

D.P.R. s.r.l.

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 Phone: +39-0362-542939

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 VAT: IT 02631370968

 e-mail: info@dpr-srl.it

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Barlassina, 25/05/18

# Privacy - Information pursuant to EU Regulation 2016/679 ("GDPR")

#### What types of data do we collect?

When you use our services, you accept that our company collects some of your personal data. This page is intended to tell you what data we collect, why and how we use it.

We treat two types of data:

- data provided by the user
- data that we collect automatically

### Data provided by the user

If you are a private person

If you are a private individual, when you register with our Reserved Area or if you want to send us a request for information, we ask you to provide us with some data that we need to use our service to the fullest.

These are the data we ask you:

Company, VAT number, address, ZIP code, city, state, telephone, email, telephone number, contact person.

You can also choose to provide us with the following information:

Fax, Message, if you're one of our retailer and how you met us.

On the website you can use the "Chat" function to communicate with our Customer Center. For more information, please read the "Chat" section.

- If you are a professional

If you are a private individual, when you register with our Reserved Area or if you want to send us a request for information, we ask you to provide us with some data that we need to use our service to the fullest.

These are the data we ask you:

Company, VAT number (VAT), address, ZIP code, city, state, telephone, email, telephone number, contact person.

You can also choose to provide us with the following information:

Fax, Message, if you're one of our retailer and how you met us.

On the website you can use the "Chat" function to communicate with our Customer Center. For more information, please read the "Chat" section.

#### Data that we automatically collect via chat

We collect the following data through the chat services:

technical data: eg IP address, browser type, information on your computer, data relative to your current position (approximate);

data collected using cookies or similar technologies: for more information, please visit the "Cookies" section.

# 1. How do we use the collected data?

We use the collected data to inform you about our commercial and marketing activities.

## 1.1. To guarantee access to our services and improve delivery

We use your information to guarantee you access to our services and their provision, including:

- access to the reserved area
- contact with the Customer Center also through the Chat feature
- activities of an administrative, financial or accounting nature, such as those relating to purchases of paid services and possible recovery of credit

These treatments are necessary to supply the services correctly to the users who join them.

These treatments are based on the legitimate interest of the Data Controller (see point 3.1) and you can object at any time.

# 1.2. To inform you about our business activities

We use the data collected, if you have expressly provided your consent, to inform you about promotional activities that may interest you. In particular we use them for:

- communicate promotional, commercial and advertising activities on events, initiatives or partnerships of the D.P.R., by e-mail;
- Carry out analysis and reporting activities related to promotional communication systems, such as the detection of the number of open emails, clicks
  made on links within the communication, the type of device used to read the communication and the relative operating system or the list of
  subscriptions to the newsletter.



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### 2. Is the provision of data mandatory?

The provision of personal data is mandatory only for the processing necessary for the provision of services offered by D.P.R. (any refusal to provide the service makes it impossible to use the service).

## 3. Who are the subjects of the treatment?

#### 3.1. Data controller

Data controller is D.P.R. Srl in person of its legal representative pro-tempore, with registered office located in BARLASSINA (IT), Via Parisi, 12, P.Iva IT02631370968 The data controller uses data controllers to achieve the purposes specified in point 1 and a Data Protection Officer (DPO) to monitor the protection of personal data

For each request related to your personal data, compare the following point 3.2.

#### 3.2. Data Protection Officer (DPO) and contact information

The person in charge of data protection (Data Protection Officer) pursuant to art. 37 of the GDPR is Panzeri Enrico.

We remind you that you can contact the DPO at any time and send any question or request regarding your personal data and respect your privacy by writing to <a href="mailto:info@dpr-srl.it">info@dpr-srl.it</a>

# 3.3. Subjects to whom personal data may be disclosed

The data collected as part of the provision of the service may be communicated to:

- bodies and administrative and judicial authorities by virtue of legal obligations

Under no circumstances do we transfer or sell personal data to third parties.

# 4. How can you get information on the data, modify it, delete it or have a copy?

### 4.1. Access to personal data from your private area and revocation of consent (opt-out)

You can, at any time, request your personal information by email at <a href="info@dpr-srl.it">info@dpr-srl.it</a>. Remember that you can cancel the consent you have at any time via email at <a href="info@dpr-srl.it">info@dpr-srl.it</a>.

# 4.2. Export and cancellation of the processing of personal data

To export your personal data (takeout) or request the cancellation you can send a request to the email address info@dpr-srl.it from the email box with which you registered.

Your personal data will be exported within 30 days or, in case the export becomes particularly complex, within three months.

The cancellation will be made within the foreseen technical times and in accordance with the retention period specified in the following point 5.

# 4.3. Exercise your rights

Any natural person who uses our service can:

- obtain from the owner, at any time, information about the existence of their personal data, the origin of the same, the purposes and methods of treatment and, if present, to obtain access to personal data and information referred to in Article 15 of the GDPR
- request the updating, rectification, integration, deletion, limitation of data processing if one of the conditions provided for in Article 18 of the GDPR occurs, the transformation into anonymous form or blocking of personal data, processed in violation by law, including those that do not need to be kept for the purposes for which the data were collected and / or subsequently processed
- oppose, in whole or in part, for legitimate reasons, to the processing of data, even if pertinent to the purpose of collection and processing of personal data provided for commercial information purposes or sending advertising material or direct selling or for the fulfillment of market research or commercial communication.

Each user also has the right to withdraw the consent at any time without prejudice to the lawfulness of the treatment based on the consent given before the revocation

receive personal data, provided knowingly and actively or through the use of the service, in a structured format, commonly used and readable by automatic device, and transmit them to another data controller without impediments

We remind you that for any question or request related to your personal data and to respect your privacy you can write to info@dpr-srl.it



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# 5. How and for how long will your data be stored?

The retention of personal data will take place in paper and / or electronic / IT format and for the time strictly necessary to fulfill the purposes referred to in point 1, in compliance with your privacy and current regulations.

In the case of active users, they will be kept for 36 months for security reasons in order to ensure a better quality of the same, also in collaboration with the Authorities.

For purposes of analysis directed to the development and improvement of the service, the personal data of the user may be subject to the same retention period. For direct marketing and profiling purposes we keep your data for a maximum period equal to that foreseen by the applicable legislation (respectively equal to 24 and 12 months)

Invoices, accounting documents and transaction data are stored for 11 years under the law (including tax obligations).

In the case of the exercise of the right to be forgotten through the request for explicit cancellation of personal data processed by the owner, we remind you that such data will be kept, in a protected form and with restricted access, only for purposes of ascertainment and repression of crimes. no more than 12 months from the date of the request and will subsequently be securely deleted or anonymized irreversibly.

Finally, we remind you that for the same purposes, the data relating to electronic traffic, excluding the contents of communications, will be kept for a period of no more than 6 years from the date of communication, pursuant to art. 24 of the Law n. 167/2017, which implemented the EU Directive 2017/541 on anti-terrorism.

# 6. How do we ensure the protection of your data?

The data are collected by the subjects indicated in point 3, according to the indications of the relevant legislation, with particular regard to the security measures provided by the GDPR (Article 32) for their processing by means of computerized, manual and automated tools and with strictly related logic to the purposes indicated in point 1 and in any case so as to guarantee the security and confidentiality of the data.

In compliance with the applicable regulations, a system of anti-spam verification on communications is active. The data entered may be verified for the sole purpose of identifying illegal activities or contents that do not comply with the General Conditions of the Service, but will not be processed or communicated for commercial or promotional purposes.

#### 7. Further information

### 7.1. Chat

The Chat function is aimed at an immediate communication between:

Users who contact the Customer Center of D.P.R. for assistance and customer care related to the service

We may verify the content of the Messages in order to moderate them for security purposes and to preserve the netiquette and editorial rules.

# 7.3. Position

When you use the D.P.R. applications and chat services with the detection of the active position, we may collect and process information about your current position (approximate). This data is processed anonymously, in a format that does not allow the user to be personally identified and used for the sole purpose of facilitating the use of some position-based service features. You can activate / deactivate location services at any time by accessing the settings of your browser and / or your device.

### 8. Is the privacy policy subject to change over time?

This information may be subject to change. If substantial changes are made to the use of data on the user by the Owner, the latter will notify the user by publishing them with the maximum evidence on their pages or through alternative or similar means.