# Privacy Policy - Re di Denari srl

Effective as of 01.01.2019

# Welcome to Re di Denari srl! Thank you for choosing to use our services.

# Please read this Privacy Policy carefully.

This Privacy Policy describes how we collect, use, process, and disclose your information, including personal information, in conjunction with your access to and use of the Re di Denari srl Services.

# 1. Definitions -

The following terms shall have the following meaning:

"Service" or "Services": access to our site <u>https://assodicoppe.app4shop.cloud/</u> as well as your subscription to and any Order of our services, products, applications, tools, offline components and features (individually the "Service" or collectively, the "Services") provided by our company SAS Re di Denari srl, together with its affiliates, officers, directors, employees, agents and subsidiaries (hereinafter "Re di Denari srl", "we", "our" or "us").

"**Application**": mobile or desktop application created by the User through Re di Denari srl and made available to the public for download from a third-party platform or accessible from a web browser

"User": any person or entity having an account allowing access to our Services.

"End User": Any person or entity who actually uses our Service(s). It can be users, visitors and customers of our User's Application.

"Website User": Any person visiting one of our websites

Any other capitalized terms not defined in this Privacy Policy have the meanings in our Terms of Services.

# 2. Information we collect -

#### 2.1 Information you voluntarily provide to us

When you sign up for and use the Services, consult with our customer service team, send us an email, post on our blog, integrate the Services with another website or service (for example, when you choose to connect your WordPress website with Re di Denari srl), or communicate with us in any way, you are voluntarily giving us information that we collect. That information may include either your or your End Users' name, physical address, email address, IP address, phone number, credit card information, as well as details including gender, occupation, location, and other demographic information. By giving us this information, you consent to this information being collected, used, disclosed, transferred to Europe and stored by us, as described in our Terms of Use and in this Privacy Policy.

# 2.2 Information collected automatically

When you use the Services or browse one of our websites, we may collect information about your visit to our websites, your usage of the Services, and your web browsing. That information may include your IP address, your operating system, your browser ID, your browsing activity, and other information about how you interacted with our Websites or other websites. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies.

# 2.3 Information from your use of the Service

We may receive information about how and when you use the Services, store it in log files or other types of files associated with your account, and link it to other information we collect about you. This information may include, for example, your IP address, time, date, browser used, and actions you have taken within the Services. This type of information helps us to improve our Services for both you and for all of our users.

# 2.4 Cookies and tracking

We and our partners may use various technologies to collect and store information when you use our Services, and this may include using cookies and similar tracking technologies on our Website, such as pixels and web beacons, to analyze trends, administer the website, track users' movements around the website, serve targeted advertisements, and gather demographic information about our user base as a

whole. Users can control the use of cookies at the individual browser level. We partner with third parties to display advertising on our website or to manage and serve our advertising on other sites. Our third party partners may use cookies or similar tracking technologies in order to provide you advertising or other content based upon your browsing activities and interests. If you wish to opt out of interest-based advertising click http://preferences-mgr.truste.com/ (or if located in the European Union

click http://www.youronlinechoices.eu/). Please note you might continue to receive generic ads. For more information, please refer to our Cookie Policy.

# 2.5 Information from the use of our Applications

When you use our mobile apps (for instance My Re di Denari srl or Re di Denari srl News), we may collect certain information in addition to information described elsewhere in this Policy. For example, we may collect information about the type of device and operating system you use. We may ask you if you want to receive push notifications about activity in your account. If you have opted in to these notifications and no longer want to receive them, you may turn them off through your operating system. We may ask for, access or track location-based information from your mobile device so that you can test location-based features offered by the Services or to receive targeted push notifications based on your location. If you have opted in to share those location-based information, and no longer want to share them, you may turn sharing off through your operating system. We may use mobile analytics software (such as crashlytics.com) to better understand how people use our application. We may collect information about how often you use the application and other performance data.

#### 3. How we use collected information -

We may use and disclose Personal Information for the following purposes:

# 3.1

To promote use of our Services to you and others. For example, if we collect your Personal Information when you visit our Website and do not sign up for any of the Services, we may send you an email inviting you to sign up. If you use any of our Services and we think you might benefit from using another Service we offer, we may send you an email about that. You can stop receiving our promotional emails by following the unsubscribe instructions included in every email we send. In addition, we may use information we collect in order to advertise our Services to you or suggest additional features of our Services that you might consider using.

# 3.2

To bill and collect money owed to us by our Users. This includes sending you emails, invoices, receipts, notices of delinquency, and alerting you if we need a different credit card number. We use third parties for secure credit card transaction processing, and we send billing information to those third parties to process your orders and credit card payments.

# 3.3

To send you messages related to your use of the Services. For example, we may inform you of temporary or permanent changes to our Services, such as planned outages, new features, version updates, releases, abuse warnings, and changes to our Privacy Policy.

# 3.4

To communicate with our Users about their account and provide customer support.

# 3.5

To enforce compliance with our Terms of Use and applicable law. This may include developing tools and algorithms that help us prevent violations.

# 3.6

To protect the rights and safety of our Users and third parties, as well as our own.

# 3.7

To meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms. To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.

# 3.8

To provide information to representatives and advisors, including attorneys and accountants, to help us

comply with legal, accounting, or security requirements.

### 3.9

To provide, support, and improve the Services we offer. This includes our use of the data that our Users provide us in order to enable our Users to use the Services to communicate with their End Users. This also includes, for example, aggregating information from your use of the Services or visit to our Websites or Applications created with our Service and sharing this information with third parties to improve our Services. This might also include sharing your information or the information you provide us about your End Users with third parties in order to provide and support our Services or to make certain features of the Services available to you. When we do have to share Personal Information with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the Personal Information we transfer to them in a manner that is consistent with this policy.

#### 4. Data Collected for and by our Users -

As you use our Services, you may import into our system Personal Information you have collected from your End Users or other individuals. We have no direct relationship with your End Users or any person other than you, and for that reason, you are responsible for making sure you have the appropriate permission for us to collect and process information about those individuals. Consistent with the uses of Personal Information covered in Section 3, we may transfer Personal Information of you or your End Users to companies that help us promote, provide, or support our Services or the services of our Users ("Service Providers"). All Service Providers enter into a contract with us that protects Personal Information and restricts their use of any Personal Information consistent with this policy. As part of our Services, we may use and incorporate into features information you have provided, we have collected from you, or we have collected about End users. We may share this information with third parties in line with the approved uses in Section 3.

When your End Users use the Services or browse your Application, we may collect information about their visit to your Application and their usage of the Services. That information may include IP address, operating system, browser ID, browsing activity, and other information about how they interacted with your Application. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies. We may use this information in line with the approved uses in Section 3-4 to 3-9.

If you are a End User and no longer want to be contacted by one of our Users, please contact the User directly to update or delete your data. If you contact us, we may remove or update your information within a reasonable time and after providing notice to the User of your request.

We will retain Personal Information we process on behalf of our Users for as long as needed to provide our Services or to comply with our legal obligations, resolve disputes, prevent abuse, and enforce our agreements.

### 5. Data controller and Data processor -

#### The User as the Data Controller

Our Customers who have created an Application using Re di Denari srl are responsible for what they do with the personal information they collect, directly or through Re di Denari srl, about their End Users.

The User is the Data Controller and Re di Denari srl is the Data Processor.

You're solely responsible for complying with any laws and regulations that apply to your collection and use of your End Users' information, including personal information you collect about them using the Services or cookies or similar technologies.

You must publish your own privacy policy and comply with them.

We're not liable for your relationship with your End Users or how you collect and use personal information about them (even if you collect it from us or using Re di Denari srl functionality or cookies or similar technologies) and we won't provide you with any legal advice regarding such matters.

#### Re di Denari srl as the Data Controller

For Users and Website Visitors of any of our websites (for instance https://assodicoppe.app4shop.cloud/), Re di Denari srl is the Data Controller.

# 6. Your Rights -

You (in particular, European users) have certain legal rights to obtain information about whether we hold personal information about you, to access personal information we hold about you, and to obtain its

correction, update, amendment or deletion in appropriate circumstances. Some of these rights may be subject to some exceptions or limitations. We will respond to your request to exercise these rights within a reasonable time (and in all cases within 30 days of receiving a request).

Rights which you are entitled to are:

Data access rights Right to restrict processing Right of Rectification Right to Erasure (Right to be Forgotten) Right to object to processing Right to withdraw consent; and Data portability rights

Where applicable law requires (and subject to any relevant exceptions under law), you may have the right to access, update, change or delete personal information.

#### If you are a User

You can access, update, change or delete personal information (or that of your End Users) either directly in your Account or by contacting us at <u>biancomat750501@gmail.com</u> to request the required changes. You can exercise your other rights (including deleting your Account) by contacting us at the same email address.

#### If you are a End User

Where you are using an Application made by one of our User, you will need to reach out directly to that User, the Data Controller, to discuss managing, deleting, accessing, restricting access to or otherwise withdrawing consent for use of, the information which you provided to them while using their Application. Re di Denari srl, as the Data Processor, is not in a position to directly handle these requests. If you are having difficulties finding this User you can contact us at <a href="mailto:biancomat750501@gmail.com">biancomat750501@gmail.com</a> and we will try our best to help you.

Please note that, for technical reasons, there is likely to be a delay in deleting your personal Information from our systems when you ask us to delete it. We also will retain personal Information in order to comply with the law, protect our and others' rights, resolve disputes or enforce our legal terms or policies, to the extent permitted under applicable law.

# 7. How we protect your information -

While no service is completely secure, we have a security team dedicated to keeping personal information safe. We maintain administrative, technical and physical safeguards that are intended to appropriately protect against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse and any other unlawful form of processing of, the personal information in our possession. We employ security measures such as using firewalls to protect against intruders, building redundancies throughout our network (so that if one server goes down, another can cover for it) and testing for and protecting against network vulnerabilities. More information can be found on the Data Processing Agreement (DPA)

# 8. Public information and Third parties -

#### 8.1 Blog

We have public blogs on our Websites. Any information you include in a comment on our blog may be read, collected, and used by anyone. If your Personal Information appears on our blogs and you want it removed, contact us at biancomat750501@gmail.com. If we are unable to remove your information, we will tell you why.

#### 8.2 Social media platforms and widgets

Our Websites include social media features. These features may collect information about your IP address and which page you are visiting on our Website, and they may set a cookie to make sure the feature functions properly. Social media features and widgets are either hosted by a third party or hosted directly on our Website. We also maintain presences on social media platforms including Facebook, Twitter, and Instagram. Any information, communications, or materials you submit to us via a social media platform is done at your own risk without any expectation of privacy. We cannot control the actions of other users of these platforms or the actions of the platforms themselves. Your interactions with those features and platforms are governed by the privacy policies of the companies that provide them.

#### 8.3 Links to third-party websites

Our Websites include links to other websites, whose privacy practices may be different from ours. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Website you visit.

#### 8.4 Service Providers

Sometimes, we share your information with our third party Service Providers, who help us provide and support our Services. For example, if it is necessary to provide you something you have requested (like enable a feature such as Social Profiles), then we may share your and/or your End-Users' Personal Information with a Service Provider for that purpose. Just like with the other third parties we work with, these third party Service Providers enter into a contract that requires them to use your Personal Information only for the provision of services to us and in a manner that is consistent with this policy.

# 8.5 Advertising partners

We may partner with third party advertising networks and exchanges to display advertising on our Websites or to manage and serve our advertising on other sites and may share Personal Information with them for this purpose. All third parties with which we share this information are required to use your Personal Information in a manner that is consistent with this policy. We and our third party partners may use cookies and other tracking technologies, such as pixels and web beacons, to gather information about your activities on our Websites and other sites in order to provide you with targeted advertising based on your browsing activities and interests.

# 9. Changes to this privacy policy -

Re di Denari srl has the discretion to update this privacy policy at any time. When we do, revise the updated date at the top of this page. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

#### 10. Your acceptance of these terms -

By using our Services, you signify your acceptance of this policy and Terms of Service. If you do not agree to this policy, please do not use our Services. Your continued use of the Services following the posting of changes to this policy will be deemed your acceptance of those changes.

# **11. Contacting us** - Data Protection Officer (DPO)

Re di Denari srl designated Fabiola Roscini, AD, as Data Protection Officer, as required by GDPR

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at: biancomat750501@gmail.com

All Legal notices to Re di Denari srl shall be sent to: Re di Denari srl, Strada Tiberina 114 Deruta (PG) Italy (for updated contact go to: https://assodicoppe.app4shop.cloud);