

PRIVACY POLICY

This page outlines the website's supervision procedures of Vaia Srl, owner of the relative navigable domain to the url: <http://www.vaiawood.eu>, corresponding to the portal home page and including other suffixes, if active and with possible redirect on this site; Vaia srl is also the data controller of your personal data.

This is a policy that is given to those who interact with Vaia's web services by browsing its portal, regardless of requests for information, updates and / or from the purchase of our products.

This document therefore provides you with all the information you need to know on how we collect and use information that identifies the users of our portal and, in particular, it contains important information on web safety, on organizational choices and techniques on privacy matters and on the adopted control systems.

Whenever you want to interact with Vaia, to request information or to be updated on initiatives promoted by Vaia, and will voluntarily provide personal data, filling in one of the contact forms available on the website, you will be given a specific statement for the processing of the data that you provide (in the sections Contact, Ask a question, Become a partner, Enter in the Community, or others).

This information is provided only for the reported site and not for other websites that might be consulted by the user through internal links.

The statement is also based on the Recommendation n. 2/2001 that the European authorities for personal data protection, gathered in the Group established by art. 29 of the directive n. 95/46 / EC, have adopted May 17, 2001 to identify some minimum requirements for *on-line* personal data collection, and, in particular, the methods, timing and nature of the information that data controllers must provide to users when they connect to *web* pages, regardless of the purpose of the connection.

This Privacy Policy has been properly formulated to comply with the principles of the GDPR.

At any time of your browsing, by connecting to the home page, you can return to this page, which describes our Privacy Policy.

DATA CONTROLLER

In relation to the consultation of this site, and in the case you request information, support a project of ours, want to become our partner, or buy our products, data relating to identified and identifiable persons will be treated.

The Data Controller is Vaia s.r.l., with registered office in Borgo Valsugana (TN), 38051 in Via Puisse, 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

DATA PROCESSOR AND APPOINTEES

In application of current legislation, the Data Controller is Vaia Srl.

For the execution of its business and to its improve customer service, Vaia can use collaborators. These individuals, where they process personal data, have been appointed Data Processors and have been authorized with limits, privileges, purposes and instructions commensurate to their duties only.

For technical or organizational reasons, Vaia uses the work of third parties including natural persons or companies that operate as artisans of wood or IT and telematic services, administrative and accounting services, postal and archiving, subjects who belong to their own commercial network, outsourcers, graphic designers, video makers and others. These subjects can take the role of external Data Processors or operate independently as distinct Data Controllers or, if the conditions pursuant to art. 26 of the EU Reg 2016/679 hold, as Data Co-Controllers.

When such subjects carry out services on our behalf and act with our coordination and authority, they have been formally qualified as External Data Processors, they have received and accepted the relative appointment in writing and have pledged to carry out the treatments connected to the fulfillment of their duties in full compliance with the instructions received, ensuring the implementation of confidentiality compliance and processing obligations, as well as adopting every technical and organizational measure required by current legislation.

For example, Vaia employs companies and professionals who take care on its behalf of the web, of marketing and social communication, and who, due to their position, may have access to mailing lists or other personal data of those who interact with the website (these however are stored only on the Active Campaign platform owner's servers, if enabled, and eventually imported by the Controller).

The list of the aforementioned subjects is available to interested parties upon request.

In any case, the communication and possible dissemination of personal data take place only according to the provisions of the GDPR, with the consent of the concerned parties or in those cases based on the regulations contained in Articles 6 and 7 of the EU Regulation 2016/679.

In no case will the data be disseminated or disclosed to an unconditional number of people.

SYSTEM ADMINISTRATOR

The function of System Administrator is performed by an external resource, appropriately selected and appointed on the basis of demonstrated competence, which guarantees the implementation of all conservation, storage, retrieval and safeguarding data operations and of IT systems that house them, also in compliance with the Recommendation issued by the Data Protection Authority in 2009 and later modifications and integrations.

This figure will support Vaia in the event of a data breach involving IT systems or the present web portal.

PLACE OF PERSONAL DATA PROCESSING AND DATA STORAGE DURATION

Processing operations connected to the web services of this Portal take place at the aforementioned legal office in Borgo Valsugana and / or limited to data processed on our behalf by the External Data Processors at their respective locations.

We remind you that these subjects are subjected, like us, to the provisions of the Reg. EU 2016/679 and have guaranteed the respect of identical security and confidentiality standards.

The hosting of the Portal resides at Aruba which has farms in Italy (Arezzo, Milan, Rome). Please note that Aruba, due to interoperability or efficiency / continuity needs of its own systems, can also use data centers allocated at their farm in Czech Republic, a Ktis in Europe, which however is subject to the GDPR.

The Controller has adopted cloud solutions, only for particular sharing needs or e-commerce support.

In particular it makes use of the Dropbox functionalities – which, for European users and in view of GDPR compliance, has servers in Europe, allocated in Germany – and of Google Drive, whose farm is located in Belgium (Europe-west-1b).

Both provide for the transfer of navigation data and data, including personal data, which transit abroad from the site in encrypted mode with SSL protocol.

Google in the Data Processing Amendment G Suite, art. 4 et seq., expressly declares to treat the data in accordance with the European legislation on Privacy, ensuring data availability and integrity, as recommended by the Data Protection Authority in 2012, by the Group of 29 in the Guidelines on the use of cloud computing services n. 5/2012 (July 2012) and by the European Commission in Communication COM (2012) 529 of 09.27.2012.

Google also has an ISO27018 Certification for its Cloud Platform which guarantees compliance of data processing with Italian and European regulations.

Moreover, both Google Inc. and Dropbox Inc. have joined the Privacy Shield and are in possession of appropriate and valid certification.

If Vaia will decide to use cloud technology for its systems, it will select the service's lender, ensuring that the virtual platform resides in an EU country that offers adequate guarantees regarding the correct processing of data, also according to the parameters of art. 46 Reg. EU 2016/679.

The data concerning you will be kept only for a strictly necessary time period; in particular

- browsing data: only for the period of the connection session;
- data that you freely provide in filling in the contact form: only for the time necessary to answer you, to process the purchase order you have made (and the connected billing services etc ..), or up to the maximum limit allowed for data storage for promotional purposes.

Vaia will be able to store your data for a longer time period when required by specific regulatory provisions (for example for tax laws) or to judicially protect itself (for example the data that prove that you have given your consent to processing), limited to the terms of prescription or forfeiture of the right to act or to resist in court for contractual or extra-contractual liability (5 or 10 years).

The data of the electronic archives are stored at the hosting that keeps the website

portal online on account of Vaia, and its database and are only handled by technical personnel appointed by the hosting company to process data or occasionally appointed for maintenance operations. Data used for marketing purposes will be kept for a period not exceeding 2 (two) years from the date of collection of the consent, except for the fact that the Controller has assessed and appropriately justified, based on specific characteristics of the product and / or of the customer target, that it should be extended to a longer time period (in any case not more than 5 years), seeing that a treatment limited to only two years would not allow to achieve the purposes for which data was collected.

PRIVACY SERVICE AND EXERCISE OF THE DATA SUBJECT'S RIGHTS

You can contact Vaia Srl's Privacy Service, headed by the Data Controller, for a reply on the exercise of rights pursuant to art. 15 and following in the EU Reg. 2016/679, and to acquire any further information on the subject of privacy, as well as for any information concerning processing of personal data and, in particular, 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 the address published on the site.

Rights related to deceased persons may be exercised by anyone interested in them, as well as, of course, by legitimate heirs.

In exercising the rights, you can grant, in writing, delegation or proxy to individuals or to associations, provided that such proxies or powers of attorney are adequately documented.

TYPE OF PROCESSED DATA

DATA PROVIDED VOLUNTARILY BY THE USER

If you contact our Company via email, we will need to acquire the sender's address, needed to respond to requests, as well as any other personal data entered in the message.

We need your data to allow us to

- send you information with a deferred reply (all sent via e-mail or via telephone interview) and if you have requested to be contacted to describe you characteristics of our product and / or to better illustrate the projects for which you have shown interest;
- contact you if you have sent your data and are interested in becoming our partner or in receiving information about our events or else;
- contact you for any problems or clarifications that might be appropriate to manage your order at best;
- keep you updated on the initiatives you have joined.

If the request for information on one of the products or other information mentioned on the site leads to a subsequent contact with our appointees, starting from that moment the entire offer and any purchase will strictly follow the dictates sanctioned by the Consumer Code for contracts negotiated at a distance and / or outside the business place and, prior to the product request, you will find all the useful information, the methods of use and any other condition regulating the purchase.

When it is necessary to store your data to offer you a better pre- or post-sales service, you will be asked for consent and, in any case, the data be used only for the execution of the contractual relationship and for the consequent charges (tributary or judicial), for accounting needs, or to proceed with the related charges of purchase, as well as for legal obligations or, in any case, for permitted purposes (statistical purposes, verification of the correct functioning of the electronic instrument, verification of hypothetical IT crimes against the site...).

Your data will not be disclosed.

You will be asked to provide data to send you promotional material or newsletters only in the event that you have expressly requested so or authorized it, in written form or through specific point & click sending, relative to the services for which you have shown interest. If in the statement pursuant to art. 13 Reg. EU

2016/679 you have denied the consent to the sending of promotional material, but you have subsequently accepted the sending of newsletters or you have decided to join our community, giving us your mail address will be considered as superseding the dissent you initially communicated and, unless rectified, you have consented to the processing of your data also for commercial purposes.

Please note that the Data Subject's right to object, set out in the previous paragraph, against direct marketing purposes by email, calls without an operator or other automated means extends to the traditional ones, and that still remains the possibility for the Data Subject to exercise the right to object even in part.

Therefore, you can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication.

In any case, however, if you no longer wish to receive any promotional communication from Vaia, you can let us know by sending an email to the contact address listed on the site and we will delete your address from the archive.

The use of spam is completely foreign to the politics and ethics of Vaia.

NAVIGATION DATA

The computer systems and software procedures used to operate this *website* acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified interested parties, but by their very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of the computers used by users connected to the site, the *URI (Uniform Resource Identifier)* addresses 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 response, the numeric code indicating the *server* response status (successful, error, etc.) and other parameters related to the operating system and the user's IT environment.

This data is used only to obtain anonymous statistical information on site use and to check its correct functioning and are canceled immediately after processing. You can find more information on this, by consulting the Legal Disclaimer, in the devoted paragraphs "IP Addresses / Statistics" and "Adoption of Security Measures".

COOKIES

In compliance with current legislation, Vaia has chosen to provide a specific disclosure for the use of cookies. Please read it, so you can browse safely and consciously.

PROCESSING METHODS AND PURPOSES

Vaia Srl treats acquired data while guaranteeing their congruity, relevance to the purposes for which they have been collected, completeness, and their periodic updating. Vaia is committed to treat your data with the utmost confidentiality, with care and diligence, according to current provisions on the protection of personal

data.

In particular, we inform you that:

- a)** the treatment we intend to carry out with regard to the Data Subjects' personal data will consist in their collection, registration, organization, conservation, processing, modification, selection, extraction, comparison, use, interconnection, block, communication, dissemination, cancellation and destruction, as well as in the combination of two or more of these operations;
- b)** the processing of personal data will follow the purposes inherent to the Data Controller's business activities, in relation to the proposed products or to the environmental protection projects pursued by us;
- c)** the treatments listed above will be performed using both paper and information technology;
- d)** Vaia does not perform profiling and does not have an automated decision-making process. Vaia uses a plugin that will allow the extraction and collation of contact details and information from contact forms. These data will be acquired as provided by the user, without carrying out aggregations, breakdowns or other scoring or profiling procedures if not for internal statistical purposes;
- e)** Vaia uses direct marketing, lead generation and advertising techniques. If you want more information about it, you can contact the Data Controller at the reported contact details.

Personal data are processed with suitable tools (paper or automated) for the time strictly necessary to achieve the purposes for which they were collected.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

Vaia, for example, has implemented an antispam and anti-cheat plugin (Wordfence, from the WordPress repository), firewall and antivirus and uses the reCaptcha application against bots.

Vaia has taken all the minimum security measures required by law.

Furthermore, taking inspiration from the main international standards, it has adopted additional security measures to minimize risks related to the security, availability and integrity of collected and processed personal data.

TREATMENT OF SENSITIVE DATA

The forms loaded on the site by Vaia do not ask for any sensitive data.

In the event that, in the Become Partner Section, data is sent such as curriculum vitae and / or personal cards containing particular personal data or - pursuant to art. 9 and 10 EU Reg 2016/679 - data concerning the state of health, political, religious or union opinions, (i.e. adherence to movements or organizations of this nature), judicial data and data concerning racial or ethnic origins - and not bearing an explicit written consent to the processing of such data, Vaia will proceed to the immediate destruction of this document, so as not to incur in the penalties of law.

CHANGES TO THESE PRIVACY POLICIES

Vaia periodically checks its own privacy and security policies and, if necessary, revises them in relation to regulatory and / or organizational changes, or dictated by technology evolution. In the event of policy changes, the new version will be published on this site page.

QUESTIONS, CLAIMS AND SUGGESTIONS

Anyone interested in more information, or to contribute with their own suggestions or to make claims or disputes about the organization's privacy policies or about the ways in which Vaia processes personal data, it can do so by writing to the e-mail address published on the website.

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).