

Privacy Policy

The purpose of this document is to inform the natural person (hereinafter "**Data Subject**") about the processing of his/her personal data (hereinafter "**Personal Data**") collected by the data controller, Aita Pea Pea S.R.L., with registered office in Via Giuseppe Sacconi 4/b, Tax Code/VAT No. 16146721002, Aita Pea Pea SRL, e-mail address info@ciaovr.it, (hereinafter "**Data Controller**"), via and Clao - Piazza Navona experience (hereinafter "**Application**").

Changes and updates will be effective as soon as they are published on the Application. In case of non-acceptance of the changes made to the Privacy Policy, the Data Subject shall stop using this Application and may ask the Data Controller to delete his/her Personal Data.

1. Categories of Personal Data processed

The Data Controller processes the following types of Personal Data voluntarily provided by the Data Subject:

The Data Controller processes the following types of Personal Data collected automatically:

- **Usage Data:** such as, for example, pages visited, number of clicks, actions taken, duration of sessions, etc.

If the Data Subject decides not to provide Personal Data for which there is a legal or contractual obligation, or if such data is a necessary requirement for the conclusion of the contract with the Data Controller, it will be impossible for the Data Controller to establish or continue any relationship with the Data Subject.

The Data Subject who communicates Personal Data of third parties to the Data Controller is directly and exclusively liable for their origin, collection, processing, communication or divulgation.

2. Cookies and similar technologies

The Application uses cookies, web beacons, univocal identifiers and other similar technologies to collect the Data Subject's Personal Data on visited pages and links and other actions performed during the use of the Application. This data is stored and then used the next time the interested party browses the Application. The full Cookie Policy can be viewed at the following address: <http://www.ciaovr.it/cookie-policy>

3. Legal basis and purpose of data processing

The processing of Personal Data is necessary:

- a. for the performance of the contract with the Data Subject and especially:

1. **fulfillment of any obligation arising from the pre-contractual or contractual relationship with the Data Subject**
2. **registration and authentication of the Data Subject:** to allow the Data Subject to register in the Application, to access it and to be identified in it, also via external platforms
3. **support and contact with the Data Subject** to answer the Data Subject's requests

- b. for legal obligations and especially:

1. **the fulfilment of any obligation provided for by the applicable norms,** laws and regulations, in particular, on tax and fiscal matters

The Data Subject's Personal Data may also be used by the Data Controller to protect itself in judicial proceedings before the competent courts.

4. Data processing methods and receivers of Personal Data

The processing of Personal Data is performed via paper-based and computer tools with methods of organization and logics strictly related to the specified purposes and through the adoption of appropriate security measures.

Personal Data are processed exclusively by:

- persons authorized by the Data Controller to process Personal Data who have committed themselves to confidentiality or have an appropriate legal obligation of confidentiality;
- subjects that operate independently as separate data controllers or by subjects designated as data processors by the Data Controller in order to carry out all the processing activities necessary to pursue the purposes set out in this policy (for example, business partners, consultants, IT companies, service providers, hosting providers);
- subjects or bodies to whom it is mandatory to communicate Personal Data by law or by order of the authorities.

The subjects listed above are required to use appropriate measures and guarantees to protect Personal Data and may only access data necessary to perform their duties.

Personal Data will not be indiscriminately shared in any way.

5. Place

Personal Data will not be transferred outside the territory of the European Economic Area (EEA).

6. Fully automated decision-making processes

The Data Controller uses fully automated decision-making processes that may produce legal effects or have a significant impact on the Data Subject and that operate according to these criteria: Privacy .

7. Personal Data storage period

Personal Data will be stored for the period of time that is required to fulfill the purposes for which it was collected. In particular:

- for purposes related to the execution of the contract between the Data Controller and the Data Subject, will be stored for the entire duration of the contractual relationship and, after termination, for the ordinary prescription period of 10 years. In the event of legal disputes, for the entire duration of such disputes, until the time limit for appeals has expired
- for purposes related to legitimate interests of the Data Controller, they will be stored until the fulfilment of such interest
- in compliance with legal obligations, by order of an authority and for legal protection, they shall be stored according to the relevant timeframes provided for by such obligations, regulations and, in any case, until the expiry of the prescriptive term provided for by the rules in force
- for purposes based on the consent of the Data Subject, they will be stored until the consent is revoked

At the end of the conservation period, all Personal Data will be deleted or stored in a form that does not allow the identification of the Data Subject.

8. Rights of the Data Subject

Data Subjects may exercise specific rights regarding the Personal Data processed by the Data Controller. In particular, the Data Subject has the right to:

- be informed about the processing of their Personal Data
- withdraw consent at any time
- restrict the processing of his or her Personal Data
- object to the processing of their Personal Data
- access their Personal Data
- verify and request the rectification of their Personal Data
- restrict the processing of their Personal Data
- obtain the erasure of their Personal Data
- transfer their Personal Data to another data controller
- file a complaint with the Personal Data protection supervisory authority and/or take legal action.

In order to use their rights, Data Subjects may send a request to the following e-mail address info@ciaovr.it. Requests will be immediately treated by the Data Controller and processed as soon as possible, in any case within 30 days.

Last update: 18/01/2022