

# Privacy Policy

## Your privacy.

Poli.com S.r.l. having its registered office in Via Caduti di Marcinelle n.11, Milan, Italy, VAT No. 06862680961, registered with the Companies' Register of Milan under No. MI-1920703 (hereinafter, "**Poli.com**") is constantly committed to protecting your privacy. This document was drafted pursuant to article 13 of the EU Regulation 2016/679 (hereinafter, the "**Regulation**") in order to allow you to know how your personal information is handled when you browse the website [www.policomsrl.it](http://www.policomsrl.it) (the "**Site**") and, if applicable, to give your express and informed consent to the processing of your personal data.

If you want to know more about how Poli.com handles your personal data please also read our "Policy Statement", which contains information on: (i) our use of cookies; and (ii) the terms and conditions of our services.

## The data controller.

The Data Controller of your personal data is Poli.com S.r.l. with registered office at Via Caduti di Marcinelle n.11, Milan, Italy, VAT no. 06862680961, registered with the Companies' Register of Milan under no. MI-1920703. You may contact the Data Controller at any time by submitting a request to [info@policomsrl.it](mailto:info@policomsrl.it) or by contacting the latter directly on +39 0965 641607 for any clarification, question or requirement related to your privacy and the processing of your personal data.

## Types of data processed and purposes of processing.

Poli.com processes the personal data you provide when you place an order and purchase products and the data it collects while you are browsing or using the services offered on the Site.

## Poli.com can therefore collect data about you such as:

- *registration data*: your personal data such as name and surname, date of birth, residence, telephone number, email address, tax code, VAT number; you can view and modify any personal data in your profile;
- *payment information*: payment information is acquired, in encrypted format and according to adequate security requirements. Poli.com does not store your credit card details and under no circumstances are these details stored on Poli.com's servers;
- *additional information shared by the User*: information that you may provide for other purposes: for example, your billing address if you intend to receive invoices from Poli.com;
- *browsing data*: IP address, login information, browser type and version, browser plug-in types and versions, operating system and platform, navigation information including URL clickstream to/from the Site;
- *purchasing data*: data on your purchasing habits concerning our products;
- *Information about communications with Poli.com*: we process the personal data you provide us with in order to answer your questions or when you contact our staff to assist you. If you do not wish to receive further communications from Poli.com or if you want to change your consent, you can let us know by simply contacting our staff at [info@policomsrl.it](mailto:info@policomsrl.it).

Regarding all of the aforementioned activities, we will process your personal data mainly by IT and electronic tools; the tools we use guarantee high standards of security, in full compliance with current legislation.

**Your personal data are processed for the following purposes.**

We will only process your data if there is a reason to do so, and only if that reason is permitted by data protection legislation. We will be entitled to process your information if: we need to process your information in order to provide you with the services you have requested or to enter into a contract; we have your consent; we have a legitimate interest in processing your data; or we have a legal obligation to do so.

Should we need to process your data in order to provide you with the service you have requested or to engage in a contract, we will use your information to:

- (a) to respond to a pre-contractual request for contact or information sent via the appropriate section.  
*Legal basis:* pre-contractual measures (Art. 6.1.b of the GDPR).  
*Retention:* maximum 12 months after termination of the service for internal management and organisational purposes;
- (b) to register on this Site and to access its private area.  
*Legal basis:* delivery of requested services (Art. 6.1.b of the GDPR).  
*Retention:* for up to 2 years after your last use of the Site, or until you delete your account;
- (c) for the finalisation and processing of purchase orders, and activities related to the same, their invoicing and subsequent after-sales service.  
*Legal basis:* delivery of requested services (Art. 6.1.b of the GDPR);  
*Retention:* up to 10 years after completion in order to fulfil obligations under current tax and fiscal regulations;
- (d) to send commercial communications, to optimise the user experience on the basis of previous purchases and to get access to offers related to these purchases, via e-mail.  
*Legal basis:* specific consent ( Art. 6.1.a of the GDPR) and, for those who have completed at least one purchase on the Site, legitimate interest (Art. 6.1.a of the GDPR and Art. 130.4 of Legislative Decree 196/03);  
*Retention:* up to 2 years after the last use of the Site and, in any case, until the revocation of the consent granted;
- (e) for purposes related to the navigation and management of this Site, namely: (i) to protect the security of the Site or its users and to prevent or detect fraud or abuse to the detriment of the Site or Poli.com itself; (ii) to verify and ensure the proper operability of the Site and its functions also through third parties; (iii) to collect access and navigation statistics, to improve the services and the use of the Site (through logs and technical/analytical cookies also from third parties).  
*Legal basis:* the provision of the Site's browsing service, the legitimate interest of the Controller as well as the obligations provided for by the legislation ( Art. 6.1.b/c/f of the GDPR).  
*Retention:* up to 12 months after the registered event (unless the Judicial Authorities need to establish criminal offences).

## **Provision of data.**

The provision of data for the purposes referred to in letters (a), (b), (c) and (d) above is to be considered optional; however, without some of the aforementioned data it will not be possible to complete registration on the Site or respond to any requests for information.

The provision of data for the purpose referred to in letter (e) above is to be considered mandatory, otherwise it will not be possible to provide access or navigation to the Site.

The interested party is always entitled to revoke any consent given. Such revocation will not affect the lawfulness of the processing based on the consent before revocation.

## **Entities qualified to process your data.**

Your personal data is processed by Poli.com's trained and instructed staff in its capacity as data controller. Your data may also be processed by subjects other than Poli.com, in compliance with applicable laws. Poli.com warrants that its technicians, suppliers or independent third parties who are contractually bound to Poli.com will follow Poli.com's instructions when processing the information they share..

## **Transfer of personal data.**

In addition, your data may be shared with:

- persons, companies or professional firms providing accounting, administrative, legal, tax and financial assistance and advice to Poli.com; persons with whom we need to interact in order to provide our services and/or operate the Site (e.g. hosting providers, payment processors, persons in charge of technical maintenance of the Site and/or the servers where your data is stored, persons in charge of collecting and delivering products);
- persons, entities or authorities to whom we are required to disclose your data by law or by order of the authorities;
- persons authorised by Poli.com to process personal data in order to carry out activities strictly related to the provision of our services, who have committed themselves to confidentiality or are under an appropriate legal obligation of confidentiality ( collectively hereinafter referred to as the "**Recipients**").

Your personal data is stored on servers and processed by Poli.com within the European Economic Area. Poli.com ensures that your data is processed by these recipients in accordance with the Regulations.

## **Your rights.**

Pursuant to articles 15 et seq. of the Regulation, you have the right to ask Poli.com, at any time, to access your personal data collected, to rectify or erase it or to object to its processing, you have the right to request the restriction of processing in the cases provided for by article 18 of the Regulation, as well as to obtain in a structured, commonly used and machine-readable format the data concerning you, in the cases provided for by article 20 of the Regulation.

Requests are to be addressed by writing to the following address: *info@policom srl.it*.

Specifically, your rights consist of:

- **right to be informed.** You have the right to receive clear, transparent and easily understandable information about how we use your information and about your rights. This is why we provide you with information through this document;
- **right to access.** You have the right to obtain access to your information (if we are processing it). This will allow you, for example, to check that we are using your information in accordance with data protection legislation. If you would like to access the information we hold about you in this way, please get in touch with us;
- **right to rectification.** You have the right to correct your information if it is inaccurate or incomplete. You can ask us to correct any errors in the information we hold about you by contacting us;
- **right to erasure.** This is also known as the 'right to be forgotten' and, in simple terms, allows you to request the deletion or removal of certain information about you by contacting us. This right is not absolute and only applies in certain circumstances;
- **right to restriction of processing.** You have the right to 'block' or 'suppress' further use of your information. When data processing is restricted, we may still retain your information, but not use it further;
- **right to data portability.** You have the right to obtain your personal information in an accessible and transferable format so that you can reuse it for your own purposes with different service providers. This is not a general right, however, and there are exceptions. Please contact us for more information;
- **right to lodge a complaint.** You have the right to lodge a complaint about the way we handle or process your information with the competent data protection authority (see section "Complaints");
- **right to withdraw consent.** If you have given your consent to anything we do with your information (i.e. if we use consent as a legal basis for processing certain information), you have the right to withdraw that consent at any time. You can do this by contacting us. Withdrawing consent will not, however, make it unlawful for us to use your information for the period during which your consent was evident;
- **right to object to processing.** You have the right to raise an objection to certain types of processing, including processing for direct marketing and profiling purposes. You can object by changing your marketing settings, disabling cookies, or contacting us.

## Complaints.

If you think that your personal data has been processed unlawfully, you can lodge a complaint with one of the competent data protection supervisory authorities. In Italy, a complaint may be lodged, pursuant to Article 77 of the Regulation, with the Garante per la Protezione dei Dati Personali (the Italian Data Protection Authority).

More information on how to submit a complaint is available on the Garante's website at <http://www.garanteprivacy.it>.

## Security measures.

Your personal data are processed with specific technical and organisational security measures to prevent unlawful or fraudulent use. In particular, we use security measures that guarantee: the pseudonymisation and/or encryption of your data, the confidentiality, integrity and availability of your data. Moreover, Poli.com is committed to regularly testing, verifying and evaluating the effectiveness of technical and organisational measures in order to ensure continuous improvement in data processing security.

**Policy updates.**

This privacy policy may be amended and supplemented over time. We encourage you to periodically check its contents and, where possible, we will endeavour to inform you of changes and their consequences.

Last updated: **28 February 2022**