the path followed within this 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 and, where applicable, any third party whose Personal Data has been obtained, posted, published or shared using this Application.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

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.

Cookies

Consist of portions of code installed in the browser that assist the Owner in providing the Service according to the purposes described.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

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