

Doc I-01-web

Trevidea Srl Privacy Notice

Your privacy and the protection of your personal data are really important for us, for this reason we collect and keep your personal data using the maximum attention and we safely store them. Below you will find the main information on the treatment of our personal data in relation to your browsing on the site and the use of the services offered. For detailed information on how we handle your personal data, please read our entire Privacy Notice.

Data controller

TREVIDEA S.r.l.

Strada Consolare Rimini-San Marino 62
47924 Rimini (RN) Italy

Address email of the holder: privacy@trevidea.it

Types of Data collected and Purpose

The Personal Data collected by this Website, directly or via the User, independently or through third parties, are:

<p>Purposes and legal bases on the basis of which we process the data:</p> <ul style="list-style-type: none">- To fulfill a contractual and pre-contractual or post-contractual obligation (eg Guarantees)- Legitimate Interest of the Owner (Customers)- The user has given consent for one or more purposes- Comply with legal obligations regarding administrative / accounting and tax provisions- Defend yourself in Judgment <p>Other purposes:</p> <ul style="list-style-type: none">- Meet the User's requests on products and services,- Make orders and purchases online,- Provide direct assistance or through authorized centers- Send advertising, informative and newsletter material- Contact the user directly by email, text message, telephone or by direct visit of our sales representatives.- Analysis and statistics of data to better direct commercial communications, techniques and	<p>Examples of data types that we can handle:</p> <p><i>Name, Surname, Mail, Company Name and Legal Form, City, REA, Bank Data, Shipping Data, VAT, Tax Code, Country, City, Address, ZIP Code, State / Region, Province, Phone, Mobile, Codes Promotional, Access Authentication Data, and other types of data</i></p>
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<p><i>marketing based on specific interests or geographical location.</i></p> <ul style="list-style-type: none"> - <i>We also process personal data to prevent and ascertain fraud and abuse in order to protect the safety of our customers, companies of the TREVI group and others. We could also use credit ratings to assess and manage credit risks.</i> - <i>Interaction with data collection platforms and other third parties</i> 	
<p>DATA SHARING OF SOCIAL NETWORKS Purposes and legal bases</p> <ul style="list-style-type: none"> - <i>The user gave his consent for one or more purposes</i> <p>Other purposes:</p> <ul style="list-style-type: none"> - <i>Sharing web page contents on the social networks of the user with marketing and p.r. agents.</i> - <i>Marketing activities on social networks.</i> 	<p>If the user decides to share some contents on the social networks (Facebook, Instagram, YouTube ...etc) the web page might have the access to some details of the user's account or profil whether the user has accepted the data sharing of his account or profile with applications of third parties.</p>
<p>LOCALIZATION DATA Purposes and legal bases</p> <ul style="list-style-type: none"> - <i>To fulfill a contractual and pre-contractual obligation</i> - <i>Legitimate Interest of the Owner</i> <p>Other purposes:</p> <ul style="list-style-type: none"> - <i>Request direct assistance or through authorized centers</i> - <i>Address the user to Point of Sale or direct and indirect Commercial staff</i> - <i>Invitations to events in the user's area</i> - <i>Marketing and direct contact</i> 	<p><i>The data relating to geolocation are used for the identification of the sales points and / or of the Commercial and / or Authorized Assistance Centers close to the user's location and also for the display and invitations to events related to the location of the site. 'user.</i></p>
<p>WEB SITE functioning The treatment of the data is authorized by the legit interest</p>	<p>Navigation data of the user, as IP address, browser and appliance data etc are kept for all the navigation time on the web site. When these terms pass, personal data will be destroyed, deleted or changed in anonymous data (if they have not been collected anonymously before).</p>
<p>STATISTICS</p> <p>All the services included in this section allow the Holder to monitor and analyze traffic data and to record the User's attitude. The treatment of the data is authorized by the legit interest</p>	<p>Service used</p> <p>Google Analytics provided by Google Inc. ("Google") permits to analyze web data. Google uses collected Personal Data to track and analyze the usage of this Web Page, to fill reports and share them with other services powered by Google. Google might use Personal Data to contextualize and personalize the adds of its promotional network. Collected Personal Data: Cookies and usage data. Place of treatment: USA – Privacy Policy – Opt Out.</p>
<p>Protection from SPAM</p> <p>The treatment of the data is authorized by the legit interest</p>	<p>This kind of services analyzes the traffic of this web page that might contain Users' Personal</p>

	Data in order to filter it from parts of Traffic Data, messages and SPAM contents.
OBLIGATORY of DATA CONFERENCE	Some personal data are strictly necessary for the management of the order, others are used only for the purpose of obtaining anonymous statistical information on use and to check its correct functioning and are deleted immediately after processing. Others are necessary to fulfill the contractual obligations to provide the requested service.

Mode and place of processing of collected data

Method of treatment and communication

The Data Controller takes appropriate **security measures** to prevent unauthorized access, disclosure, modification or destruction of Personal Data. The processing can be carried out both by computer and / or telematic and analogical tools, with organizational methods and with logic strictly related to the purposes indicated.

It is important that the User takes appropriate measures to deny the non-authorized access to password and his computers, devices and applications. The User has always to make sure to log out when he finishes using a shared computer.

In addition to the Data Controller, in certain cases, other subjects involved in the **Data Controller's organization** may have access to Data (administrative, commercial, marketing, legal, system administrators) or **external subjects** (such as third parties technical service providers, mail carriers, hosting providers, IT companies, communication agencies, Authorized Technical Assistance Centers, Sales and Brokerage Agencies, Credit Insurance Companies, Insurance Companies, Financial Institutions, affiliated company of TREVIDEA Holder) also appointed, if necessary, **Data Processors Holder**.

In no case will the data held by the Data Controller be **disseminated** and / or **disclosed to third parties** not specified in this list for purposes of direct marketing, except with the explicit consent of the Data Subject.

The updated list of Data Managers can always be requested directly from the Data Controller.

Place

The 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 that in which the User is located such as our Foreign Dealers. To obtain further information on the

processing site, the User can refer to the section concerning the processing of Personal Data.

In case of higher protection, the User has the right to get information about the legal base of Data treatment out from European Union or from an international organization of international public rights or from one made of two or more countries, for example UN, even about safety measures taken by the Holder.

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

Data retention

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

Therefore:

- Personal Data collected for purposes related to the execution of a contract or pre-contract between the Owner and the User / Customer / Supplier will be retained until the execution of the contract is completed, to comply with administrative and accounting practices and tax and for the terms established by law.
- Personal Data collected for purposes related to the legitimate Interest of the Data Controller will be retained until such interest is met. The User can obtain further information regarding the legitimate interest pursued by the Owner in the relevant sections of this document or by contacting the Data Controller.
- When the treatment is based on the consent of the User, the Data Controller may retain the Personal Data until such consent is revoked. Furthermore, the Data Controller may be obliged to keep Personal Data for a period other than the revocation date in compliance with a legal obligation or by order of an authority

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

Data transfer outside the EU

The Data Controller may transfer Personal Data collected within the EU to third countries (ie, all countries not belonging to the EU) only in accordance with a specific legal basis. Therefore, such data transfers are performed according to one of the legal bases described below.

The User can request information from the Owner regarding the applicable legal basis applicable to each individual service.

Transfer of Data from the EU and / or Switzerland to the United States based on the Privacy Shield (this Website)

When this is the legal basis, the transfer of Personal Data from the EU or Switzerland to the United States is based on the EU - US or Switzerland - US Privacy Shield Agreement.

In particular, Personal Data are transferred to subjects that have been auto certified in the Privacy Shield Agreement and which therefore ensure a high level of Data protection. Services interested by Data transfer are listed in the specific sections of this document. Between them, the subjects that take part in Privacy Shield can be found checking the concerning privacy policy or verifying the status of their subscription in the official list of the Privacy Shield. The users' rights according to the Privacy Shield are described in updated way on the web site of the Trade Department of the USA. Data transfer from EU or Switzerland to the States to subjects not (more) subscribed in the Privacy Shield is allowed only according a valid legal base. Users can ask for information to the Owner about these legal bases.

Transfer of Data to countries that guarantee European standards (this Website)

When this is the legal basis, the transfer of Personal Data from the EU to third countries takes place according to an adequacy decision adopted by the European Commission. The European Commission takes decisions about adequacy referring to single third countries that are considered able to keep a level of Personal Data protection similar to the one planned by European laws about Personal Data protection. The User can check the list of decisions about adequacy on the internet site of the European Commission.

User's rights (*User of the site, Customer, Provider*)

Users may exercise certain rights with reference to the Data processed by the Data Controller. In case of superior protection, the User can exercise all the rights listed below. In any other case, the User can contact the owner to find out what rights are applicable in his case and how to exercise them.

In particular, the User has the right to:

- **Revocate at any time.** The User can revoke his agreement to Personal Data treatment allowed before.
- **To reject the Personal Data treatment.** The User can reject Personal Data treatment when it takes place on a legal base different from the one of the agreement. Further details about right of opposition are described in the following paragraph.
- **To access to his own Data.** The User has the right to get information about Data processed by the Owner about particular aspects of the treatment and the User has the right to get a copy of the processed Data.
- **To check and ask for a rectification.** The user can check whether his Data are correct and ask for an update or correction.
- **To get the limitation to the treatment.** When certain conditions take place, the User can ask for the limitation of the treatment of his Data. In this case the Owner doesn't process the Data for no other aim different from collection.

- **To cancel or remove Personal Data.** When certain conditions take place, the User can ask for the cancellation of his Data.
- **To receive Personal Data or to transfer them to another holder.** The User has the right to receive his own Data in a structured format of common use and well readable from an automatic device and, if possible, to get the transfer of them to another holder. This disposition can be asked when Data are processed by automatic means and the treatment is based on the User's agreement, on a contract of which the User is part or on contractual measures linked to it.
- **To complain.** The User can complain to the authorities for the Personal Data security or take a legal action.

Details on the right of opposition

Users are reminded that, if their data are processed for direct **marketing purposes**, they can oppose the processing without providing any reasons. To find out if the Owner deals with data for direct marketing purposes, Users can refer to the respective sections of this document.

How to exercise the rights

To exercise the rights of the User, Users can direct a request to the contact details of the Owner indicated in this document. Requests are filed for free and processed by the Data Controller as soon as possible, in any case within one month of notification.

Cookie Policy

This Web Site uses Cookies. For further information and to check the detailed document, the User can check the [cookie policy](#).

More information on treatment

Defense in court

User's Personal Data might be used by the Owner in court or during the preliminary steps to his eventual preparation to the defense from abuses in the use of this Web Site or of the Services linked by the User. The User declares to know that the Owner might be forced to reveal the Data by public authority.

Specific policy

Requested by the User, in addition to the information of the privacy policy, this Web Site might give to the User extra information about specific services or about the collection of Personal Data.

System Log and service

For reasons linked to the work and service, this Web Site and all the eventually third services used by this Site, they might collect system logs i.e. files that report the interactions and that might contain Personal Data, as User's IP.

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.

Answer to “Do Not Track” request

This Web Site doesn't supply “Do Not Track” requests i.e. the requests that ask for the interruption of the data collection.

To know whether the eventual services of the third parties supply them, the User can check the relative privacy policy.

Changes to this privacy policy

The Owner of the Treatment has the right to modify this privacy policy in any moment informing the Users by this page and, if possible, by the Web Site and, if possible from a technical and legal point of view, by sending a notification to the Users using one of the contacts held by the Owner. Therefore, the Users is kindly asked to regularly check this page referring to the date of the last change written at the end.

If the changes deal with the treatments that has the consent as legal base, the Owner will collect once again the User's consent, if required.

Legal references

Personal Data (or Data)

Personal Data are all information that, directly or not, identifies a physical person even by connection to any other information, identification number included.

Processing Data

They are the information automatically collected by this Web Site (even by third parties included in this Web Site) like: IP addresses or domain names of computers used by the User that connects to this Web Site, URI addresses (Uniform Resource Identifier), time of the request, way to forward the request to the server, the dimension of the file got back, the code showing the answer of the server, the country of origin, characteristics of the browser and the system used by the User, the duration of the visit, the details linked to the path of the Application, especially to the series of the searched pages, to the system and to the informatics space of the User.

The User

Who uses this Web Site or gives in any other way his data to the Owner (for example, client, supplier or partner), is the Interested, unless otherwise stated.

The Interested

The physical person to whom Data refer.

The Responsible of the Treatment (or Responsible)

The physical or legal person, the public administration and any other entity who deals with personal data for the Owner, according to this privacy policy.

The Owner of the Treatment (or Owner)

The physical or legal person, the public authority, the service or any other entity who, alone or with others, decides the means and the purposes of the personal data treatment and the way, safety measures linked to the use of the Web Site included. The Owner of the Treatment, unless otherwise stated, is the owner of the Web Site.

This Web Site (or this Application)

The hardware or software tool used to collect and process the Users' Personal Data.

Service

The Service provided by this Web Site as shown in the relative terms (if present) on this site/application.

European Union (or EU)

Unless otherwise stated, any reference to the European Union in this document refers to actual states members of the EU and EEA.

Cookies

Small part of data collected in the User's device.

Company part of TREVI Group

TREVI SPA - Str. Consolare Rimini San Marino, 62
47924 - Rimini ITALY P.Iva 01527080400

Legal references

This privacy statement is drawn up on the basis of multiple legislative systems including the Regulation (EU) 2016/679, the Legislative Decree 196/2003 and the Legislative Decree 101/2018, with particular reference to art. 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy statement applies exclusively to this Website.

Last updated: May 2018