

INFORMATIVA EX ART. 13 REG. UE 2016/679

Before providing us with any data about you, read this information carefully to know who we are, what kind of data we process, for what purposes and in what way, and which rights you can assert in relation to the processing of your personal data. We ask you to give us your consent to the processing of your data, but we remind you to do so only if you agree with what is written in this statement. Read it, it's in your best interest!

A) Who is the Data Controller?

The Data Controller is Vaia s.r.l., with registered office in Borgo Valsugana (TN), 38051 in Via Puisle, 23, in the person of the legal representative p.t, Cod. Ateco: 479110, tel. 0461.842063 mobile 340.7730126 - 340.8972281 mail. info@vaia.com, PEC vaiasrl@pec.it

B) What data do we process, where do we collect your personal data, on what legal basis, and where do we treat them?

You provide us with your data by filling in the forms shown on the website under the "Newsletters / Sign in our Community" section.

Generally, we do not treat any data classified as "Particular" pursuant to Article 9 of the Reg EU 679/2016 - GDPR (i.e. data suitable to reveal racial origin or ethnicity, political opinions, religious or philosophical conditions, trade union membership, biometric data suitable for the unique identification of a person's genetic or health-related data, sex life or sexual orientation) or data relating to criminal convictions and criminal offenses pursuant to Article 10 of the GDPR.; should it be necessary to process data of this type, we will request your prior consent.

Some data are stored by the server because they are acquired automatically during your navigation on our site. This is the data that identifies your PC or some of your actions on the site. These data allow us to find you only if we cross them with other information. For a better understanding of these technical aspects, read our information page on cookies and the Privacy Policy, where you will find collection methods for navigation data and storage times.

According to the EU Regulation 2016/679, the processing of personal data is allowed only if one of the following conditions hold:

- the User has given consent for one or more specific purposes;
- the processing is necessary for the execution of a contract with the Data Subject and / or for the execution of pre-contractual measures;
- the processing is necessary to fulfill a legal obligation to which the Data Controller is subject to, or to safeguard the vital interests of the Data Subject or of other natural person;
- the processing is necessary for the performance of a public interest task or for the exercise of public powers vested in the Data Controller;
- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties (i.e. for monitoring computer security, to prevent fraud, when the Data Subject is employed by the Data Controller and the processing takes place due to this relationship, etc ..).

In our case, the processing of your data takes place on the basis of your free and informed consent or, in some cases, to fulfill a contract or a pre- or post-obligation contract, to respond to an information request, to find your request, or to involve you in a project you have been paying attention to.

We will also be able to process web traffic data based on a legitimate interest, to a strictly necessary and proportionate extent, to ensure the security of networks and information, to avoid or restore service blocks, to prevent fraudulent access, etc., as specified in Recital 49 of the EU Regulation 2016/679.

Your data are processed at our office in Borgo Valsugana (TN) or, limited to some computer data, at the Company's data center that manages the hosting space (Aruba) in Arezzo, Milan or Ktis – locations that, however, are located in Europe and are therefore subject to the GDPR.

We also inform you that data processed using IT methods will be transferred abroad limited to applications that take advantage of Google Drive or Dropbox cloud services or other features, which are located outside the EU and are treated in accordance with the provisions of art. 44 (and following) of GDPR.

C) Do we profile?

By profiling, EU Reg. 679/2016 means “any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements”. Who engages in profiling, for example, proceeds to the processing and analysis of information with respect to preferences, habits, consumption choices, with the aim of dividing the interested parties into "profiles" or in homogeneous groups by behavior or specific characteristics (i.e. customer profiling), etc or in order to evaluate habits, the degree of satisfaction with the services, or other.

Vaia does not carry out profiling in a strict sense, but it can use advertising services for the purpose of marketing, use cookies or other funnel or SEO techniques (whose working principles are explained to you in detail in the Cookies Policy, which we invite you to read) or proceed to survey and rank customers' appreciation with respect to the product purchased, revising, where possible, all your data anonymously.

Your data is not used for decision-making of automated data analysis, nor are they used for the release of judicial and administrative deeds or measures.

If you are interested in the details of data profiling, you can contact us to express your opinion and get an explanation about the adopted techniques.

D) Why do we process your data?

We treat your common data for the following purposes:

- 1) to update you about our initiatives, our new products, events or otherwise, or to allow us to periodically send you our newsletters;
- 2) to be able to comply with what is required by the law, regulations and EU legislation, as well as by instructions given by the Control Authorities (for tax regulations, or to collect your consent for the processing of data, or other reasons), to protect our rights also in court, or to perform anonymous statistics (for example anonymous market surveys or verification of anonymous web traffic);
- 3) to promote our activity via telephone (telemarketing and teleselling), newsletters, participation in trade fairs, meetings or focal points in the sector, press relations, direct e-mail marketing (DEM), insertions or banners on other information portals, advertising, web funnelling, partnership enhancement or other techniques for promotional purposes, to optimize the offer itself (also through focused and selected analysis) in case you have given us explicit consent, to improve the quality of customer care and of our sales network.

In particular, regarding point D3), if you give us your consent, you can:

- keep yourself up-to-date on new products and services. The sending of commercial communications, as well as direct sales, can also take place in an automated manner, such as telephone, SMS, MMS, fax, ordinary and electronic mail, video, wap / web banners, internet messaging or push notifications via the app. These communications may include invitations to events, products and services (including viewing of demos, tutorials, digital services and audiovisual media services), including commercial partners with whom we have entered into commercial agreements; they may include market research and surveys, in the limits in which you have authorized the communication of your data to third parties for commercial purposes;
- receive the call of one of our representatives who will explain the products, services, active offers or promotions dedicated to you and formulate contractual proposals or invitations to contract;
- receive information also on products and services of other companies that we believe may be of interest to you, if those are involved in our projects or are our partners (for example our authorized dealers), provided that you have given specific consent to do so and have not withdrawn it;
- improve our services and receive personalized offers, either to communicate initiatives dedicated to you, to offer you advertising based on your interests (including online advertising based on the use of cookies or advertising), or receiving personalized offers based on your habits and propensities to consume or on your belonging to specific types of families and / or groups.

If you have provided us with your account in order to be updated, we will regard your consent to point D3) as explicit, having the latter the same processing purposes.

We remind you that you can, at any time, request cancellation from our mailing list and the interruption of any newsletters or commercial communication services. To cancel, simply select the link at the end of each email received, or send a request to our email address. We remind you that in the event of revocation, the request will be immediately received but in order to be permanently operational a maximum period of 72 hours could be needed, during which further newsletters could be sent to you, whose sending was already planned before receiving such request. This technical period is necessary for us to proceed with the alignment of all the information systems we use.

E) Are you obliged to give us consent for the processing of your data?

As for the treatments outlined in points D1) and D3), if you want us to update you about our initiatives, articles, comments, in-depth analyses of topics to which you have shown interest, invitations to events or new product presentations, you must give your consent, otherwise we will not be able to do what you voluntarily provided your account for.

Regarding the treatments outlined in point D2) your consent is not required; according to the Privacy law their processing can / must be carried out by the Owner without the consent of the person concerned.

F) How do we process your data and how long do we keep them?

We treat the data that concern you both manually and with IT tools. In any case and, above all, when we treat them with IT tools, we take every security measure to prevent them from being lost, spread, deleted etc.

We process your data for as long as necessary, under the purpose for which we collected

them.

We will process the data for marketing purposes for two years from their registration or longer, in case you continue to purchase our products or follow our initiatives and therefore confirm, in fact, your interest in being updated.

When the processing is based on the User's consent, we can keep your personal data longer, until such consent is revoked.

In any case, you can always revoke your consent and request that you no longer receive any updates on our part, being certain that all communications will cease, since the use of spam is foreign to our policy.

We take care to reconcile the reciprocal requirements to limit the storage of your data at the strict minimum, and in any case we ensure that your data is accurate by taking all reasonable steps to cancel or promptly correct the inaccurate data.

We have also excluded the processing of your data when the purposes pursued in individual cases can be achieved through the use of anonymous data (such as, for example, in market research aimed at improving services) or by other means, which allow to identify the Data Subject only in case of need or under request by authorities and police forces (such as, for example, traffic data, your stay on the website or your IP address).

At the end of the retention period your data will be deleted, therefore upon expiration of such term the right of access, cancellation, rectification and the right to data portability could no longer be exercised.

G) To whom do we communicate your data?

Your data will only be communicated to the company's staff in charge of managing your requests, of contacting you in case you have expressed interest and willingness to receive further information regarding our products or specific initiatives or, in any case, or involved in the pursuit of the purposes referred to in point D).

Furthermore, within our company your personal data can become available to people in charge of their processing (such as: outsourced personnel, interns, professionals), to external collaborators (graphic designers, designers, videomakers, artisans) and to the sales network (agents, brokers, distributors), as well as persons, companies, associations or professional offices, internal and external structures, which carry out on behalf of our company supporting tasks, services, activities of assistance and consulting, services to the Company itself, with particular but not exclusive reference to technological, accounting, administrative, legal, tax and financial matters (in particular: legal services, IT services, shipments, document archiving) and company control.

Access to the data may also be permitted by us, in order to carry out hardware or software maintenance work necessary for the functioning of the portal or for the management of some additional functions, even to external parties which, solely for the purposes of the requested service, could become aware of the interested parties' personal data and who will be duly appointed as Data Processors pursuant to art. 28 of the GDPR. All those to whom your data are communicated are obliged, like us, to treat them according to the provisions of the law. Outside the cases of communication mentioned above, the data will not be disclosed to third parties except to comply with legal obligations or to respond to legal and judicial requests. We do not disclose your data, i.e. we do not make it accessible to an undetermined number of subjects, nor do we disclose it to others for their purposes.

H) Rights

I remind you that at any time you are entitled to:

- have confirmation of the existence or non-existence of personal data concerning you, even if not yet recorded, and obtain intelligible communication of the data itself;
- obtain the indication of the personal data's origin, of the processing's purposes or methods, as well as of the logic applied in case of treatment carried out with the aid of electronic instruments;
- obtain the list of subjects or categories of subjects to whom the data are communicated or who become aware of it as Managers or Distributors;
- request the update or the correction of processed data and, in case of processing in violation of the law or in the cases referred to in art. 17 of the EU Regulation 2016/679, their cancellation (right to be forgotten), transformation into an anonymous form or their block;
- request the limitation of data processing;
- request, if you are interested, to integrate the data concerning you;
- object, in whole or in part, to the processing of personal data for legitimate reasons, even if pertinent to the purpose of collection;
- object to the processing of personal data provided for commercial or interactive commercial communication purposes and to be informed by the Data Controller, not later than the moment in which the data are communicated or disseminated, of the possibility of exercising this right free of charge;
- have confirmation of the existence or nonexistence of an automated decision-making process, including profiling pursuant to art. 22, par. 1 - 4 of EU Reg. 2016/679, and at least in these cases information on the logic used, as well as on the importance and on the consequences foreseen by such treatments;
- request the portability of the data that concern you to another Data Controller;
- request to be notified in the event of occurrences that may have resulted in a breach of your data, if this has led to a high risk for your rights and freedoms, under the conditions set forth in art. 34 of the EU Reg. 2016/679.

Requests can be sent in paper form to the Controller's office or via email to info@vaia.com
We remind you that, at any time, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali, www.garanteprivacy.it).