



PRIVACY POLICY NOVE 25 S.R.L.

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1. DATA CONTROLLER

The data controller is.

- **NOVE25 s.r.l. Registered office: Via Raffaello Sanzio 19/21 - 20149 Milan Head office: Via Raffaello Sanzio 19/21 - 20149 - Milan C.F./P.IVA: 04217070962 - REA Number:**
- **PEC info@pec.nove25.net or to**

NOVE25 S.r.l., as the Data Controller, protects the personal data, provided by you during the navigation and use of this site by ensuring their confidentiality and guaranteeing compliance with the regulations in force as well as the necessary level of protection, from any occurrence that may put them at risk of violation.

As required by Article 13 of the General Data Protection Regulation of the European Union (GDPR), NOVE25 informs you that personal data, collected through this website, are processed by means of computer and/or telematic tools, for the purposes indicated below in this statement.

2. PURPOSE, LEGAL BASIS OF PROCESSING RETENTION TERMS AND TYPES OF DATA PROCESSED

A) Regarding the processing carried out by the website:

Scope and Purpose of Processing:

Pursuant to Article 6 EU Regulation No.679/2016 (and subsequent legislative adaptation provisions Legislative Decree 101/2018) (GDPR) for the following Service Purposes:

(a) interaction and navigation on the site:

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- 1) To enable the enjoyment and use of this website, as well as to carry out maintenance and technical support necessary for its proper functioning;
- 2) To allow the Owner to respond to requests made by you through this website.

Legal basis for processing and nature of data provision:

The legal basis underlying the processing referred to in (a) of this point is provided for in Art. 6 par.1(f) GDPR, which states that "processing is necessary for the purposes of pursuing the legitimate interests of the data controller or a third party".

The Processing of Personal Data will be legally based on the contractual relationship that will be created between the data subject and the Data Controller as a result of your interaction with the company's specific website;

Types of data processed:

With regard to the data processed by this website, the owner processes:

The computer systems and software procedures used to operate this website acquire, in the course of their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

Accordingly, the following personal data, by way of example, may be processed:

Navigation data:

This category of data includes IP addresses or domain names of the computers and terminals used by users, addresses in URI/URL (Uniform Resource Identifier/Locator) notation, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. These data, necessary for the use of web services, are also processed for the purpose of:

- obtain statistical information on the use of services (most visited pages, number of visitors by time slot or daily, geographical areas of origin, etc.);
- check the proper functioning of the services offered.
- data communicated by the user: such as, for example, personal data provided by you through the "contact" form or data given in the "Create an account and join Club Nove25" section.

In particular, it is specified that the data processed by means of the website are:

Derived data

Information that our servers automatically collect when you access the Site, such as your IP address, browser type, operating system, access times, and pages viewed directly before and after accessing the Site.

Financial data and data collected during payment transactions aimed at purchasing products

Financial information, such as payment method information (e.g., valid credit card number, card brand, expiration date) that we may collect when you make purchases, orders, returns, exchanges, or request information about our services from the Site. We store only very little, if any, of the financial information we collect. Otherwise, all financial information is stored by our payment processor, Amazon Payments, Google Checkout, Paypal, Salesforce, Klarna, Luigi'sbox, Cartstack and Google Cloud Enterprise server and you should review their privacy policy and contact them directly for answers to your questions.

In order to have a clearer understanding of the data protection guarantees carried out by the payment systems used by Nove 25 S.r.l., the links of the privacy policies of the payment platforms mentioned above are indicated below:

<https://www.amazon.com/gp/help/customer/display.html%3FnodeId%3DGX7NJQ4ZB8MHFRNJ>

<https://cloud.google.com/privacy/>

<https://www.paypal.com/myaccount/privacy/privacyhub>

<https://www.salesforce.com/company/privacy/>

Facebook Permissions

The Site may, by default, access basic Facebook account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other information you have chosen to make public. The site may also request access to other account-related permissions, such as friends, check-ins, and likes, and you can choose to grant or deny us access to each individual permission. For more information about Facebook permissions, please see the Facebook Permissions reference page. For your convenience and our transparency we provide below the link to review Facebook's privacy policy:

https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0

Data from social networks

User information may be collected from social networking sites, such as Facebook, Google+, Instagram, Pinterest, and Twitter, including name, social network user name, location, gender, date of birth, e-mail address, profile photo, and public contact information, if the user links his or her account to such social networks.

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**Mobile device data**

Device information such as mobile device ID, model and manufacturer, and device location information may be collected if you access the Site from a mobile device.

Third-party data

Information from third parties, such as personal information or network friends, may be collected if you link **your** account to the third party and grant the Site permission to access this information. Data from contests, giveaways and surveys. Personal and other information that may be provided when you enter contests or giveaways and/or respond to surveys.

Data retention periods

Time depending on the retention terms of each cookie

B) Regarding the activity of the data controller.**Toward customers:**

a)

Purpose: contract

The Data Controller, in order to allow the purchase of its products and/or services, as well as to follow up on your requests needs to collect some Personal Data, as requested within the subscription or purchase form

Legal basis and nature of contribution

Execution of pre-contractual and contractual measures taken at the request of the data subject and/or execution of a contract to which the data subject is a party (Art. 6(1)(b) GDPR). In case of refusal to provide personal data, it will not be possible for the Controller to provide the service

Type of data

Identifying and contact data: first name, last name, e-mail address, telephone number, Tax code, City, Country of residence, other data that may be provided by the customer.

Data retention periods:

Throughout the duration of the contractual relationship and for 10 years from the conclusion of the relationship

b)

Purpose: Legal Obligations

Record invoices, receive payments;

- Fulfilling pre-contractual, contractual and tax obligations arising from the customer relationship;
- Fulfilling obligations under the law, a regulation, EU legislation or an order of the Authority

Legal basis and nature of conferral:

Legal obligation to which the owner is bound (Art. 6(1)(c) GDPR).

The provision of data is mandatory, and in case of refusal to provide personal data, it will not be possible for the Holder to provide the service

Data type:

- Identification and contact information:
- First name, last name, e-mail address, phone number, Social Security number, City, Country of residence

Data retention periods:

Throughout the duration of the contractual relationship and for 10 years from the conclusion of the relationship

c)

Purpose: Defense in court

Exercise the Holder's rights, such as any right of defense in court.

Legal basis and nature of conferral:

Legitimate interest of the data controller (Art. 6(1)(f) GDPR): right of defense fairly balanced with the same right of the data subjects identification and contact data:

Data type:

First name, last name, e-mail address, phone number, social security number, city, country of residence, and other data necessary for litigation

Data retention periods:

For the duration of the contractual relationship and for 10 years from the conclusion of the relationship.

d)

Purposes: marketing, newsletter sending activities, commercial communications

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The performance by the Data Controller of its own promotional and/or marketing activities against. This category includes all activities performed to promote products, services, sold and/or provided by the Data Controller; subject to specific consent.

Legal basis and lawfulness of processing:

Legitimate Interest under Article 6(f) of the Regulations - The Processing of Personal Data will be conducted by the Data Controller and will be legally based on its legitimate interest in promoting its products and services;

Legal basis and lawfulness of processing:

Consent of the Data Subject ex art. 6 letter a) of the Regulations - The Processing of Personal Data will be conducted by the Data Controller and will be legally based on **free, express and unequivocal consent**.

Data types:

Identifying and contact information: first name, last name, e-mail address, phone number, social security number, city, country of residence,

Data retention periods:

24 months after collection

e) _____

Purpose: Product customization:

Subject to your specific, written, unequivocal and unconditional consent, receive data provided by you, including particulars in order to customize a product or service requested by the user customization of the product requested by the user within the scope of negotiations.

Legal basis and nature of conferral

Execution of pre-contractual and contractual measures taken at the request of the data subject and/or execution of a contract to which the data subject is a party (Art. 6(1)(b) GDPR). In case of refusal to provide personal data, it will not be possible for the Data Controller to provide the contractual and pre-contractual performance

Data types:

any data provided by the customer including that of finger measurements provided for the purpose of product customization and personalization.

Data retention periods:

Throughout the duration of the contractual relationship and for 10 years from the conclusion of the relationship

f) _____

Active behavioral profiling:

It consists of profiling users based on their actions and behaviors, such as opening or clicking on certain content. This type of profiling is based on analyzing the actions performed by users to send them targeted advertisements in line with their interests and habits.

Passive behavioral profiling:

It refers to the profiling of users without direct action on their part, but through the analysis of their online behaviors, such as browsing websites or using online services. **This type of profiling is often used in digital marketing to personalize offers and advertisements.**

Legal basis and lawfulness of processing: legitimate interest ex art. 6 letter f) of the Regulation - The Processing of Personal Data will be conducted by the Data Controller and will be legally based on the legitimate interest of the Data Controller to promote its products and services and receive requests from the data subject;

Legal basis and lawfulness of processing: consent of the data subject ex art. 6 letter a) of the Regulation - The Processing of Personal Data will be conducted by the Data Controller and will be legally based on **free, express and unequivocal consent**.

Types of data processed

contact data, data related to personal likes and dislikes, ip, geolocation and other data provided by the data subject.

Data retention periods:

24 months after collection

With regard to suppliers:

g) _____

Purpose contract:

- carry out the proper execution of contracts and supply services and, in particular;;
- for contractual/pre-contractual relationship management with the company, financial and business relationship management;
- for the management of personal data of the legal representative of the supplier
- legal person and the execution of pre-contractual activities
- to conduct the preliminary assessment of services proposed by potential providers;

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-for entry into master records in company computer databases;

Legal basis and nature of contribution

Execution of pre-contractual measures taken at the request of the data subject and/or execution of a contract to which the data subject is a party (Art. 6(1)(b) GDPR).

In case of refusal to provide personal data, it will not be possible for the Holder to provide the service.

Type of data

Identification and contact information:

First name, last name, e-mail address, phone number, Social Security number, City

Data retention period

Throughout the duration of the contractual relationship and for 10 years from the conclusion of the relationship

h)

Legal obligations

- Recording invoices, receiving payments;
- Fulfilling pre-contractual, contractual and tax obligations arising from the customer relationship;
- Fulfill obligations under the law, a regulation, EU legislation or an order of the Authority

Legal basis and nature of contribution

-Legal obligation to which the owner is bound (Art. 6(1)(c) GDPR).

In case of refusal to provide personal data, it will not be possible for the Holder to provide the service.

Type of data

Identifying and contact information: first name, last name, place and date of birth, e-mail address, phone number

Data retention period

Throughout the duration of the contractual relationship and for 10 years from the conclusion of the relationship

j)

Purpose: Defense in court

Exercise the Holder's rights, such as any right of defense in court.

Legal basis and nature of conferral:

Legitimate interest of the data controller (Art. 6(1)(f) GDPR): right of defense fairly balanced with the same right of the data subjects identification and contact data:

Data type:

First name, last name, e-mail address, phone number, social security number, city, country of residence, and other data necessary for litigation

Data retention periods:

For the duration of the contractual relationship and for 10 years from the conclusion of the relationship.

With respect to employees/collaborators

k)

The processing of personal data, including special data within the meaning and effect of Article 9 of the GDPR, including those of third parties, provided when entering into the contract of employment is carried out in accordance with the contract itself and/or the collective bargaining agreement for the sector, as well as in compliance with legal obligations.

The refusal to provide all or some of the requested data and/or the provision of partial and/or untrue data by the data subjects prevents the Data Controller from fulfilling its legal and contractual obligations, in particular the obligations of a welfare, social security nature, including in relation to the application for family allowances. In particular, the purposes are:

to fulfill obligations under the employment contract (e.g., to verify the exact performance, to commensurate the amount of pay, including overtime, or bonuses to be paid, to ascertain the existence of a legitimate cause for absence, to apply for family allowances, to quantify vacation and leave);

purposes provided for in the sector's collective bargaining agreement (e.g., to take advantage of union leave or expectations);

purposes stipulated by law: for communications and proxies to social security and welfare agencies, both public and private;

to fulfill accounting obligations (e.g., legally required entries and records) imposed on the employer;

Perform security auditing activities of the Owner's IT systems to prevent unauthorized access or unauthorized communication and to protect the Owner's corporate assets;

Fulfill obligations under the law, a regulation, EU legislation or an order of the Authority;

Exercise the rights of the Owner, such as any right of defense in court.

Legal basis and nature of conferral:

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The **legal basis** that legitimizes the processing of data for the above purposes is the performance of a contract to which the data subject is a party (Art. 6 para. 1(b) GDPR), the fulfillment of legal obligations by the Data Controller (Art. 6 para. 1(c) GDPR) and the legitimate interest of the Data Controller (Art. 6 para. 1(f) GDPR) that is fairly balanced with the rights and freedoms of the data subjects.

The processing of special data revealing the health status of the data subject is necessary to fulfill the obligations and exercise the specific rights of the data owner or the data subject in the field of labor and safety law (Art. 9, no. 2 lett. b of the GDPR), as well as for occupational medicine purposes (Art. 9, no. 2 lett. h of the GDPR).

The provision of personal data is mandatory, as it is required for the fulfillment of legal and contractual obligations.

Failure to provide personal data will make it impossible for the Owner to establish and/or continue a working relationship or collaboration with the person concerned.

Data retention terms:

10 years after termination of employment

In respect of the candidates

l)

Purpose: Personnel selection

Purposes related to the execution of pre-contractual negotiations:

Managing the process of selecting and evaluating candidates for inclusion in the corporate organization, including evaluating individuals to fill positions sought;

The Data Controller may process special data ex art. 9 GDPR such as but not limited to: health status, membership in protected categories, disability, or union membership, etc. The legal basis legitimizing the processing of data for the

purposes specified above is the execution of pre-contractual negotiations requested by the data subject is party (art. 6 no. 1 letter b) of the GDPR). In connection with the evaluation of the application, the Data Controller may also process special personal data pursuant to Art. 9 GDPR, such as, but not limited to, those revealing state of health or religious beliefs or trade union membership.

Legal basis and nature of contribution

The legal basis legitimizing the processing in this case is the specific and informed free consent of the data subjects (Art. 6 No. 1 letter a) of the GDPR). In case consent is not given, it will not be possible to evaluate the application.

Data subjects have the right to revoke their consent at any time, but processing carried out before revocation remains lawful. After revocation, the data controller will cease processing the data for which consent is required (Art. 7 No. 3 GDPR).

Type of data

Curriculum vitae and the data contained therein: Contact data (such as, e.g., address, e-mail address, telephone number, etc.); Data on education, professional experience, and previous activities; special categories of personal data (such as, e.g., health status, union membership, etc.) only to the extent that such information is contained on the cv, Photo as it is on the cv

Data retention period

12 months after collection, unless employment relationship is established with the data subject

m)

Legal obligation

Fulfilling obligations under the law with regard to possible subsequent employment.

Legal basis and nature of contribution

The legal basis legitimizing the processing of data for the purposes specified above is the fulfillment of legal obligations (Art. 6 No. 1 letter c) of the GDPR).

Type of data

Contact data (such as, for example, address, e-mail address, telephone number, etc.); data on education, professional experience, and previous activities;

Data retention period

12 months after collection, unless employment relationship is established with the data subject

o)

Litigation defense

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Protecting the rights of the owner and exercising the right of defense in case of litigation

Legal basis and nature of contribution

The legal basis legitimizing the processing of data for the purposes specified above is the legitimate interest of the Data Controller (Art. 6 No. 1 letter f) of the GDPR), which in this case is fairly balanced with the rights and freedoms of the data subjects. Contact data (such as, for example, address, e-mail address, telephone number, etc.);

Type of data

Data on education, professional experience and previous activities; and data necessary for defense in court.

Data retention period

12 months after collection, unless employment relationship is established with the data subject.

Policy for children

We do not knowingly solicit information from children under the age of 13 nor do we market to them. If you become aware of any data we have collected from children under the age of 13, please contact us using the contact information provided below.

3. PROCESSING METHODS AND HOW DATA ARE COLLECTED

The processing of personal data is carried out by means of the following operations: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction of data.

The processing will be carried out either by manual and/or computerized and telematic means with logics of organization and processing strictly related to the purposes themselves and in any case in such a way as to guarantee the security, integrity and confidentiality of the data themselves in compliance with the organizational, physical and logical measures provided for in Articles 24 and 25 and 32 of the GDPR.

The personal data subject to processing are collected directly by the Data Controller or by third parties expressly authorized by the Data Controller, or communicated by the Data Controller to such third parties for the pursuit of the purposes set forth in this policy.

The Data Controller carries out periodic checks so that no personal data are processed, collected, stored or retained that are not necessary in relation to the processing and related purposes as outlined in this policy.

Processing resulting from profiling: The owner performs automated data processing for the purpose of passive and active behavioral profiling, which may include:

Online activity monitoring: This technique involves tracking users' online activities, such as browsing websites, interactions with content, clicks on advertisements, and purchase behaviors. This data is used to understand users' preferences and habits

Analysis of browsing data: Through the analysis of users' browsing data, behavior patterns, search preferences, and actions taken online can be detected. This information is crucial for creating detailed behavioral profiles

Use of cookies and trackers: Cookies and other tracking tools are used to collect information about user behavior online. These tools allow us to record users' actions and personalize the experience based on their interests

Analysis of demographic data: In addition to behavioral data, user demographics, such as age, gender, geographic location, are also considered to enrich behavioral profiles and offer personalized content.

Data collection: Data is collected on user behavior, such as actions taken online, interactions with content, clicks on advertisements, and more

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4. ACCESS TO DATA BY PROCESSING EMPLOYEES

Data may be made accessible for the exclusive purposes set forth in this policy:

- to employees and collaborators of the Controller, the auxiliaries and third persons employed companies and companies in supply and outsourcing relationship with the Controller in their capacity as authorized persons for processing and/or internal data controllers and/or system administrators;
- to third-party companies or other entities performing outsourced activities on behalf of the Controller, in their capacity as external data controllers.

5. COMMUNICATION OF PERSONAL DATA

Personal Data may be disclosed to specific entities considered to be recipients of such Personal Data, which should be understood as natural or legal persons, public authority, service or another body receiving communication of Personal Data, whether or not they are third parties.

With this in mind, in order to properly carry out all Processing activities necessary to pursue the purposes set forth in this Notice, the following Recipients may be in a position to process Personal Data:

Third parties who carry out part of the Processing activities and/or activities related and instrumental to the same on behalf of the Data Controller. These individuals have been appointed as data controllers, i.e., natural or legal persons, the public authority, service or other body that processes Personal Data on behalf of the Data Controller; individuals, employees and/or collaborators of the Data Controller, who have been entrusted with specific and/or more Personal Data Processing activities. Such individuals have been given specific instructions regarding the security and proper use of Personal Data and are defined as the "*persons authorized to process Personal Data under the direct authority of the Data Controller or Data Processor.*"

Where it is required by law or to prevent or suppress the commission of a crime, Personal Data may be disclosed to public bodies or judicial authorities without, however, being defined as Recipients. In fact, the Regulation stipulates that public authorities receiving disclosure of Personal Data as part of a specific investigation conducted in accordance with Union or Member State law are not considered Recipients.

Without the need for express consent, the Data Controller may communicate the data for the above purposes to Supervisory Bodies, Judicial Authorities, insurance companies for the provision of insurance services, as well as to those subjects to whom the communication is compulsory by law for the fulfillment of the said purposes.

Specifically, data recipients may be:

- information and computer support companies;
- Companies, or professional firms offering professional and/or consulting services with respect to accounting, legal, tax, administrative, financial, and debt collection matters;
- Providers of IT infrastructure and solutions;
- Web service providers;
- Banks and payment service providers, acting as Data Processors, to whom personal data may be disclosed for payment processing purposes;
- consultants, to the extent necessary for the performance of their professional duties.

The communication concerns the categories of personal data whose transmission to the above-mentioned third parties is necessary for the performance of the activities and for the purposes referred to in this notice.

An up-to-date list of the Data Processors and the persons authorized to process the data is kept at the Data Controller's office and is available upon request to be made by e-mail to the address in point 1 of this policy.

Some of these parties may process data in their capacity as autonomous data controllers.

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The data will not be disseminated.

Data communications may also relate to:

Law or exercise of rights

If the release of information is deemed necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property and safety of others, we may share information as permitted or required by any applicable law, rule or regulation. This includes sharing information with other entities for fraud protection and credit risk reduction.

Third-party service providers

The site shares information with third parties who perform services for the site or on our behalf, including data analysis, emailing, hosting services, customer service, and marketing support.

Other third parties

We may share information with advertisers and investors for the purpose of conducting general business analysis. We may also share information with such third parties for the purposes of marketing, passive active profiling, payment systems, and interaction tools.

In particular, Nove 25 S.r.l. makes use of the services of the following platforms:

CartStack

CartStack is a cart abandonment email management service that helps e-commerce businesses recover lost sales. The service offers features for tracking user data, sending cart abandonment emails, and managing marketing campaigns. To ensure compliance with the General Data Protection Regulation (GDPR), CartStack requires the acquisition of explicit consent from users to process their personal data. The link to CartStack's privacy policy is <https://www.cartstack.com/privacy-policy/>.

Klarna

Klarna is a payment institution that collects and processes customers' personal data responsibly and with respect for their privacy. Klarna's privacy policy describes how the company collects and uses personal data when you use payment services, contact customer service, and access Klarna's web portal and mobile app. The notice also explains users' rights regarding the processing of personal data and how to exercise them. Klarna may collect various types of personal data, either directly or through third parties, depending on the service used. These include:

- Identifying and contact information (name, date of birth, social security number, address, email, phone number, etc.).
- Information about the goods and/or services purchased
- Financial information (income, loans, negative payment reports, etc.).
- Data on interaction with Klarna (service usage, preferences, customer service interactions, etc.).
- Recordings of telephone calls with assistance
- Information about user interaction with stores

Klarna retains only the information strictly necessary to provide services in a secure and reliable manner. Users have the right to request a copy of their personal information processed by Klarna. The full link to Klarna's privacy policy is: <https://www.klarna.com/it/privacy/>

Only for Nove 25 S.r.l. stores is the Flora system used:

Flora S.r.l. uses users' personal data with respect for their privacy and in compliance with the General Data Protection Regulation (GDPR). Flora's privacy policy explains how the company collects and processes personal data when you use its services. Flora may collect various types of personal data, either directly or through third parties, depending on the service you use. These include:

- Identifying and contact information (name, email, phone number, etc.).
- Device and web browsing information (IP address, browser type, pages visited, etc.).

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- Contents of chats with other users
- Financial information for transactions

Flora retains only the information strictly necessary to provide services in a secure and reliable manner. Users have the right to request a copy of their personal information processed by Flora, update it, or delete it. Users can manage their privacy preferences in various ways, such as.

: Disable push notifications from your device

- Enable/disable location services
- Set your browser to reject or flag cookies

The full link to Flora's privacy policy is: <https://flora.bio/it/content/59-privacy-policy>

Luigi's Box

Ways of using information

Luigi's Box uses the information collected to provide the services. Information may be processed and transferred within and to countries and territories where the company operates or where there are authorized third parties that may have different privacy laws.

Information sharing and dissemination

Luigi's Box does not share personal information about you or any content with third parties, except as authorized by this Privacy Policy or in connection with Luigi's Box services. Information may be shared with third parties working on behalf of Luigi's Box, integrated third parties or third party products you choose, or when necessary to protect the safety of users or required by law or legal process.

More information

Users can manage their privacy preferences by setting cookies and browser settings. Luigi's Box does not sell or give away users' personal information to third parties. The full link to Luigi's Box's privacy policy is: <https://www.luigisbox.it/privacy-policy/>.

Marketing communications

Only with your explicit and unconditional consent, and an opportunity to withdraw consent, may we share information with third parties for marketing purposes as permitted by law.

Third-party advertisers

We may use third-party advertising companies to serve ads when you visit the Site.

These companies may use information about visits to the Site and other Web sites that is contained in Web cookies in order to provide advertisements about goods and services of interest.

Affiliates

We may share your information with our affiliates, in which case we will require those affiliates to comply with this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or are under common control with us. Our affiliated companies are: Nove 25 Roma S.r.l., Dipa S.r.l and 4See S.r.l. ("le Lenutier")

Business partners

We may share information with our business partners to offer certain products, services or promotions.

Social media contacts

If you connect to the Site through a social network, contacts on the social network will see your name, profile photo, and business description.

Cookies and web beacons

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We may use cookies, web beacons, tracking pixels and other tracking technologies on the Site to help personalize the Site and improve your experience. When you access the Site your personal information is not collected through the use of tracking technologies. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action may affect the availability and functionality of the Site. Users cannot reject web beacons. However, they can be made ineffective by rejecting all cookies or by changing your web browser settings to notify you each time a cookie is offered, allowing you to accept or reject cookies on an individual basis. We may use cookies, web beacons, tracking pixels and other tracking technologies on the Site to help personalize the Site to improve your experience. For more information about how we use cookies, please refer to our Cookie Policy posted on the Site, which is incorporated into this Privacy Policy. By using the Site, you agree to be bound by our Cookie Policy.

Cookies are small text files that are saved on the user's device when visiting a website. There are different types of cookies, including:

- First-party cookies: belong to the website owner and collect user data accessible only to the owner
- Third-party cookies: belong to third parties and are used to collect information about user activity on multiple websites
- Technical cookies: necessary for the operation of the website
- Profiling cookies: used to track user activity and create a profile based on interests

Active user consent is required for most cookies.

The cookies used by www.Nove25.net are as follows:

Internet advertising

In addition, we may use third-party software to serve ads on the Site, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technologies to help manage and optimize your online user experience with us. For more information about opting out of interest-based ads, visit the Network Advertising Initiative opt-out tool or the Digital Advertising Alliance opt-out tool.

Web site analysis

We may also partner with selected third-party vendors such as Google Analytics to enable the use of tracking technologies and remarketing services on the Site through the use of first-party and third-party cookies to, among other things, analyze and track users' use of the Site, determine the popularity of certain content, and better understand online activity. By accessing the Site, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly to get answers to your questions. We do not transfer personal information to these third-party vendors. However, if you do not want your information collected and used by tracking technologies, you can visit the third-party vendor or the Network Advertising Initiative Opt-Out Tool or Digital Advertising Alliance Opt-Out Tool. You should be aware that purchasing a new computer, installing a new browser, updating an existing browser, or deleting or changing browser cookie files may also delete some cookies, plug-ins, or opt-out settings.

6.DATA STORAGE AND TRANSFER

Personal data are stored mainly with both paper and digital procedures in Italy, within the European Union and precisely also outside the Holder's Head Office and in full compliance with the provisions and fulfillments necessary for the purposes of security and proper location of the data storage units. Digital storage modes are limited only to the sending of documentation and are carried out in full compliance with the provisions and fulfillments necessary for the purposes of security and proper location of data storage units(pc and secure back up tools) as well as for the purposes of security of paper archives.

The Controller will process personal data for as long as necessary to fulfill the above purposes and in any case for no longer than the termination of the relationship carried out for the Service Purposes.

The data retention periods are shown in the tables above

Retention time related to data processing carried out by this website:

Personal data will be processed and stored for as long as necessary for the purposes for which it was collected.

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Therefore:

Personal Data collected for purposes related to the performance of a contract between the Data Controller and the User will be retained until the full performance of that contract.

Personal Data collected for purposes of legitimate interest of the Data Controller will be retained for as long as necessary to fulfill those purposes. Users can find specific information about the legitimate interests pursued by the Controller in the relevant sections of this document or by contacting the Controller.

The Controller may be authorized to retain Personal Data for a longer period if the User has given consent to such processing, provided that such consent is not withdrawn. In addition, the Controller may be obliged to retain Personal Data for a longer period if this is required for the fulfillment of a legal obligation or by order of an authority.

Once the retention period has expired, the Personal Data will be deleted. Therefore, the right of access, the right to erasure, the right to rectification, and the right to data portability cannot be exercised after the retention period has expired.

7.EXTRA EU/SEAS TRANSFER

In the management of the relationship with customers, there is no transfer of data to third countries nor to international organizations.

Should it become necessary to make transfers of personal data outside the territory of the European Union to countries not considered adequate by the European Commission, the Controller will ensure that appropriate or adequate safeguards are in place to protect personal data and that the transfer of such data complies with applicable data protection laws.

Any transfer of data subjects' data to countries located outside the European Union will, in any case, take place in compliance with the appropriate and adequate safeguards for the purposes of the transfer itself, in accordance with the applicable legislation and in particular Articles 45 and 46 of the Regulations.

Accordingly, where required by applicable data protection laws, the Owner will ensure that service providers sign Standard Contractual Clauses approved by the European Commission.

8.RIGHTS OF THE DATA SUBJECT

In your capacity as a user you are entitled to the following rights:

-Right to access the data, obtain confirmation of the existence or non-existence of personal data concerning you, even if not yet registered, and their communication in an intelligible form; -obtain indication of: (a) the origin of the personal data; (b) the purposes and methods of processing; (c) the logic applied in the case of processing carried out with the aid of electronic instruments; (d) the identification details of the data controller, data processors and the data controller's representative and the persons authorized to process the data; and (e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of the data in their capacity as designated representative in the territory of the State, data processors or persons authorized to process the data; (Art. 15 GDPR).

-Right to update, rectify or, when interested, supplement data; (Art. 16 GDPR).

-Right to erasure, transformation into anonymous form or blocking of data processed in violation of the law, including data whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed ; (art. 17 GDPR).

-Right to request the restriction of use of data for the sole reasons of public interest and for the establishment or defense of a right, in cases where the data subject disputes the accuracy of the data and processing, in the case of exercising the right to object to processing under Article **21 GDPR**, and in the other cases provided for in Article 18 GDPR; (Article 18 GDPR).

-Right to receive the personal data provided to the data controller in a structural format or on a commonly used, intelligible and accessible computer medium for any operating system (USB or duly encrypted ZIP file), and to move without constraints, the complexes of information and data concerning you from the present controller to another controller

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chosen by you in accordance with the purposes and in full compliance with the principles of transparency, lawfulness and proportionality of processing. This **right to data portability is without prejudice to other rights**; (Art. 20 GDPR).

-Right to **object**, in whole or in part:

a) for legitimate reasons to the processing of personal data concerning you, even if relevant to the purpose of collection; b) to the processing of personal data concerning you for any other purpose not relevant to the processing; (Art. 21 GDPR).

-**Right** to withdraw consent, where provided and at any time. Revocation of consent does not affect the lawfulness of the processing based on the consent given before revocation;

-Right to file a complaint with the supervisory authority.

Additional rights of the data subject:

- **Right to object and restrict processing carried out by profiling under Article 22 GDPR.**

-**Limitations to the obligations of data controllers and data processors under Article 23 GDPR**

The obligations on the Data Controller and the Data Processor to make this disclosure pursuant to Art. 12 GDPR, not to submit to an automated procedure pursuant to Art.22 GDPR, and to make the disclosures pursuant to Art. 34 GDPR may be waived only upon *consent or by necessity of disclosure to the Supervisory Authorities for reasons of national security, public safety, defense in court, for the prevention, detection and prosecution of crimes, for the protection of the interests and freedoms of others, for the independence of the judiciary, for the execution of civil actions, and for relevant objectives of public and economic interest.*

9.HOW TO EXERCISE RIGHTS

You may at any time exercise your rights by sending a request by email to the address [in point 1 of this notice](#) and you may also exercise your rights by contacting the Privacy Guarantor, with Headquarters in Piazza Venezia n. 11 - 00187 Rome, Telephone switchboard: (+39) 06.696771, Fax: (+39) 06.69677.3785. For general information you can send an e-mail to: protocollo@gpdp.it, protocollo@pec.gpdp.it

10. OBJECTION TO PROCESSING AND WITHDRAWAL OF CONSENT

As provided for in the Regulations, if you have given your consent to the Processing of your Personal Data for one or more of the purposes for which you have been requested, you may, at any time, revoke it in whole and/or in part without affecting the lawfulness of the Processing based on the consent given before revocation.

The procedures for revoking consent are very simple and intuitive, simply contact the Data Controller and/or the Co-Processor companies using the contact channels provided within this Policy.

In addition to the above and for the sake of simplicity, should you find yourself in the condition of receiving advertising e-mail messages from the Co-Processor companies that are no longer of interest to you, simply click on the text "**IF YOU NO LONGER WISH TO RECEIVE OUR NEWSLETTERS YOU CAN CAN CAN CANCEL BY CLICKING HERE.**"

placed at the bottom of the same to stop receiving any further communication or, if not present, using the additional contact channels made available by the Data Controller or the Joint Data Controller companies.

-**Right** to withdraw consent, where provided and at any time. Revocation of consent does not affect the lawfulness of the processing based on the consent given before revocation;

-**Right to file a complaint with the supervisory authority.**

11.PROCEDURE FOR REVOCATION OF CONSENTS ON PROCESSING OF ENTITY DATA:

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Dear User, You may request revocation of one or more of the privacy consents listed below by sending an email to the address **Section 1** of this Data Protection Notice and stating one or more of the options you wish to revoke.

- Revocation of Email Communications

- Revocation of third-party marketing communications by email

Once the request is received, it will generally be processed within **48 hours**.

HOW TO DISABLE COOKIES OF ANY BROWSERS USED BY THE USER FOR BROWSING BY BROWSER CONFIGURATION?

Chrome

1. Running the Chrome Browser
2. Click on the menu on the browser toolbar next to the url entry window for browsing
3. Select Settings
4. Click Show Advanced Settings
5. In the "Privacy" section, click "Content Settings" button.
6. In the "Cookies" section, you can change the following cookie-related settings: - Allow local data to be saved locally - Change local data only until the browser is closed - Prevent sites from setting cookies - Block third-party cookies and site data - Manage exceptions for certain websites - Delete any or all cookies

For more information visit the [dedicated page](#).

Mozilla Firefox

1. Run the Mozilla Firefox Browser
2. Click on the menu on the browser toolbar next to the url entry window for browsing
3. Select Options
4. Select the Privacy panel
5. Click Show Advanced Settings
6. In the "Privacy" section, click "Content Settings" button.
7. In the "Tracking" section, you can change the following cookie-related settings: - Require sites not to do any tracking - Notify sites of your willingness to be tracked - Notify no preference regarding tracking of personal data
8. From the "History" section you can: - Enable "Use custom settings" by selecting to accept third-party cookies (always, from the most visited sites or never) and to keep them for a specified period (until they expire, when Firefox closes, or to ask each time) - Remove individual stored cookies.

For more information visit the [dedicated page](#).

Internet Explorer/Edge

1. Run the Internet Explorer/Edge Browser.
2. Click on the Tools button and choose Internet Options
3. Click on the Privacy tab and in the Settings section change the slider to the of the desired action for cookies:
 - Block all cookies
 - Allow all cookies
 - Selection of sites from which to obtain cookies: move the slider to an intermediate position so as not to block or allow all cookies, then press on Sites, in the Website Address box enter a website and then press on **Block or Allow**

For more information visit the [dedicated page](#).

Safari 6

1. Running the Safari Browser
2. Click on Safari, select Preferences and press on Privacy
3. In the *Block Cookies* section, specify how Safari should accept cookies from Internet sites.
4. To view which sites have stored icookie click on Details

For more information visit the [dedicated page](#).

Safari iOS (mobile devices)

1. Running the Safari iOS Browser
2. Tap on Settings and then Safari
3. Tap on Block Cookies and choose from the options, "Never," "Third Party and Advertisers," or "Always"
4. To clear all cookies stored by Safari, tap on Settings, then on Safari and finally on Clear Cookies and Data

For more information visit the [dedicated page](#).

Opera

1. Running the Opera Browser

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2. Click on Preferences then Advanced and finally Cookie
 3. Select one of the following options: - Accept all cookies - Accept cookies only from the site you are visiting: third-party cookies and that are sent from a domain other than the one you are visiting will be rejected - Never accept cookies: all cookies will never be saved
- For more information visit the dedicated page.

12. DEFINITIONS AND LEGAL REFERENCES

Personal Data (or Data)

Personal data is any information that, directly or indirectly, including in connection with any other information, including a personal identification number, makes a natural person identified or identifiable.

Usage Data

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

User

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

Interested

The natural person to whom the Personal Data refers.

Data Processor (or Manager)

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

Data Controller (or Owner)

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

This Application

The hardware or software tool by which Users' Personal Data are collected and processed.

Service

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

European Union (or EU)

Unless otherwise specified, any reference to the European Union in this document is understood to extend to all current member states of the European Union and the European Economic Area.

Cookie

Cookies are Tracking Tools that consist of small portions of data stored within the User's browser.

Tracking Tool

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Tracking Tool means any technology - e.g., cookies, unique identifiers, web beacons, embedded scripts, e-tags, and fingerprinting - that allows tracking Users, for example, by collecting or storing information on the User's device.

Legal references

This privacy policy is prepared based on multiple legislative orders, including Articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy policy covers this Application only.

13. ACCEPTABLE USE POLICY FOR WEBSITE USERS

Prohibited use

You may not use the Services to post content or engage in activities that are illegal under applicable law, harmful to others, or that could expose us to liability, including but not limited to the following activities, each of which is prohibited by this AUP:

- Phishing or identity theft;
- Distribution of computer viruses, worms, Trojan horses (TROJAN) or other malicious codes (MALWARE, RANSOMWARE, etc.);
- Distribute pornography or adult content or offer escort services;
- Promoting or facilitating violence or terrorist activities;
- Infringement of intellectual property or other property rights of others.

Application

Your services may be suspended or terminated with or without notice if you violate this policy. Any violation may result in immediate suspension or termination of your account.

Reporting violations

To report a violation of this policy, contact us as per **Section 9** of this policy

We reserve the right to change this policy at any time, and you will be promptly updated of this. To make sure you are up-to-date on the latest changes, we recommend that you visit this page often.

14. DATA DELETION PROCEDURE

Request for Deletion of Personal Data

Users have the right to request deletion of their personal data in accordance with Article 17 of the European Regulation 2016/679 (GDPR). To exercise this right, users can send a written request to the email address in Section 1 of this policy or **use the form available on our website**.

The request must contain the following information:

- **First and last name**
- **Email address used for registration**
- **A clear description of the cancellation request**

We undertake to respond to all cancellation requests without undue delay and, in any case, within **one month** of receipt of the request. If we need additional information to verify your identity, we reserve the right to **extend the response period by up to two months, informing you of the reason for the delay**. Please note that there may be some

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circumstances in which we cannot proceed with data deletion, such as if the data is needed to fulfill legal obligations or for archival purposes. In such cases, we will inform you of the reasons why we cannot proceed with the request.

[***Clik here to request the form***](#)

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