

Privacy Policy of the Agromart Group

This Application collects some Personal Data from its Users.

This document can be printed for reference by using the print command in the settings of any browser.

Policy summary

Personal Data processed for the following purposes and using the following services:

- - **Advertising**
 - **Google Ad Manager and Google AdSense**
Personal Data: Trackers; Usage Data
 - **Analytics**
 - **Google Analytics (Universal Analytics) and Google Analytics (Universal Analytics) with anonymized IP**
Personal Data: Trackers; Usage Data
 - **Google Analytics 4**
Personal Data: browser information; city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data
 - **Contacting the User**
 - **Contact form**
Personal Data: city; company name; country; county; date of birth; email address; fax number; field of activity; first name; gender; last name; number of employees; phone number; physical address; profession; state; Tax ID;

Trackers; Usage Data; User ID; various types of Data; VAT Number; website; ZIP/Postal code

- **Mailing list or newsletter**

Personal Data: city; company name; country; county; date of birth; email address; first name; gender; last name; phone number; physical address; profession; state; Trackers; Usage Data; website; ZIP/Postal code

- **Displaying content from external platforms**

- **Google Fonts and Google Maps widget**

Personal Data: Trackers; Usage Data

- **Interaction with external social networks and platforms**

- **Facebook Like button and social widgets and Twitter Tweet button and social widgets**

Personal Data: Trackers; Usage Data

- **Registration and authentication provided directly by this Application**

- **Direct registration**

Personal Data: academic background; billing address; budget; city; company name; country; county; date of birth; email address; fax number; field of activity; first name; gender; house number; language; last name; number of employees; password; phone number; physical address; picture; prefix ; profession; profile picture; Social Security number (SSN); state; Tax ID; Trackers; Twitter handle; Usage Data; User ID; username; various types of Data; VAT Number; website

- **SPAM protection**

- **Google reCAPTCHA**

Personal Data: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data

- **Tag Management**

- **Google Tag Manager**

Personal Data: Trackers; Usage Data

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may follow the instructions provided by [YourOnlineChoices](#) (EU), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar initiatives. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

Users may also opt out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

Further information about the processing of Personal Data

- - **Selling goods and services online**

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery.

The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Application depends on the payment system used.

Contact information

- - **Owner and Data Controller**

The Agromart Group
17554 Plover Mills Road

Thorndale, ON N0M 2P0
[1-519-461-9057](tel:1-519-461-9057)

Owner contact email: info@agromartgroup.com

Full policy

Owner and Data Controller

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Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Trackers; Usage Data; number of Users; city; device information; session statistics; latitude (of city); longitude (of city); browser information; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; first name; last name; gender; date of birth; phone number; VAT Number; company name; profession; physical address; fax number; country; state; county; email address; ZIP/Postal code; various types of Data; Tax ID; field of activity; User ID; number of employees; website; username; password; Social Security number (SSN); picture; prefix ; profile picture; budget; academic background; Twitter handle; billing address; house number; language.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Advertising, Analytics, Displaying content from external platforms, SPAM protection, Tag Management, Contacting the User, Registration and authentication provided directly by this Application and Interaction with external social networks and platforms.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- Advertising

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Application, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Google Ad Manager

Google Ad Manager is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with.

In order to understand Google's use of Data, consult [Google's partner policy](#).

This service uses the "DoubleClick" Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: [Google Ad Settings](#).

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Google AdSense

Google AdSense is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. This service uses the “DoubleClick” Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: [Google Ad Settings](#).

In order to understand Google’s use of data, consult [Google’s partner policy](#).

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy – Opt Out](#); Ireland – [Privacy Policy – Opt Out](#).

- Analytics

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Universal Analytics)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In order to understand Google’s use of Data, consult [Google’s partner policy](#).

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy – Opt Out](#); Ireland – [Privacy Policy – Opt Out](#).

Google Analytics 4

Google Analytics 4 is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, (“Google”). Google

utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google's official documentation](#).

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: browser information; city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy – Opt Out](#); Ireland – [Privacy Policy – Opt Out](#).

Google Analytics (Universal Analytics) with anonymized IP

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy – Opt Out](#); Ireland – [Privacy Policy – Opt Out](#).

- Contacting the User

Contacting the User

Contact form (this Application)

By filling in the contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: city; company name; country; county; date of birth; email address; fax number; field of activity; first name; gender; last name; number of employees; phone number; physical address; profession; state; Tax ID; Trackers; Usage Data; User ID; various types of Data; VAT Number; website; ZIP/Postal code.

Mailing list or newsletter (this Application)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data processed: city; company name; country; county; date of birth; email address; first name; gender; last name; phone number; physical address; profession; state; Trackers; Usage Data; website; ZIP/Postal code.

- Displaying content from external platforms

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Fonts

Google Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Google Maps widget

Google Maps is a maps visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

- Interaction with external social networks and platforms

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.

The interaction and information obtained through this Application are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to log out from the respective services in order to make sure that the processed data on this Application isn't being connected back to the User's profile.

Facebook Like button and social widgets

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing,

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by X Corp.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

- Registration and authentication provided directly by this Application

Registration and authentication provided directly by this Application

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

Direct registration (this Application)

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data processed: academic background; billing address; budget; city; company name; country; county; date of birth; email address; fax number; field of activity; first name; gender; house number; language; last name; number of employees; password; phone number; physical address; picture; prefix ; profession; profile picture; Social Security number (SSN); state; Tax ID; Trackers; Twitter handle; Usage Data; User ID; username; various types of Data; VAT Number; website.

- SPAM protection

SPAM protection

This type of service analyzes the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

Google reCAPTCHA

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

- Tag Management

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Privacy Policy Rebate Program

The Agromart Group (we will refer to it as “**Agromart**”) values your privacy and is committed to protecting your personal information.

This Policy describes how we collect, use, share, and protect your personal information when you visit our website www.agromartgroup.com and when you visit our stores in Ontario. It also explains how you can exercise your privacy rights, for example, to access or correct your personal information.

When you provide personal information according to this Policy, we assume that you agree that this information will be treated as described in this Policy.

- **What is personal information?**

Personal information means any information that can identify a natural person, directly or indirectly. For example, your name, address, telephone number, date of birth, IP address, browsing activities, purchase history and credit card number can be considered personal information.

Information about a business is generally not considered personal information.

- **What does this Policy cover?**

This Policy applies to the personal information of individuals who interact with us via our website or when visiting our stores in Ontario.

- **How do we collect your personal information?**

We collect your personal information when you

- provide us with personal information on our website, including by browsing on our website
- communicate with us through various means, such as email, telephone, via certain forms or in person.
- make transactions with an Agromart (informations are extracted from invoices)

- **What personal information do we collect and why?**

What type of information do we collect or create?	Why do we need it?
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Transaction related

- | | |
|---|--|
| <ul style="list-style-type: none"> • Transactional data: information related to a transaction, such as payment information and purchased products • Client Tag: a client number is created and associated with your account • Aggregate data on your purchase history • Contact information: first name; last name, phone number, address and email address | <ul style="list-style-type: none"> • To allow you to make your purchase and process your payment • To manage rebate programs with our partners and allow us to provide you with discounts, rebates or other privileges ; and to provide our partners reports to allow them to evaluate your eligibility to the rebate programs and make the appropriate payments (see the To whom do we share your personal information? section). • If you wish to withdraw your consent to participate in the rebate program, please contact your Agromart. • To perform market analysis |
|---|--|

On our website

- | | |
|---|--|
| <ul style="list-style-type: none"> • Login information • Contact information: first name; last name, phone number, address and email address • Usage data, such as the number of users, city, device information; session statistics, latitude (of city), longitude (of city), browser information, answers to questions, clicks, etc. | <ul style="list-style-type: none"> • To authenticate you • To contact you • To provide you with the requested product or service or answer your request. • For the purposes described in our Cookie Policy |
|---|--|

In general, we may also use your personal information to comply with applicable laws and fulfill our regulatory obligations, to process product complaints, to maintain our security systems and to protect our rights and the rights of others.

- **How do we obtain your consent?**

How we obtain your consent (i.e. how we obtain it) depends on the circumstances. Sometimes we ask for your explicit consent. However, consent may also be implied, i.e. it is inferred from the circumstances or from your silence.

If you provide us with personal information about another person, you are responsible for obtaining that person's consent.

- **To whom do we share your personal information?**

We may share your personal information with other organizations, such as our partners or service providers, for the purposes listed in the **What personal information do we collect and why?** section.

In such cases, we will endeavour to protect the personal information communicated by means of written agreements and undertakings, requiring them in particular to adopt good practices and security measures in line with our expectations.

Third party category	What they do for us
Service Providers (and their own service providers)	<p>We may engage service providers to perform services <u>on our behalf</u>. Categories of service providers accessing or processing your personal information include those engaged to</p> <ul style="list-style-type: none"> • Provide analytics services (e.g. Google analytics) – consult our Cookie Policy • Display content from external platforms (e.g. Google Fonts) • Interact with external social networks and platforms (e.g. Twitter Tweet button and social widgets, by X Corp.) • Hosting and platform services, such as user registration services (e.g. WordPress.com) • SPAM protection services (e.g. Google reCAPTCHA) • Tag management services, to manage tags or scripts on our website (e.g. Google Tag Manager) • Traffic optimization and distribution (e.g. Cloudflare)
Partners involved in the management of rebate programs	<p>As a retailer, Agromart has a privileged relationship with its customers.</p> <p>As a result, we participate in the management of certain rebate programs, with certain manufacturers (and their service providers). We may generate data based on your consumption of certain products and share it with third parties that help us perform market analysis, manage the programs, such as our affiliated company Développement Tangara Inc. Tangara helps us creating reports and determining your eligibility and qualification for payment based on your transactions at Agromart.</p> <p>The reports generated by Tangara may also be shared with the manufacturers, to allow them to manage their rebate program and to perform market analysis. For instance, reports may be shared to allow them to pay rebates to eligible customers.</p>

Affiliated entities

We may share your personal information with our affiliates or shareholders, in an aggregate, de-identified or anonymous form, to answer a specific request and solely if necessary to manage our corporate affairs.

Others, when authorized by law

From time to time, we may be asked to provide personal information by certain organizations that do not act on our behalf, but are authorized to request it.

We only disclose the information when authorized to do so by law, regulation, court order, subpoena, valid demand or search warrant, or in response to a government investigation or other lawful request.

- **How long do we keep your personal information?**

We will keep your personal information as long as necessary to fulfill the purposes indicated in this Policy, unless the law or an exceptional situation requires us to keep it longer. This could be the case, for example, in the event of litigation.

- **Where do we keep your personal information?**

We store your personal information on several servers and platforms in Canada.

If we disclose personal information outside of Canada, where privacy laws may differ, we will ensure that your information receives an adequate protection, for example through contractual measures. While such information is outside of your province or country of residence, it may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

- **How do we protect your personal information?**

Only those employees who need to process your personal information to perform their duties have access to it. They have access only to the information they need to perform their duties.

We have implemented several types of measures to protect your personal information against loss, theft and any unauthorized access, use or disclosure. These include

- physical measures, such as locked premises
- technological measures, such as firewalls
- organizational measures

That said, no security measure is absolute or fully guaranteed. If you have reasons to believe that your interaction with us is no longer secure (for example, if you believe that the information you have provided to us has been compromised), please contact us immediately at the address listed in the **How can you get in touch?** section.

- **What are your privacy rights?**

Accessing, correcting or deleting your information	Withdraw your consent
<p>You may access the personal information we hold about you and obtain a copy of it.</p> <p>You can request that we correct errors or omissions regarding your personal information. If you demonstrate the inaccuracy, ambiguity or incompleteness of your personal information as found in our files, we will modify them.</p>	<p>You may also withdraw your consent at any time, subject to a reasonable notice.</p> <p>How this request is handled depends on the situation and the purpose for which it is made. Depending on the situation:</p> <ul style="list-style-type: none">• you may be able to withdraw your consent, but we will no longer be able to offer a product or service or rebate that depends on it. Otherwise, we will inform you of the consequences of your request in our response.• you will not be able to withdraw your consent because the processing of your personal information is necessary or mandatory <p>In all cases, we may be required to retain certain personal information to comply with our legal or contractual obligations.</p>

To exercise your rights, please make a written request to our Privacy Officer using the contact details provided in the **How can you get in touch?** section. We may ask you for identification to verify your identity.

To learn more about your rights under Canadian laws, please visit the following [link](#).

- **How can you get in touch?**

You may direct any requests, questions, complaints or comments regarding this Policy or our privacy practices to our Privacy Officer at

Privacy Officer

Agromart Group

17554 Plover Mills Road

Thorndale, ON N0M 2P0

Privacyofficer@sollio.ag

- **Will we update this Policy?**

This Policy is effective as of the update date shown at the bottom of the page.

If we make material changes to this Policy, we will notify you on our site. The changes will take effect at the time of publication of the Policy or any other date indicated in the Policy.

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may follow the instructions provided by [YourOnlineChoices](#) (EU), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar initiatives. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

Users may also opt out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

Further information about the processing of Personal Data

- Selling goods and services online

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery.

The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Application depends on the payment system used.

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this

proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or – as far as technically and legally feasible – sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser. [Cookie Policy](#)

Tracker

Tracker indicates any technology – e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting – that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy policy relates solely to this Application, if not stated otherwise within this document.

Latest update: January 20th, 2025