



registered office:  
Via Bagutta, 13  
20121 Milano (MI) – ITALY  
P.Iva: IT03272480132

## **PRIVACY POLICY**

In compliance with the obligations arising from Italian legislation (D. Lgs. 30 June 2003 n. 196 and subsequent amendments and additions) and from European legislation ("Regulation EU on the protection of natural persons with regard to the processing of personal data and on the free movement of such data - GDPR" n. 679/2016), we inform You that this website respects and protects the privacy of visitors and Users, putting in place every possible and proportionate effort not to infringe their rights. In fact, we believe that the User must know the purposes and type of data collected, in order to exercise adequate control over both areas. This website is committed to the application of current legislation with a view to "by default" protection, withholding only personal data to the necessary and sufficient extent for the purposes provided and for the period strictly necessary for these purposes, and "by design" by designing the privacy function and preventing any design problems.

This Privacy Policy applies to visitors/Users of the website and applies to information collected through channels other than this website. The purpose of the Privacy Policy is to provide maximum transparency regarding the information that the website collects and how it uses that.

For information about Yours personal data collected, the purposes and subjects with which the data are shared, you can contact the Data Controller.

### **Data Controller**

D. NAVA 1961 s.r.l.  
P.IVA IT03272480132  
Via Bagutta, 13 – 20121 Milano (MI) – ITALY  
Telephone: +39 02/94756235

### **Types of data collected**

The Data Controller does not provide a list of types of personal data collected.

Full details on each type of data collected are provided in the dedicated sections of this Privacy Policy or through specific informative texts displayed before the collection of the data.

Personal data may be freely provided by the User or, in the case of usage data, collected automatically during the use of this website.

Unless otherwise specified, all data requested by this website are mandatory. If the User refuses to communicate them, it may be impossible for the website to provide the service. In cases where the website indicates certain data as optional, Users are free to refrain from communicating such data, without this having any consequences on the availability of the service or its operation.

Users who have doubts about which data is mandatory are encouraged to contact the Data Controller. The possible use of cookies - or other tracking tools - by this website or by third-party services owners used by the website itself, unless otherwise specified, has the purpose of providing the service requested by the User, in addition to the additional purposes described in this document and in the Cookie Policy, if available.

The User assumes responsibility for the personal data of third parties obtained, published or shared through this website and guarantees to have the right to communicate or disseminate them, freeing the Data Controller from any liability to third parties.



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## **Method and place of data processing**

### **Data processing method**

The Data Controller shall take appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of the personal data.

The data processing is carried out by means of computer and/or telematic tools, with organizational methods and logic strictly correlated with the purposes indicated. In addition to the Data Controller, in some cases, other parties involved in the organization of this website (administrative, commercial and legal staff, marketing department staff, system administrators) or external subjects may have access to the data (as third-party technical service providers, postal couriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, Data Processors by the Data Controller. The updated list of Data Processors may be requested to the Data Controller at any time.

### **Legal basis for data processing**

The Data Controller processes User's personal data if one of the following conditions is met:

- the User has given consent for one or more specific purposes (note: in some jurisdictions the Data Controller may be authorised to process personal data without User consent or another of the legal bases specified below, until the User objects to such processing. However, this does not apply if the processing of personal data is regulated by European legislation on the protection of personal data);
- the processing is necessary for the execution of a contract with the User and/or for the execution of pre-contractual measures;
- the processing is necessary to fulfil a legal obligation to which the Data Controller is subject;
- the processing is necessary for the performance of a task in the public interest or for the exercise of public authority by the Data Controller;
- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties.

However, it's anytime possible to ask the Data Controller to clarify the concrete legal basis of each processing and in particular to specify whether the processing is based on the law, provided by a contract or necessary to conclude a contract.

### **Place of data processing**

The data are processed at the operating offices of the Data Controller and at any other place where the parties involved in the processing are located. For further information, contact the Data Controller.

Your personal data may be transferred to a country other than the country where you are located. To obtain further information on the place of processing, the User can refer to the section containing details on personal data processing.

The User has the right to obtain information about the legal basis of the transfer of data outside the European Union or to an international public law organization or constituted by two or more countries, such as the UN, as well as about the security measures taken by the Data Controller to protect the data.

If one of these transfers takes place, the User can refer to the respective sections of this document or ask the Data Controller for information by contacting him at the contact details above.

### **Retention period**

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

- personal data collected for purposes connected to the execution of a contract between the Data Controller and the User will be retained until the execution of such contract is completed;
- personal data collected for purposes connected to the legitimate interest of the Data Controller will be retained until the satisfaction of this interest. The User can obtain further information about the legitimate interest pursued by the Data Controller in the relevant sections of this document or by contacting the Data Controller.

When processing is based on User consent, the Data Controller may retain the personal data for longer until such consent is withdrawn. In addition, the Data Controller may be obliged to store the personal data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the personal data will be deleted. Therefore, upon expiry of this period, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

### **User Rights**

Users may exercise certain rights with regard to the data processed by the Data Controller. In particular, the User has the right to:

- withdraw the consent at any time. The User may withdraw the previously expressed consent to the personal data processing;
- object to the data processing. The User may object to the data processing when it takes place on a legal basis other than consent. Further details on the right of objection are indicated in the section below;
- access data. The User has the right to obtain information on the data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the data processed;
- verify and request rectification. The User may verify the correctness of data and request its updating or correction;
- obtain restriction of the processing. When certain conditions are met, the User may request the limitation of the data processing. In this case, the Data Controller will not process the data for any other purpose than for their storage;
- obtain the deletion or removal of personal data. When certain conditions are met, the User can request the cancellation of data by the Data Controller;
- receive data or have it transferred to another Data Controller. The User has the right to receive the data in a structured, commonly used and machine-readable format and, where technically feasible, to obtain its transfer without hindrance to another Data Controller. This provision is applicable when the data is processed with automated tools and the processing is based on User consent, on a contract of which the User is a party or on contractual measures connected with it;
- lodge a complaint. The User may lodge a complaint with the competent data protection supervisory Authority or take legal action.

### **Details on the right to object**

When personal data are processed in the public interest, in the exercise of public powers vested in the Data Controller or to pursue a legitimate interest of the Data Controller, Users have the right to object to processing on grounds relating to their particular situation. Users are reminded that, if their data are processed for direct marketing purposes, they can oppose the processing without providing any reasons. To find out whether the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.



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### **How to exercise rights**

To exercise their rights, Users can address a request to the contact details of the Data Controller indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible, in any case within a month.

### **Further information**

#### **Defence in court**

User's personal data may be processed by the Data Controller in court or in the preparatory stages for the defence strategy against abuse in the use of this website or related services by the User.

The User declares to be aware that the Data Controller may be obliged to disclose data by order of public authorities.

#### **Additional policies**

At User's request, in addition to information included in this Privacy Policy, this website may provide the User with additional and contextual policies regarding specific services or the collection and the processing of personal data.

#### **System logs and maintenance**

For operational and maintenance purposes, this site and any third-party services used by it may collect system logs, that is, files that record interactions and that may also contain personal data, such as User's IP address.

#### **Information not included in this Privacy Policy**

Further information regarding the personal data processing may be requested at any time to the Data Controller using the contact details.

#### **Reply to "Do Not Track" requests**

This website does not support "Do Not Track" requests.

To find out if any third-party services support them, the User is invited to consult their Privacy Policies.

#### **Changes to this Privacy Policy**

The Data Controller reserves the right to change this Privacy Policy at any time, giving information to Users on this page and, if possible, on this website and, where technically and legally feasible, by sending a notification to Users through one of the contact details held. Please therefore consult this page regularly, referring to the date of the last change indicated at the bottom.

If changes affect processing operations whose legal basis is consent, the Data Controller will collect User consent again, if necessary.

#### **Rights of the Children**

If the User/visitor is a person under 16 years, the consent referred to this Policy and, therefore, to the personal data processing must be provided by parents or by those who exercise the protection of the child by sending an email to: [info@domeniconava.it](mailto:info@domeniconava.it)

#### **Updates**

This Privacy Policy is updated on October 1, 2019. D. NAVA 1961 s.r.l. reserves the right to modify or simply to update the content, in part or in full, in compliance with current legislation and subsequent amendments. If such changes have a significant impact on the interested parties, D. NAVA 1961 s.r.l. will take care to communicate it in advance.