

# Privacy disclaimer

## The protection of your privacy is one of our main objectives.

Arka Service srl. with registered office in Turin, Corso Matteotti 42 (hereinafter "Arka Service srl") is constantly committed to protect the online privacy of its users. This document will allow you to know our privacy policy to understand how your personal information is handled when using the services on our website and to allow you, where appropriate, to give consent to the processing of your personal data expressed and aware in the sections of the site where it is requested to provide personal data.

We remind you that in the various sections of the websites Arka Service srl (hereinafter "Website") where we collect your personal data, specific information is published pursuant to art. 13 of EU Regulation 2016/679 (hereafter: "Regulation") for its necessary inspection before the provision of the requested data.

According to the rules of the Regulations, the treatments carried out by Arka Service srl will be based on the principles of lawfulness, correctness, transparency, limitation of the purposes and of the conservation, minimization of data, accuracy, integrity and confidentiality.

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## 1. Process Owner & Data Protection Officer

The Owner of the processing carried out through the Website is Arka Service srl as specified above. The owner's structure has a data protection officer (DPO). The DPO is available for information concerning the processing of personal data of Arka Service srl, including the list of data processors.

You can contact the DPO by writing to: [responsabileprotezionedati@arka-service.it](mailto:responsabileprotezionedati@arka-service.it)

## 2. Personal data subject to processing

For processing personal data we mean any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.

We inform you that the personal data processed will be constituted - also depending on your decisions on how to use the Services - by an identifier such as the name, the email address, an identification number, location data, an online ID, the purchases made, and other data suitable to make it identifiable or identifiable, depending on the type of Services requested (hereinafter only "Personal Data"). In particular, the Personal Data processed through the Website are as follows:

### Navigation data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified interested parties, but which 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 who connect to the Site, the addresses in the Uniform Resource Identifier (URI) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (success, error, etc.) and other parameters related to the operating system and the user's computer environment.

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Site and the sites of our customers and to check its correct functioning, to identify anomalies and / or abuse, and are deleted immediately after processing.

The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site or third parties.

### Cookie: Definitions, characteristics and application of the legislation.

Cookies are small text files that the sites visited by the user send and record on his computer or mobile device, to be then re-transmitted to the same sites at the next visit. Thanks to cookies, a site remembers the user's actions and preferences (such as login data, the chosen language, font size, other display settings, etc.) so that they do not have to be re-indicated when the user returns to visit said site or browse from one page to another. Cookies, therefore, are used to perform computer authentication, monitoring sessions and storing information regarding the activities of users accessing a site and may also contain a unique identification code that allows you to track the user's navigation inside of the site itself for statistical or advertising purposes. There are various types of cookies, depending on their characteristics and functions, and these can remain in the user's computer or mobile device for different periods of time:

- s.c. session cookies, which are automatically deleted when the browser is closed;
- s.c. persistent cookies, which remain on the user's equipment until a pre-established expiry date.

According to the legislation in force in Italy, the user's express consent is not always required for the use of cookies. In particular, "technical cookies", i.e. those used for the sole purpose of transmitting a communication over an electronic communications network, or to the extent strictly necessary to provide a service explicitly requested by the user, do not require such consent. In other words, these are cookies that are essential for the operation of the site or necessary to perform activities requested by the user.

Among technical cookies, which do not require an express consent for their use, the Italian Data Protection Authority (see Determination of the simplified procedures for information and the acquisition of consent for the use of cookies 'May 8, 2014, hereinafter only "Ruling") also includes:

- "cookie analytics" when used directly by the site operator to collect information, in aggregate form, on the number of users and how they visit the site,
- browsing or session cookies (to authenticate),
- functionality cookies, which allow the user to navigate according to a series of selected criteria (for example, the language, the products selected for purchase) to improve the service provided.

For "profiling cookies", vice versa, i.e. those aimed at creating profiles related to the user and used to send advertising messages in line with the preferences expressed by the same in the context of surfing the net, a prior consent of the user is required.

The Website uses the following cookies that can be de-selected, except for third-party cookies for which you must refer directly to the relative methods of selection and de-selection of the respective cookies, indicated by means of links:

- Technical cookies - navigation or session and strictly necessary for the operation of the Site or to allow the user to take advantage of the contents and services requested by them.
- Analytics cookies, which allow us to understand how the site is used by users. With these cookies we do not collect information about the user's identity or any personal data. The information is treated in aggregate and anonymous form.
- Functionality cookies, that is used to activate specific functions of the Site and a series of selected criteria (for example, the language, the products selected for purchase) to improve the service rendered.
- Profiling cookies used to send advertising messages in line with the preferences expressed by the user in the context of surfing the net.

### 3. Purpose of processing

The treatment we intend to carry out, with its specific consent where necessary, has the following purposes:

- a) Allow the provision of the Services requested by you and the subsequent and independent management of its control panel, which will be accessed through the delivery by Arka Service srl of the access credentials, which will enable the Services and make communications related to carry out any relationship established;
- b) allow navigation and consultation of the Arka Service srl website;

- c) respond to requests for assistance or information, which we will receive via e-mail, telephone or chat through the "Contact Us" page of our Website.
- d) comply with legal, accounting and tax obligations;
- e) carry out direct marketing via e-mail for services similar to those signed by you, unless you have opposed this treatment initially or during subsequent communications, for the pursuit of the legitimate interest of Arka Service srl to promote products or services you may reasonably be interested in;
- f) to elaborate studies, researches, market statistics; send advertising material, information, commercial information or surveys to improve the service ("customer satisfaction") via e-mail or text message, and / or through the use of the telephone with operator and / or through the official pages of Arka Service srl on social networks.

## 4. Legal bases and mandatory optional nature of the processing

The legal basis of the processing of Personal Data for the purposes set out in Section 3 (a-b-c) is art. 6 (1) (b) of the Regulation as the processing is necessary for the provision of the contracted services. The provision of Personal Data for these purposes is optional but failure to provide it would make it impossible to activate the required Services.

The purpose of section 3 (d) represents a legitimate processing of Personal Data pursuant to art. 6 (1) (c) of the Rules.

The processing performed for marketing purposes described in section 3 (e-f) is based on the release of your consent pursuant to art. 6 (1) (a) of the Rules. The provision of your Personal Data for these purposes is entirely optional and does not affect the use of the Services. The treatments referred to in section 3 (e), carried out for the purpose of e-mail marketing on products or services similar to those purchased by you, find instead its legal basis, pursuant to art. 6.1.f of the Regulations, in the legitimate interest of Arka Service srl to promote its products or services in a context in which the interested party can reasonably expect this type of treatment, to which he can also oppose at any time. In fact, if you wish to oppose the processing of your data for marketing purposes, referred to in sections 3 (e) and 3 (f), you can at any time by sending a request from the link proposed in the footer of commercial emails.

## 5. Recipients of personal data

Your personal data may be disclosed to third parties known to us only and exclusively for the aforementioned purposes and, in particular, to the following categories of subjects:

- a) External companies that perform services on our behalf;
- b) Entities and Public Administrations for legal obligations;
- c) Professionals who can be of support in the fulfillment of the law.

These subjects will process personal data as external managers.

## 6. Data retention

Pursuant to art. 5 of EU Regulation 679/2016, "Principles applicable to the processing of personal data", personal data are stored in a form that allows identification of data subjects for a period of time not exceeding the achievement of the purposes for which they are processed.



The personal data of the data subjects may also be kept for longer periods in compliance with the legal requirements in force (by way of example regarding accounting) and, in any case, by applying any technical-organizational measures suitable to activate mechanisms - where possible - of anonymization of the data.

Further information about the data retention period and the criteria used to determine this period can be requested by writing to the Data Controller or the DPO.

## 7. Interested parties rights

Pursuant to the current legislation, the interested party may assert his rights to the Data Controller, as expressed in EU Regulation 679/2016, in particular:

- a) the right of access to data (Article 5 of Regulation 679/2016)
- b) right of rectification (Article 16 of Regulation 679/2016)
- c) right to cancellation (Article 17 of Regulation 679/2016)
- d) right to limit the processing (Article 18 of Regulation 679/2016)
- e) the right to data portability (Article 20 of Regulation 679/2016)

## 8. Changes

This privacy policy is effective from 25 May 2018.

Arka Service srl reserves the right to modify or simply update its content, in part or completely, also due to changes in the applicable legislation. If the modifications to this Policy regard substantial changes in the treatments or may have a significant impact on the interested parties anyway, Arka Service srl will take care to properly notify the interested parties.