



NOVE25

PRIVACY POLICY NOVE 25 S.R.L.

NOVE25 S.r.l. with registered office in Via R. Sanzio, 19 - 20149 Milano (MI), as Data Controller, protects your personal data, given by you during the navigation and use of this website 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 your personal data, collected through this website, are subject to processing through computer and/or telematic tools, for the purposes indicated below in this statement.

1.PURPOSE OF PROCESSING**Purpose, legal basis for processing and data processed****With regard to the processing carried out by the website**

scope	Purpose of processing	Legal basis for processing and nature of data provision	Types of data processed	Data retention periods
a Website	<p><i>Regarding the processing purposes of the data controller's site.</i></p> <p>Pursuant to Article 6 EU Regulation No. 679/2016 (and subsequent legislative adaptation provisions Legislative Decree 101/2018) (GDPR) for the following Service Purposes:</p> <p>(a) interaction and navigation on the site:</p> <p>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;</p> <p>2) To allow the Owner to respond to requests made by you through this website.</p>	<p>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".</p> <p>The Processing of your Personal Data will be legally based on the contractual relationship that will be created between you and the Data Controller as a result of your interaction with the company's specific website;</p>	<p>With regard to the data processed by this website, the owner processes:</p> <p>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. Consequently, the following personal data, by way of example, may be processed:</p> <p>-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 operating system and the user's computer environment. These data, necessary for the use of web services, are also processed for the purpose of:</p> <p>-obtain statistical information on the use of services (most visited pages, number of visitors by time slot or daily, geographical areas of origin, etc.);</p> <p>-check the proper functioning of the services offered.</p> <p>- 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.</p> <p>In particular, it is specified that the data processed by means of the website are:</p> <p>Derived data</p> <p>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.</p> <p>Financial data and data collected during payment transactions aimed at purchasing products</p>	Time depending on the retention terms of each cookie

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			<p>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.</p> <p>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:</p> <p>https://www.amazon.com/gp/help/customer/display.html%3FnodeId%3DGX7NJQ4ZB8MHFRNJ</p> <p>https://cloud.google.com/privacy/</p> <p>https://www.paypal.com/myaccount/privacy/privacyhub</p> <p>https://www.salesforce.com/company/privacy/</p> <p>Facebook Permissions</p> <p>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:</p> <p>https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0</p> <p>Data from social networks</p> <p>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.</p> <p>Mobile device data</p> <p>Device information such as mobile device ID, model and manufacturer, and device location information may</p>	
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			<p>be collected if you access the Site from a mobile device.</p> <p>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.</p> <p>Third-party data the site does not send data to third parties.</p> <p>In terms of the company's main activity, the owner deals with: personal, identifying data hereinafter, "personal data" provided by the user by means of interaction with this site aimed at using the services of the Company.</p> <p>Regarding applications pertaining to personnel selection, the data processed and the related processing methods are as follows: Contact information (such as, address, e-mail address, phone number, etc.); Data on education, professional experience and previous activities; Special categories of personal data (such as, for example, health status, union membership, etc.) only to the extent that such information is contained in the cv Photo as it is on the cv Processing is carried out in both manual and computerized ways and with the support of paper, computer (management software, accounting, etc.) or otherwise automated and telematic means.</p> <p>In any case, the processing of data is carried out with the adoption of all appropriate measures to ensure the security and confidentiality of personal data, in particular in compliance with the security measures referred to in Article 32 of European Regulation No. 2016/679 and in accordance with the principles of lawfulness, necessity and proportionality.</p>	
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Regarding the activity of the data controller

With respect to customers

		Purpose	Legal basis and nature of contribution	Type of data	Data retention periods
a	contract	The Data Controller, in order to enable the purchase of its products and/or services, as well as to follow up on your requests needs to collect some of your Personal Data, as requested within the subscription or purchase form	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	identification and contact information: First name, last name, e-mail address, telephone number, Tax code, City, Country of residence, other data that may be provided by the customer.	Throughout the duration of the contractual relationship and for 10 ani from the conclusion of the relationship

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			for the Controller to provide the service		
b	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 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	Identification and contact information: First name, last name, e-mail address, phone number, Social Security number, City, Country of residence	Throughout the duration of the contractual relationship and for 10 ani from the conclusion of the relationship
c	Litigation defense	- Exercise the rights of the Owner, such as any right of defense in court.	-Legitimate interest of the data controller (Art. 6(1)(f) GDPR): right of defense fairly balanced with the same right of data subjects	Identification and contact information: First name, last name, e-mail address, telephone number, social security number, city, country of residence, and other data necessary for litigation	Throughout the duration of the contractual relationship and for 10 ani from the conclusion of the relationship
d	marketing	Activities of sending newsletters, commercial communications and marketing: the performance by the Data Controller of its own promotional and/or marketing activities towards you. This category includes all activities performed to promote products, services, sold and/or provided by the Data Controller; subject to your specific consent.	Legal basis and lawfulness of processing: legitimate interest under Article 6 letter f) of the Regulation - The Processing of your 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 Regulation - The Processing of your Personal Data will be conducted by the Data Controller and will be legally based on your free, express and unequivocal consent.	Identification and contact information: first name, last name, e-mail address, phone number, social security number, city, country of residence,	24 months after collection
e	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	Product customization requested by the user in the amnito of negotiations. 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, par. 1, lett. b) GDPR).In case of refusal to provide personal data, it will not be possible for the Data Controller to deliver the contractual and pre-contractual performance	Any data provided by the customer including finger measurements provided for the purpose of product customization and personalization	Throughout the duration of the contractual relationship and for 10 ani from the conclusion of the relationship
f	profiling	Active behavioral profiling: 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: Refers to the	Legal basis and lawfulness of processing: legitimate interest under Article 6 letter f) of the Regulation - The Processing of your Personal Data will be conducted by the Data Controller and will be legally based on its legitimate interest in promoting its products and services and receiving requests from the data subject;	Contact data, data on personal likes and dislikes, ip, geolocation and other data provided by the data subject	24 months after collection

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	<p>profiling of users without direct action on their part, but through 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.</p>	<p>Legal basis and lawfulness of processing: consent of the data subject ex art. 6 letter a) of the Regulation - The Processing of your Personal Data will be conducted by the Data Controller and will be legally based on your free, express and unequivocal consent.</p>	
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With respect to suppliers

		Purpose	Legal basis and nature of contribution	Type of data	data retention period
a	contract	<ul style="list-style-type: none"> -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; -for entry into master records in company computer databases; 	<ul style="list-style-type: none"> - 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. 	Identification and contact information: First name, last name, e-mail address, phone number, Social Security number, City	Throughout the duration of the contractual relationship and for 10 ani from the conclusion of the relationship
b	Legal obligations	<ul style="list-style-type: none"> - 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 	<ul style="list-style-type: none"> -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. 	Identification and contact information: First name, last name, place and date of birth, e-mail address, phone number	Throughout the duration of the contractual relationship and for 10 ani from the conclusion of the relationship
c	Litigation defense	<ul style="list-style-type: none"> - Exercise the rights of the Owner, such as any right of defense in court. 	<ul style="list-style-type: none"> --Legitimate interest of the data controller (Art. 6(1)(f) GDPR): right of defense fairly balanced with the same right of data subjects. In case of refusal to provide personal data, it will not be possible for the Holder to provide the service. 	Identification and contact information: First name, last name, place and date of birth, e-mail address, telephone number, and data necessary for defense in court	Throughout the duration of the contractual relationship and for 10 ani from the conclusion of the relationship

With respect to employees/collaborators

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 stipulated 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;

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

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 periods are 10 years from the end of the employment relationship

With respect to the candidates

		Purpose	Legal basis and nature of contribution	Type of data	data retention period
a)	Personnel selection	<p>- <u>purposes related to the execution of pre-contractual negotiations:</u> Managing the process of selecting and evaluating candidates for inclusion in the corporate organization, including evaluating individuals to fill positions sought;</p> <p>- The 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.</p>	<p>The <u>legal basis</u> 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) GDPR). In connection with the evaluation of the application, the Data Controller may also process special personal data under Article 9 GDPR, such as, but not limited to, those revealing health status or religious beliefs or trade union membership.</p> <p>The <u>legal basis</u> 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.</p> <p>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).</p>	<p>Curriculum vitae and the data contained therein:</p> <p>Contact information (such as, address, e-mail address, phone number, etc.);</p> <p>Data on education, professional experience and previous activities;</p> <p>Special categories of personal data (such as, for example, health status, union membership, etc.) only to the extent that such information is contained in the cv</p> <p>Photo as it is on the cv</p> <p>Processing is carried out in both manual and computerized ways and with the support of paper, computer (management software, accounting, etc.) or otherwise automated and telematic means.</p> <p>In any case, the processing of data is carried out with the adoption of all appropriate measures to ensure the security and confidentiality of personal data, in particular in compliance with the security measures referred to in Article 32 of the European Regulation No. 2016/679 and in accordance with the principles of lawfulness, necessity and proportionality.</p>	12 months after collection, unless employment relationship is established with the data subject
b)	Legal obligation	<p>- Fulfilling obligations under the law, with reference to possible subsequent employment.</p>	<p>The <u>legal basis</u> 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).</p>	<p>Contact information (such as, address, e-mail address, phone number, etc.);</p> <p>- Data on education, professional experience and previous activities;</p>	12 months after collection, unless employment relationship is established with the data subject
c)	Litigation defense	<p>- Protection of the rights of the owner and exercise of the right of defense in case of litigation</p>	<p>The <u>legal basis</u> 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.</p>	<p>Contact information (such as, address, e-mail address, phone number, etc.);</p> <p>Data on education, professional experience, and previous activities; and data necessary for the defense of injunctive</p>	12 months after collection, unless employment relationship is established with the data subject

Policy for children

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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 your 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 set out 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

4. ACCESS TO DATA BY PROCESSING EMPLOYEES

Your data may be made accessible for the exclusive purposes set forth in this notice:

- 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 processors 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 your 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 Processing activities on your Personal Data. 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, your Personal Data may be disclosed to public bodies or judicial authorities without, however, being defined as Recipients. In fact, the regulation states that public authorities that receive 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 your 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;

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- Providers of IT infrastructure and solutions;
- Web service providers;
- Banks and payment service providers, acting as Processors, to whom your personal data may be disclosed for the purpose of processing your payments;
- 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 Data Processors and Authorized Persons is kept at the Data Controller's office and is available upon request to be made by e-mail at

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

Your 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 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 its 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 its 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.).
- Contents of chats with other users
- Financial information for transactions

Flora retains only the information strictly necessary to provide its 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

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- 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 its 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 websites that is contained in web cookies in order to provide advertisements about goods and services of interest to you.

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

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 user interests

Active user consent is required for most cookies.

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

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First-party Cookies 6

[Key Domain Vendor Tags Valid until PHPSESSID www.nove25.net Google Privacy 2078-11-30 15:15:47 _gcl_au .nove25.net Unsigned](#)
[Unsigned 2024-09-04 07:37:57 didomi_token .nove25.net Unsigned Unsigned 2024-12-06 07:37:58 fbp .nove25.net Facebook](#)
[Advertising 2024-09-04 07:38:05 pin_unauth .nove25.net Unsigned Unsigned 2025-06-06 07:38:05 PrestaShop-](#)
[dacb7efb0aa7e4d3790f7b3dff25d7bf .www.nove25.net Unsigned Unsigned 2024-06-26 07:38:02](#)
[Key Domain Vendor Tags Valid until PrestaShop-dacb7efb0aa7e4d3790f7b3dff25d7bf .www.nove25.net Unsigned Unsigned 2024-06-](#)
[26 07:38:02](#)

Third-party Cookies 1

[Key Domain Vendor Tags Valid until ar_debug .pinterest.com Unsigned Unsigned 2025-06-06 07:38:05](#)

Requests in EU 43

[URL Country ISP https://www.nove25.net/it/ Netherlands Datacamp Limited](#)
[https://www.nove25.net/themes/nove25/assets/cache/theme-9450561215.css?ver=1.1.72 Netherlands Datacamp Limited](#)
[https://www.nove25.net/themes/nove25/assets/css/font-awesome/css/font-awesome-preload.css Netherlands Datacamp Limited](#)
[https://www.nove25.net/themes/nove25/assets/cache/bottom-3b2e211323.js?ver=1.0.80 Netherlands Datacamp Limited](#)
[https://www.googletagmanager.com/gtm.js?id=GTM-KPLSHWB Netherlands Google LLC https://custom.clerk.io/nove.js Germany](#)
[Amazon Technologies Inc. https://510001829.collect.igodigital.com/collect.js Ireland Amazon.com](#)
[https://www.googletagmanager.com/gtag/js?id=G-QM57C5EG9Z&l=dataLayer&cx=c Netherlands Google LLC](#)
[https://connect.facebook.net/en_US/fbevents.js Netherlands Facebook, Inc.](#)
[https://www.googletagmanager.com/gtag/destination?id=AW-754515721&l=dataLayer&cx=c Netherlands Google LLC](#)
[https://api.clerk.io/v2/config/load?payload=%7B%22mode%22%3A%22live%22%2C%22key%22%3A%22CRggCxZt4jMEzqSUI88wzU](#)
[EkMJHkMJLA](#)
[URL Country ISP](#)

Requests out of EU 187

[URL Country ISP https://nove25.kleacks-cdn.com/themes/nove25/assets/css/simplebar.css Canada Cloudflare, Inc.](#)
[https://nove25.kleacks-cdn.com/themes/nove25/assets/css/font-awesome/fonts/fontawesome-webfont.woff?v=4.7.0 Canada Cloudflare,](#)
[Inc. https://nove25.kleacks-cdn.com/img/cms/pagine/newdrop/drop4_2024/drop4_mobile.jpg Canada Cloudflare, Inc.](#)
[https://nove25.kleacks-cdn.com/themes/nove25/assets/css/font-awesome/fonts/fontawesome-webfont.woff?v=4.7.0 Canada](#)
[Cloudflare, Inc. https://nove25.kleacks-cdn.com/img/cms/pagine/newdrop/drop4_2024/drop4_desktop.jpg Canada Cloudflare, Inc.](#)
[https://nove25.kleacks-cdn.com/themes/nove25/assets/css/extra.css?v=1717659474 Canada Cloudflare, Inc. https://nove25.kleacks-](#)
[cdn.com/modules/rcpqtgtagmanager/views/js/hook/trackingclient.bundle.js Canada Cloudflare, Inc. https://api.cartstack.com/js/customer-](#)
[tracking/www.nove25.net_d61eb85f9d9186a970503cb50de5bbb1.js United States Amazon Technologies Inc.](#)
[data:image/svg+xml.%3Csvg xmlns='http://www.w3.org/2000/svg' viewBox='0 0 455 5](#)

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.

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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.

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 accordance with the appropriate and adequate safeguards for the purposes of the transfer itself, pursuant to 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 your data, obtain confirmation of the existence or otherwise of personal data concerning you, even if not yet registered, and their communication in 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 chosen by you in accordance with your 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) on legitimate grounds 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 of 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 *your consent or due to the 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.*

-Right to withdraw consent: consent to data processing may be withdrawn at any time by the data subject.

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9.HOW TO EXERCISE RIGHTS

You may exercise your rights at any time by sending a request by email to info@nove25.net 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.AMENDMENTS TO THIS POLICY

The Data Controller reserves the right to make changes to this Privacy Policy at any time by giving notice to users on this site. Therefore, please consult this page often, taking as reference the date of last modification indicated at the end of the document. In case of non-acceptance of the changes made to this Privacy Policy you may request the Data Controller to delete the personal data concerning you.

Unless otherwise specified, the previous Privacy Policy will continue to apply to personal data collected up to that point.

11.ACCEPTABLE USE POLICY FOR WEBSITE USERS AND WEBSITE ACCOUNT HOLDERS OWNED BY:

www.nove25.net

Please read this Acceptable Use Policy ("policy", "AUP") carefully before using the [website] website ("website", "service") operated by [name] ("we", "us", "our").

The services we provide may only be used for lawful purposes. You agree to comply with all applicable laws, rules and regulations in connection with your use of the services. Any material or conduct that, in our judgment, violates this policy in any way may result in suspension or termination of the services or removal of your account with or without notice.

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.).
- Distributing pornography or adult content or offering 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.

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.

12.PROCEDURE OF REVOCATION OF CONSENTS ON THE PROCESSING OF ENTITY DATA:

- **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: MI-1733121**

Dear User, You may request revocation of one or more of the privacy consents listed below by sending an email to the following address: info@pec.nove25.net or to info@nove25.net and stating one or more of the options you wish to revoke.

- **Revocation of Email Communications**

- **Revocation of third-party marketing communications by email**

- **Revocation of profiling cookies**

- **Revocation of third-party profiling marketing cookies**

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

HOW TO DISABLE COOKIES 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 lanavigation
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 one 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 lanavigation
3. Select Options
4. Select the Privacy panel
5. Click Show Advanced Settings
6. In the "Privacy" section, click "Content Settings" button.

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7. In the "Tracking "section you can change the following settings related to cookies: - 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: - By enabling "Use custom settings" select 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 every 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 OptionsInternet.
3. Click on the Privacy tab and in the Settings section change the slider to 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 cookies click on Details

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

Safari iOS(mobile devices)

1. Running the iOS Safari Browser
2. Tap on Settings and then Safari
3. Tap on BlockCookie 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
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.

13. 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.

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**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

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.

14. CONTACTS

For clarification or elucidation of this Privacy Policy, please contact us at:

- **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: MI-1733121**
- **PEC info@pec.nove25.net or to info@nove25.net**