## Privacy policy of www.ecolibri.it

Data controller

Donatella Scarpa-Viale delle Industrie 25, 20864 Agrate Brianza, Italy- "Ecolibri" SRL (LLC)-

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Contact details: Office: +39-39-6056714 Email Address of the Owner: info@ecolibri.it

This document has been drawn up pursuant to art. 13 of EU Regulation 2016/679 (hereinafter: Regulation") in order to allow you to know our privacy policy, to understand how your personal information is managed when you use our site and, where appropriate, to give your consent to the processing of your personal data expressed and aware. The information and data provided by you or otherwise acquired as part of the use of the services available through the site will be processed in compliance with the provisions of the regulation and the confidentiality obligations that inspire the activity of the Owner.

According to the rules of the Regulation, the processing carried out by the Data Controller will be based on the principles of lawfulness, correctness, transparency, purpose limitation and retention, data minimization, accuracy, integrity and confidentiality.

## Types of data collected

Among the personal data collected by this Application, independently or through third parties, there are: Cookies, Usage Data, name, surname, email, various types of data and communication data during the use of the service.

Full details of each type of data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the collection of the data. Personal data may be freely provided by the user or, in the case of usage data, collected automatically during the use of this Application.

Unless otherwise specified, all data required by this Application are mandatory. If the User refuses to communicate, it may be impossible for this Application to provide the Service. In cases where this Application indicates some Data as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or on its operation.

Users who have doubts about which data are mandatory, are encouraged to contact the Owner.

Any use of Cookies - or other tracking tools - by this Application or by the owners of third-party services used by this Application, unless otherwise specified, has the purpose of providing the Service requested by the User, in addition to the additional purposes described in this document and in the Cookie Policy, if available.

The User assumes the responsibility of the Personal Data of third parties obtained, published or shared through this Application and guarantees to have the right to communicate or disseminate them, freeing the Owner from any liability to third parties.

# How and where the data collected is processed Mode of treatment

The Data Controller shall take appropriate security measures to prevent unauthorised access, disclosure, modification or destruction of Personal Data.

The processing is carried out using computer and/ or telematic tools, with organizational methods and logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other subjects involved in the organization of this Application (administrative,

commercial, marketing, legal, system administrators) or external subjects (such as third party technical service providers, postal couriers) may have access to the Data, hosting providers, IT companies, communication agencies) also appointed, if necessary, as Data Processors by the Data Controller. The updated list of Data Processors may always be requested from the Data Controller.

## Legal basis of the processing

The Data Controller processes personal data relating to the user if one of the following conditions exists:

- The User has given consent for one or more specific purposes; Note: in some jurisdictions the Owner may be authorized to process Personal Data without the consent of the User or another of the legal bases specified below, until the User opposes ("opt-out") such processing. However, this is not applicable if the processing of Personal Data is governed by European legislation on the protection of Personal Data;
- the processing is necessary for the execution of a contract with the User and/or the execution of pre-contractual measures;
- the processing is necessary to fulfil a legal obligation to which the Data Controller is subject;
- processing is necessary for the performance of a task in the public interest or for the exercise of official authority vested in the Owner;
- the processing is necessary for the pursuit of the legitimate interest of the Owner or third parties.

It is always possible to ask the Data Controller to clarify the concrete legal basis of each processing and in particular to specify whether the processing is based on the law, provided by a contract necessary to conclude a contract.

#### Place

1.Data are processed at the operational headquarters of the Data Controller and in any other place where the parties involved in the processing are located. For more information, contact the Owner.

The User's Personal Data may be transferred to a country other than the one in which the User is located. To obtain further information on the place of processing, the User can refer to the section relating to the details of the processing of Personal Data.

The User has the right to obtain information about the legal basis of the transfer of Data outside the European Union or to an international organization of public international law or consisting of two or more countries, such as the UN, as well as the security measures taken by the Data Controller to protect the Data.

If one of the above transfers takes place, the User can refer to the respective sections of this document or request information from the Data Controller by contacting the Data Controller at the opening.

#### Storage period

The Data are processed and stored for the time required by the purposes for which they were collected.

Therefore:

• The Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of this contract is completed.

• The Personal Data collected for purposes attributable to the legitimate interest of the Data Controller will be retained until such interest is satisfied. The User can obtain further information about the legitimate interest pursued by the Data Controller in the relevant sections of this document or by contacting the Data Controller.

When the processing is based on the User's consent, the Data Controller may retain the Personal Data for longer until such consent is revoked. In addition, the Data Controller may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period personal data will be deleted. Therefore, upon expiry of this term, the right of access, cancellation, rectification and the right to portability of the Data can no longer be exercised.

## Purpose of the processing of the data collected

The User's Data is collected to allow the Owner to provide its Services, as well as for the following purposes: Access to accounts on third-party services, Contact the User, SPAM protection, Displaying content from external platforms, Hosting and backend infrastructure and Backup saving and management.

To obtain further detailed information on the purposes of the processing and Personal Data concretely relevant for each purpose, the User can refer to the relevant sections of this document.

#### **Details on the processing of Personal Data**

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

#### • SPAM protection

This type of services analyzes the traffic of this Application, potentially containing Data Personal Users, in order to filter it from parts of traffic, messages and content recognized as SPAM.

#### Google reCAPTCHA (Google Inc.)

Google reCAPTCHA is a SPAM protection service provided by Google Inc. Use of the reCAPTCHA system is subject to Google's privacy policy and terms of use.

Personal data collected: Cookies and Usage Data.

Place of processing: United States-Privacy Policy. Subject adhering to the Privacy Shield.

#### **Contact the User**

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

The User, by filling in the contact form with his / her data, consents to their use for respond to requests for Information, quotes, or any other indicated nature from the form header.

Personal data collected: name, surname, email.

#### **Contact by phone (this Application)**

Users who have provided their phone number may be contacted by email commercial or promotional related to this Application, as well as to meet support requests.

Personal data collected: phone number.

#### • Hosting and backend infrastructure

This type of service has the function of hosting data and files that allow this application to work, allow its distribution and provide a ready infrastructure

to be used to deliver specific features of this Application.

Some of these services work through servers located geographically in different places, making it difficult to determine the exact place where Personal Data is stored.

#### Hosting Aruba (Aruba S. P. A.)

Hosting Aruba is a hosting service provided by Aruba S. p. A.

Personal data collected: various types of data as specified by the privacy policy of the service.

Place of processing: Italy-Privacy Policy.

#### • Viewing content from external platforms:

\* This type of services allows you to view content hosted on external platforms directly from the pages of this Application and interact with them. In the event that a service of this type is installed, it is possible that, even if the Users do not use the service, I myself collect traffic data relating to

#### YouTube Video Widget (Google Inc.)

YouTube and a video content viewing service operated by Google Inc. that allows this Application to integrate such content within its pages.

Personal data collected: Cookies and Usage Data.

Place of processing: United States-Privacy Policy. Subject adhering to the Privacy Shield.

#### Google Maps Widget (Google Inc.)

Google Maps is a map visualization service provided by Google Inc. that allows this Application to integrate such content within its pages.

Personal Data collected: Cookies and usage data.

Place of processing: United States-Privacy Policy. Subject adhering to the Privacy Shield. **Google Fonts (Google Inc.)** 

Google Fonts is a typeface visualization service provided by Google Inc. that allows this Application to integrate such content within its pages.

Personal Data collected: usage data and various types of Data as specified by dalia privacy policy of the service.

Place of processing: United States-Privacy Policy. Subject adhering to the Privacy Shield.

## User rights

Users can exercise certain rights with reference to the data processed by the Data Controller.

In particular, the User has the right to:

- withdraw consent at any time. The User can revoke consent to the processing of their Personal Data previously expressed.
- object to the processing of your Data. The User may object to the processing of their data when it takes place on a legal basis other than consent. Further details on the right of objection are indicated in the section below.
- access your Data. The User has the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the Data processed.
- verify and request rectification. The User can verify the correctness of their Data and request updating or correction.
- obtain the restriction of processing. When certain conditions apply, the User can request the limitation of the processing of their Data. In this case the Data Controller will not process the data for any other purpose than their storage.
- obtain the deletion or removal of their Personal Data. When certain conditions are met, the User can request the deletion of their Data by the Owner.isEpj
- receive your Data or have it transferred to another Data Controller. The User has the right to receive their Data in a structured, commonly used and machine-readable format and, where technically feasible, to obtain its transfer without hindrance to another holder. This provision is applicable when the Data is processed with automated tools and the processing is based on the User's consent, on a contract of which the User is a party or on contractual measures related to it.
- File a complaint. The User can lodge a complaint with the competent personal data protection authority or act in court.

## **Details of the right of objection**

When the Personal Data are processed in the public interest, in the exercise of public powers vested in the Data Controller or to pursue a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons related to their particular situation.

We would like to point out that Users who, if their Data were treated for direct marketing purposes, may object to the processing without providing any reason. To find out if the Owner traits Data with direct marketing purposes Users can refer to the respective sections of this document.

#### How to exercise your rights

To exercise the rights of the User, Users can address a request to the Owner's contact details indicated in this document. Requests are filed free of charge and processed by the Owner as soon as possible, in any case within one month.

## **Cookie Policy**

This Application makes use of Cookies. To learn more and to read the detailed information, the User can consult the Cookie Policy.

#### **Further information on treatment**

#### Legal defence

The User's Personal Data may be used by the Owner in court or in the run-up to its possible establishment for the defense against abuse in the use of this Application or related Services by the User.

The User declares to be aware that the Owner may be obliged to reveal the Data by order of the public authorities.

## **Specific information**

At the request of the User, in addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

#### **System Log and maintenance**

For needs related to operation and maintenance, this application and any third-party services used by it may collect system logs, ie files that record interactions and that may also contain Personal Data, such as the IP address User.

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

Further information in relation to the processing of Personal Data may be requested at any time to the Data Controller using the contact details.

## Reply to "do not Track" requests"

This Application does not support "Do not Track" requests.

To find out if any third-party services used support them, the User is invited to consult the respective privacy policy.

#### Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by giving information to Users on this page and, if possible, on this Application as well as, where technically and legally feasible, by sending a notification to Users through one of the contact details in the possession of the Owner. Please therefore consult this page regularly, referring to the date of last modification indicated at the bottom.

If the changes affect processing whose legal basis and consent, the Owner will collect the User's consent again, if necessary.

#### **Definitions and legal references**

#### **Personal Data (or Data)**

It constitutes Personal Data any information that, directly or indirectly, even in liaison with any other information, including a personal identification number, makes a natural person identified or identifiable.

#### **Usage Data**

This is information collected automatically through this Application (including from third-party applications integrated into this Application), including: IP addresses or domain names of the computers used by the User who connects with this Application, addresses in URI notation (Uniform Resource Identifier), the time of the request, the method used to forward the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the servers (successful, error, etc.) country of origin, the characteristics of the browser and the operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details relating to the itinerary followed within the Application, with particular reference to the sequence the pages consulted, the parameters related to the operating system and the computer environment of the User.

## User

The individual who uses this Application, which, unless otherwise specified, coincides with the interest.

#### Concerned

The natural person to whom the Personal Data refers.

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

The natural person, legal entity, public administration and any other entity that processes personal data on behalf of the Data Controller, as set out in this privacy policy.

#### **Data controller (or data controller)**

The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of the processing of personal data and the instruments adopted, including security measures relating to the operation and use of this Application. The Data Controller, unless otherwise specified, and the owner of this Application.

#### This Application

The hardware or software tool by which the User's Personal Data are collected and processed. **Service** 

II Service provided by this Application as defined in the relevant terms (if present) on this site/application.

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

Unless otherwise specified, any reference to the European Union contained in this document shall be understood as extending to all current member states of the European Union and the European Economic Area.

#### Cookies

Small portion of data stored inside the User's device.

## Legal references

This privacy statement is prepared on the basis of multiple legislative systems, including Art. 13 and 14 of Regulation (EU) 2016/679. Unless otherwise specified, this privacy policy applies only to this Application.