

# Privacy Policy in effect from 25 May 2018

Last updated: 25 May 2018

## SUMMARY OF THE INFORMATION

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## SCOPE OF

The Data Controller scrupulously respects the privacy of all users who access the website [www.sellrapido.com](http://www.sellrapido.com) or the services connected to it (which will be referred to as a "Platform"), from any PC, application, mobile device, platform or other means of access or use.

In this statement we want to describe you in a transparent, detailed and comprehensive way such as:

- we collect;
- we share
- we use;
- we protect;

your personal information.

By taking advantage of the Platform and its services, you are aware that we will use your personal data as described in the information notice.

## **LEGAL BASIS**

The legal basis on which this information is based is the European Data Protection Regulation no. 679/2016 of 27 April 2016 on the protection of individuals with regard to the processing and free circulation of personal data, in particular art. 13 of the Rules

## **WHAT THE INFORMATION DOES NOT REFER TO**

This information does not refer to and does not regulate the services offered by third parties (possibly accessible by means of links placed on the Platform) and related methods of processing your personal data.

We advise you to read carefully on their third party websites their privacy policies on how they will process your personal data and how they will be shared.

On these third parties the owner has no control and therefore declines all responsibility regarding the processing of your personal data carried out by these sites.

## **INFORMATION UPDATE**

We will modify the information with additions or variations to make it up-to-date with the law and adequate with respect to any technical changes made to the Platform or to any changes in the purposes or methods of processing your data.

We will inform you of any changes with specific warnings. We advise you to check this page periodically to stay updated.

Each updated version, which will be accompanied by its date, will be published on this web page and will become effective in your comparisons immediately after its publication.

## **HOLDER OF THE PROCESSING OF PERSONAL DATA**

The holder of the processing of your personal data through the Platform is Selrapido S.r.l. with registered office in Bologna (BO), via Montello n. 14, P.Iva and C.F. 03270551207, e-Mail: [privacy@sellrapido.com](mailto:privacy@sellrapido.com) (which will also be referred to as "Holder").

You can contact us by sending an email to [privacy@sellrapido.com](mailto:privacy@sellrapido.com)

## **WHAT ARE THE PERSONAL DATA WE COLLECT**

When you use the platform, we will collect your personal data only if you send it to us directly or through automatic systems that allow the regular operation of the Platform. Some personal data we need to identify you, others are optional but may be necessary to use some services of the Platform.

In particular, we may collect your personal data in these categories:

### *1. PERSONAL DATA THAT YOU SUPPLY VOLUNTARILY*

These are the data you provide us in a free and optional way, for example when you send us an e-mail to our e-mail address indicated on the Platform or fill out our contact form.

In these cases we will acquire your personal data necessary to respond to you, as well as any data that you have sent us in your communication. We will not disseminate or disclose this information to third parties, and we will not use them to define your profile or personality. Finally we will save them only as correspondence.

Your personal data that you can voluntarily provide us are:

- identification data such as name, surname, e-mail - required during the registration phase of the Platform (or later, when required for the execution of specific services);
- data relating to the ways in which you use the Platform;
- additional information that you will send us via the forms on the Platform;
- the information you provide to us when registering for newsletters, as well as navigation information, including the c.d. technical and / or profiling cookies, etc .;
- information relating to your navigation within the Platform.

The legal basis for these treatments is the fulfillment of the contract (Article 6.1-b of the Regulations) or, depending on the case, the fulfillment of a legal obligation to which the Data Controller is subject (Article 6.1-c of the Rules) .

Data relating to your payments will not be stored, which will be managed by Paypal. To understand how Paypal manages your data, visit the web page <https://www.paypal.com/it/webapps/mpp/ua/privacy-full> where you can find the privacy policy.

## *2. PERSONAL DATA THAT YOU SUPPLY TO USE SERVICES ACCESSIBLE WITH CREDENTIALS*

Some of the services of the Platform are reserved only for users who carry out the registration procedure. To complete the registration process we need some personal data, in particular:

- your name and surname;
- your email;
- indication of the spoken language;
- your tax code;
- your telephone number;
- your residence address.

The legal basis for these treatments is the fulfillment of the contract (Article 6.1-b of the Regulations) or, depending on the case, the fulfillment of a legal obligation to which the Data Controller is subject (Article 6.1-c of the Rules) .

You will also need to tell us, where required, a username and password that will identify you. Any other personal data requested during the registration process is optional and entirely remitted to your will.

### HOW WILL WE USE IT?

We will use the information you provide to use the services accessible with your credentials, only after obtaining your consent, together with your home address, to perform the following activities:

- invoice any paid services and / or purchases of products that you request;
- for any purpose strictly connected to the execution of the services we offer you on the Platform.

If you do not tell us this information we will not be able to take advantage of some or all of the services we offer on our Platform.

We will also use your data:

- only if you provide us with appropriate consent as result of the check of the item "I expressly consent to the collection of personal data for profiling purposes", to study your interests and define your individual and / or group profile. This activity serves us to send you (where you have consented to receive our communications for advertising and commercial purposes) (even customized) updates on our activities, in particular on our new services / products, on our special offers, on surveys and / or opinions and other types of communication relating to our services and for the preparation of statistical and commercial research studies - that are in line with your interests. It is therefore our legitimate interest (article 6.1-f of the Rules) to verify your preferences and define your own profile (even specific) so as to be able to customize our offer;

- only if you provide us with specific consent as result of the checkbox "I consent to the processing of my personal data for commercial and promotional purposes" to send you updates (even personalized) - on our activities, in particular on our new services / products , on our special offers, on surveys and / or opinions and on other types of communication related to our services and for the preparation of studies of statistical and commercial research - that are in line with your interests. It is therefore our legitimate interest (article 6.1-f of the Rules) to be able to use your personal data to send you commercial communications in line with your preferences so that we can personalize our communications.

Your consent to these processing of your data is optional (and freely modifiable even if you have consented, by simple request to the email address [privacy@sellrapido.com](mailto:privacy@sellrapido.com) or different methods indicated by the Owner, without any further formalities) and your refusal not will result in the inability to use the services of the Platform.

### *3. NAVIGATION DATA*

The telematic and information systems that allow the Platform to function automatically acquire, during their normal operation, some of your personal data relating to navigation.

In particular, when browsing the Platform we collect:

- your IP address;
- the number of your accesses;
- the duration of your navigation;
- the name of your browser;
- the pages you have viewed;
- the date and time when you logged in;
- additional parameters related to the operating system you used to connect.

The legal basis for these treatments is the pursuit of the legitimate interest of the data controller (article 6.1-f of the Rules).

#### **HOW WE WILL USE IT**

We collect your browsing data only to obtain anonymous statistical information on how you use our platform and to check that it works properly. These data however, by their very nature, they may allow us to trace your identity, even through processing and association with other data held by third parties.

#### **HOW WE WILL NOT USE IT**

Your browsing data are in no case used for marketing purposes, to define your profile or your personality, to send you advertising material, to carry out market research or commercial communications - and we will only keep them temporarily.

### *4. SUBSCRIPTION TO THE NEWSLETTER*

Our newsletter service is reserved for users who register. For the provision and management of this service, we use the services and tools provided by the Internet site called 'MailChimp'. For more information on how this third party will process your personal data we advise you to carefully read their privacy policy by clicking on this link: <https://mailchimp.com/legal/privacy/>.

If you do not provide us with the registration information, we can not provide you with the newsletter service. The legal basis for these treatments is the fulfillment of the contract (Article 6.1-b of the Rules).

#### **PURPOSE OF THE TREATMENT**

We will use your personal data to provide you with the services requested and to customize and continuously improve your experience of use of our platform by the user.

In case you have not completed the age of 18 (eighteen), or you do not have the ability to act, this Information is addressed to the person appointed by the Italian law in force, which remains the only person authorized to provide us consent to the processing of your personal data.

The processing of your personal data that you have communicated will be carried out by us, with or without the aid of electronic tools, according to principles of correctness, lawfulness, transparency, in order to protect your privacy and your rights in respect of what is foreseen by the current legislation.

These data will not be disclosed or communicated in any way to external subjects, without prejudice to the obligations established by applicable laws.

### **RECIPIENTS OF PERSONAL DATA**

Unless otherwise specified in relation to the individual purposes of the processing as specified above, your personal data may be disclosed to - or otherwise be aware of - persons in charge and / or responsible (including external) of the treatment, in relation to the skills and functions of each one, in order to satisfy the purposes or to implement specific regulatory and / or contractual obligations.

The personal data that you have communicated to us are not generally communicated to other subjects, unless this is necessary for regulatory or contractual provisions or to fulfill specific obligations.

In these cases, we may have to disclose your personal data to some of these subjects:

- consultants or collaborators, internal and / or external, for compliance with current legislation and / or for the performance of contractual services in relations with the individuals concerned (for example, labor consultants, legal advisors, accountants, tax consultants, auditors , etc.);
- judicial authorities or other public authorities, in compliance with the purposes of the processing of your data or for legal obligations.

You can request a complete list of data processors by sending an email request to this address [privacy@sellrapido.com](mailto:privacy@sellrapido.com).

### **LOCALIZATION AND EVENT TRANSFER OF YOUR PERSONAL DATA**

Your personal data are stored in the European Economic Area (also referred to as 'AEE'), and specifically are stored on servers by <https://www.hetzner.de/>

We also reserve the right to transfer your personal data to countries that guarantee an adequate level of security, based on the adequacy decisions of the European Commission or on the basis of the adequate guarantees required by current legislation.

### **PROTECTION OF YOUR PERSONAL DATA**

We use highly advanced encryption technologies and periodic backups to protect the integrity and privacy of your data.

### **PERIOD OF CONSERVATION OF YOUR PERSONAL DATA**

We will also keep your personal data for as long as necessary to fulfill the obligations established by law, resolve disputes and enforce the agreements concluded.

Your personal data will therefore be kept, as required by law, for a period of time not exceeding that necessary to achieve the purposes for which we are treating them, in particular:

- in relation to the management of the existing contractual relationship, the data will be kept for the times defined by the relevant legislation and, at the termination of the relationship, for the ten-year term for the conservation of only data of a civil nature;
- in relation to the management of personal data that you may have communicated to us when you registered for our services accessible through credentials and / or newsletter service for as long as such registration remains active;
- in relation to the processing of your personal data for marketing purposes and analysis of consumption habits and choices, and only if you have provided us with a specific consent (optional), we will retain the data collected for the time strictly necessary for the management of the aforementioned purposes according to criteria based on compliance with current regulations and the correctness and balance between our legitimate interest and your rights and freedoms. In the absence of specific rules that provide for different storage times, and in the absence of your new explicit consent that you will have to express near the approach of the following deadlines, we will use your data for marketing purposes for a maximum of 24 months and then we will delete them;
- in relation to the processing of your personal data for profiling purposes, and only if you have provided us with a specific consent (optional), we will retain the data collected for the time strictly necessary for the management of the above purposes according to the criteria based on the respect of the regulations in force and on the correctness and balance between our legitimate interest and your rights and freedoms. In the absence of specific rules that provide for different storage times, and in the absence of your new explicit consent that you will have to express near the approach of the following deadlines, we will use your data for marketing purposes for a maximum of 12 months and then we will delete them.

In any case, we will take every care to avoid the use of your data indefinitely, proceeding periodically to verify in an appropriate way your actual interest in giving us the opportunity to process data for marketing purposes - activities that we will achieve through contact methods automated, like eMail.

## **WHAT ARE YOUR RIGHTS**

As interested in the processing of your personal data you have the right to ask us:

- confirmation that the processing of your personal data is currently underway and, in this case, obtaining access (access right);
- the correction of your inaccurate personal data, or the integration of your incomplete personal data (right of rectification);
- the cancellation of your data, if there is one of the reasons provided for by the Regulation (right to be forgotten);
- the limitation of the processing of your data when one of the hypotheses provided for by the Regulation (limitation right) occurs;
- to receive your data in a structured, commonly used and automatically readable form by automatic device and to transmit, where technically possible, such data to another data controller (right to portability).
- the right to withdraw consent to the processing of your data, at any time, without prejudice to the lawfulness of the treatment based on consent given prior to revocation and to oppose processing for marketing purposes or other additional purposes at any time (right of opposition );
- the right to object, for legitimate reasons, to the processing of your data even if relevant to the purpose of the collection;
- the right to object to the processing of your data for the purpose of sending advertising materials or direct sales or for carrying out market research or commercial communications.

## **AUTOMATED DECISION MAKING**

We inform you that you also have the right not to be subjected to a decision based solely on the automated processing of your personal data, including profiling, which produce legal effects that affect you or that still significantly affect your person (unless this automated activity is necessary for the conclusion or execution of a contract between you and the Controller, is authorized by the law of the Union or of the Member State to which we are subject as Holders (which also specified appropriate

measures to protect your rights, your freedoms and legitimate interests) - or ultimately based on your explicit consent.

### **INFORMATION**

You can exercise the above mentioned rights at any time by submitting a simple request to this e-mail address [privacy@sellrapido.com](mailto:privacy@sellrapido.com).

We will contact you or inform you as soon as possible and, in any case, within 30 (thirty) days from the date of your request.

### **COMPLAINTS**

If you believe the personal data protection legislation has been violated regarding the processing of your data, you also have the right to file a complaint before the Local Data Protection Authority in the European Economic Area ( 'EEA'). You can find the references of the individual Authorities, depending on the country in which you are, by clicking on this link <http://www.garanteprivacy.it/web/guest/home/footer/link>.

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