Privacy Policy

Last update: July 12, 2021

SCOPE OF

The Data Controller scrupulously respects the privacy of all users who access the website www.utopiasis.it or the services connected to it (which we will refer to as a whole as a "Platform"), from any PC, application, mobile device, platform or other means of access or use.

In this information we want to describe you in a transparent, detailed and exhaustive way

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

your personal information.

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

LEGAL BASIS OF REFERENCE

The reference regulatory bases on which this information is based are: the **European General Data Protection Regulation no. 679/2016 of 27 April 2016** relating to the protection of individuals with regard to the processing and free circulation of personal data, in particular art. 13 of the Regulations and **D. Lgs. 10 August 2018, n. 101.**

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 carefully read on the websites of third parties their privacy policies on how they will process your personal data and how they will eventually be shared. The Data Controller has no control over these third parties and therefore declines any responsibility regarding the processing of your personal data carried out by these sites.

COMMITMENT TO UPDATING THE INFORMATION

We will modify the information with additions or changes to make it updated with respect to the legislation and adequate with respect to any technical changes made to the Platform or any changes in the purposes or methods of processing your data.

We will notify you of any changes with specific notices. <u>However, we recommend that you check this page periodically to stay updated.</u> Each updated version, which will be accompanied by its date, will be published on this web page and will become effective for you immediately after its publication.

DATA CONTROLLER

The Data Controller of your personal data through the Platform is the company **Utopia SiS S.pa.** with registered office in Bologna (BO), via Paolo Nanni Costa n. 20, VAT and Tax Code 11655030960, e-Mail: privacy@utopiasis.it, PEC: utopiasis@legalmail.it - (hereinafter also referred to as the "Data Controller").

WHAT ARE THE PERSONAL DATA WE COLLECT

When you use the Platform, we will only collect your personal data if you send them to us directly or through automatic systems that allow the Platform to work properly.

Some personal data are compulsory for us 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 from these categories:

• PERSONAL DATA YOU PROVIDE TO US 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 you fill out our contact forms, where present. In these cases we will acquire your personal data necessary to respond to you, as well as any data you have sent us in your communication. We will not disclose or communicate this data to third parties, and we will not use it to define your profile or personality. Finally, we will keep them only as correspondence.

Your personal data that you can provide us voluntarily are:

• identification data such as name, surname, e-mail or other information that you will send us through the forms on the Platform or by sending e-mails from your e-mail system;

• the so-called technical and / or profiling cookies, etc.

The legal basis for these treatments is the fulfillment of the contract (Article 6.1-b of the Regulation) or, depending on the case, the pursuit of the legitimate interest of the Data Controller (art. 6.1-f of the Regulation).

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, while 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 you made it access;
- further parameters relating to the operating system that you used to connect.

The legal basis for these treatments is the <u>pursuit of the legitimate interest</u> of the data controller (Article 6.1-f of the Regulation).

We collect your browsing data only to obtain statistical information on how you use our Platform and to check that it works correctly. However, these data could, by their very nature, allow to trace your identity, also through processing and association with other data held by third parties.

Your browsing data are in no case used for marketing purposes.

AGE LIMIT

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

METHOD OF TREATMENT

The processing of your personal data that you have communicated to us 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 at all times in compliance with the provisions of current legislation. However, such data will not be disclosed or communicated in any way to external parties, without prejudice to the obligations established by the laws in force.

RECIPIENTS OF PERSONAL DATA

Unless otherwise specified in relation to the individual purposes of the processing as specified in this document, your personal data may be disclosed to - or in any case become aware of - authorized processors, including external (subject to signature of a specific confidentiality agreement), in relation to the skills and functions of each, in order to satisfy the purposes or to implement specific regulatory and / or contractual obligations.

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

In these cases, we may need 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 execution of contractual services in relations with the individuals concerned after signing a specific appointment to
- authorized / confidentiality agreement;
- judicial authority or other public authorities, in compliance with the purposes of the processing of your data or for obligations of law.

You can request a complete list of data processors by sending a request via email to this address privacy@utopiasis.it.

LOCATION AND POSSIBLE TRANSFER OF YOUR PERSONAL DATA

Your personal data are stored within the European Economic Area (also referred to as 'EEA'). We also reserve the right to transfer your personal data to countries that guarantee us an adequate level of security, on the basis of the adequacy decisions of the European Commission or on the basis of the adequate guarantees provided for by current legislation.

PROTECTION OF YOUR PERSONAL DATA

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

PERIOD OF STORAGE 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 stored, as required by law,

for a period of time not exceeding that necessary to achieve the purposes for which we are processing them. In any case, we will take every care to avoid the use of your data indefinitely, proceeding periodically to appropriately verify your actual interest in allowing us to process your data.

WHAT ARE YOUR RIGHTS

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

- confirmation as to whether or not your personal data is being processed and, if so, to obtain access to it (right of access);
- the correction of your inaccurate personal data, or the integration of your incomplete personal data (right of rectification);
- the cancellation of your data, if one of the reasons provided for by the Regulation exists (right to be forgotten);
- the limitation of the processing of your data when one of the hypotheses occurs provided for by the Regulations (right to limitation);
- to receive in a structured format, of common and machine-readable use of your data 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 processing based

- on the consent given prior to the revocation and to oppose the processing at any time for marketing purposes or other additional purposes (right to object);
- the right to object, for legitimate reasons, to the processing of your data even if pertinent to the purpose of the collection;
- the right to object to the processing of your data for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communications.

INFORMATIONS

You can exercise the rights mentioned above at any time by sending a simple request to this email address privacy@utopiasis.it. 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 that the legislation on personal data protection has been violated with regard to the processing of your data, you also have the right to lodge a complaint with the local authority for the protection of personal data within the European Economic Area. ('EEA'). You can find the references of the individual Authorities, depending on the country you are in, by clicking on this link http://www.garanteprivacy.it/web/guest/home/footer/link.

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