

## **Privacy policy**

With this privacy notice, under Italy's Personal Data Protection Code (D.Lgs. n. 196/2003, hereinafter "Privacy Code") and Regulation (EU) 2016/679 (hereinafter "GDPR"), Perfect Vision Srl, company of Italian nationality with registered office in Milan, via Euripide n.1, fiscal code and registration number 08341230962 (hereinafter "Data Controller"), provides website [appiotti.com](http://appiotti.com) users with the following information concerning the processing and protection of their personal data:

### **Data processed and purposes**

The Data Controller will process the identification personal data (such as, for instance, name, surname, e-mail, phone, address – hereinafter "personal data" or "data") disclosed by the user (hereinafter "Data Subject") through the form available on the website [appiotti.com](http://appiotti.com).

The personal data optionally, explicitly and voluntarily provided by the user are used for the purpose of processing any user's requests (thus, for example, when information or clarifications are requested by calling the numbers listed on the website or writing to the e-mail addresses specified therein).

### **Navigation data**

During the ordinary course of operations, IT systems and software procedures for the functioning of this website acquire some personal data whose transmission is implicit in the communication protocols of the Internet.

Such information are not collected in order to be associated with identified interested parties, but by their own nature could, through the processing and elaboration of data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of computer used by those users who connect to the website, URI addresses (Uniform Resource Identifier) of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc.) and other parameters related to the operating system and the user's IT environment.

The data collected could be used to ascertain responsibility in case of any computer crime to the detriment of the website.

## **Cookies**

With regard to the cookies, please refer to the specific cookie notice also based on the indications provided by the Data Protection Authority through Order dated 8 May 2014.

## **Nature of data provision**

With the exception of the surfing data necessary to start computerized and electronic protocols, the provision of personal data by users is free and optional. Nevertheless, the failure to provide such data will result in the impossibility to carry out the requests forwarded or which the user intends to forward.

## **Processing methods**

The usage of personal data is carried out through the operations listed under Article 4 Privacy Code and Article 4 n. 2 GDPR and precisely: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The processing of personal data is carried out through electronic means. Data are stored in electronic archives by the adoption of the minimum safety measures provided for by the legislator. Data are stored for the time strictly necessary to carry out the requests of the concerned party and in any event, in compliance with the law, for no longer than 48 months after the termination of the relationship.

Data collected from users are stored on servers within the European Economic Area ("EEA") but may be transferred to and processed in countries outside the EEA. Any transferral of personal data will be carried out in compliance with the applicable laws.

## **Communication and disclosure**

Data collected will not be communicated or disclosed to third parties without the express consent of those concerned, with the exception of any requests by competent authorities, in compliance with the law.

Perfect Vision Srl does not transfer, sell or share the users' personal data with third parties for marketing purposes. The data shared with third parties are used only to provide the Data Subject with our services.

Only upon the user's express consent, for marketing purposes, personal data are processed in order to send through e-mail, letter and/or sms, in compliance with

the applicable provisions of law, newsletter or communications concerning products or services offered by the Data Controller.

### Special categories of personal data

Pursuant to Articles 26 and 27 Privacy Code and Articles 9 and 10 GDPR, the Data Subject may provide the Data Controller with data definable as “special categories of personal data” and namely those data revealing “*racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation*”. Such categories of data shall only be processed upon the Data Subject’s free and explicit consent, **expressed in written form at the bottom of this notice.**

### Rights of the data subject

1. Right of access: pursuant to Article 15 GDPR, the Data Subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, even if not yet registered, and their communication in intelligible form.
2. Right to information: the Data Subject shall have the right to obtain from the Data Controller information about the processing purposes and methods, categories of personal data, identification details of Data Controller and Data Processors, recipients or categories of recipients to whom the personal data may be disclosed.
3. Right to data portability: every time Perfect Vision Srl processes the user’s personal data through electronic means on the basis of the user’s consent, or on the basis of an agreement, the Data Subject has the right to receive a copy of the data which he has provided to the Data Controller in a structured, commonly used and machine-readable format. This right includes only the personal data provided by the user. Pursuant to Article 20 GDPR, the Data Subject has also the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.
4. Right to rectification: pursuant to Article 16 GDPR, the Data Subject has the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data, included the right to have incomplete personal data completed.
5. Right to erasure: pursuant to Article 17 GDPR, the Data Subject has the right to obtain the erasure of any personal data processed by Perfect Vision Srl at any time.

6. Right to object: pursuant to Article 21 GDPR, the Data Subject has the right to object at any time to processing of personal data concerning him or her. Perfect Vision Srl, therefore, shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.
7. Right to restriction of processing: pursuant to Article 18 GDPR, the Data Subject has the right to obtain from Perfect Vision Srl restriction of processing where one of the following circumstances applies: - if the Data Subject has objected to processing by Perfect Vision Srl on the basis of legitimate grounds, the processing of such data shall be restricted for a period enabling the Data Controller to verify the legitimate grounds; - if the accuracy of the personal data is contested by the Data Subject, Perfect Vision Srl shall restrict the processing for a period enabling the Data Controller to verify the accuracy of the personal data; - the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead; - Perfect Vision Srl no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims.
8. Right to lodge a complaint with the competent supervisory Authority: if the Data Subject considers that the processing of his or her personal data by Perfect Vision Srl is unlawful, he or she shall have the right to inform the Data Controller directly, or to lodge a complaint with a competent supervisory Authority.

#### Procedure for the exercise of rights

The Data Subject will be able to assert his or her own rights at any time, by contacting the Data Controller at the e-mail address [dpo@perfectvision.com](mailto:dpo@perfectvision.com).

#### **Data controller and processors**

The Data Controller is Perfect Vision Srl., with registered office in Milan, via Euripide n.1.

The updated list of the Processors is stored at the registered office of the Data Controller.

**Updates that concern our privacy policy:** This privacy notice may need some updates. Data Subjects will be informed about any material change to the privacy notice.

---

The undersigned Data Subject acknowledges the terms of the privacy notice and agrees with them.

The undersigned Data Subject gives his or her express consent to the processing of his or her personal data according to the methods indicated in the notice.

The undersigned Data Subject also gives his or her express consent to the processing of the “special categories of personal data” according to the methods indicated in the notice.