

# **Information on the processing of personal data pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR). In force since 1/1/2022**

## **PREMISE**

This information takes into account the provisions of the GDPR and the Privacy Code (Legislative Decree 30 June 2003 n. 196). The document was also drawn up on the basis of the Guidelines of the Privacy Guarantor (especially the Anti-spam Guidelines issued by the Privacy Guarantor on 4 July 2013).

Data Controller: Romeo and Juliet, Via Bosa 13, 36020 Pove del Grappa (VI), Italy. Tel. +39 351 7928181 | [giuliettaeromeo16@gmail.com](mailto:giuliettaeromeo16@gmail.com)

Site to which this privacy policy refers: [www.giuliettaeromeo.info](http://www.giuliettaeromeo.info) (Website).

The Data Controller has not appointed a DPO (Data Protection Officer). Therefore, you can send any request for information directly to the Data Controller.

## **GENERAL INFORMATIONS**

This document describes how the Data Controller processes your personal data provided on the Site.

The main treatments of your personal data are described below. In particular, the legal basis of the processing is explained, if the provision is mandatory and the consequences of failure to provide personal data. To better describe your rights, if necessary, we have specified if and when a certain processing of personal data is not carried out.

### **Registration on the Site**

The Site does not offer the possibility of registration. Therefore, the Data Controller does not process your personal data for this purpose.

### **Purchases on the Site**

It is not possible to make purchases on the Site. Therefore, your personal data will not be processed for this purpose.

The Data Controller does not process the user's data to send "reminder" emails for the purchase of products and / or services of the Data Controller.

### **Respond to your requests**

Your data will be processed to respond to your requests for information. The provision is optional, but your refusal will make it impossible for the Data Controller to answer your questions. The legal basis of the processing is the legitimate interest of the Data Controller to follow up on the user's requests. This legitimate interest is equivalent to the user's interest in receiving a response to communications sent to the Data Controller.

### **Generic marketing**

The Data Controller will not send you advertising material and / or newsletters relating to its own or third party products.

### **Profiling**

The Data Controller does not perform "profiling" with your personal data. Therefore, it will not send you advertising material and / or newsletters relating to its own products or those of third parties of your specific interest.

### **Data transfer**

The Data Controller does not transfer your personal data to third parties.

### **Geolocation**

The Site does not implement geolocation tools for the user's IP address.

### **Communication of personal data**

As part of its ordinary activity, the Data Controller may communicate your personal data to certain categories of subjects. In article 2. You can find the list of subjects to whom the Data Controller communicates your personal data. To facilitate the protection of your rights, Article 2 may specify in some cases when your data is not disclosed to third parties.

The "communication" of personal data to third parties is different from the "transfer" (governed by the previous point). In fact, in the communication, the third party to whom the data is transmitted can use it only for the specific purposes described in the relationship with the Data Controller. In the transfer, however, the third party becomes the owner of the autonomous treatment of personal data. Furthermore, your consent is always required to transfer your personal data to

third parties.

Without prejudice to the foregoing, it is understood that the Data Controller may in any case use your personal data to correctly fulfill the obligations established by the laws in force.

## **SPECIFIC PRIVACY POLICY**

### **Art. 1 Processing methods**

1.1 The processing of your personal data will mainly be carried out with the aid of electronic or automated means, in the manner and with the appropriate tools to ensure its security and confidentiality in accordance with the GDPR.

1.2 The information acquired and the methods of processing will be relevant and not excessive with respect to the type of services rendered. Your data will also be managed and protected in secure IT environments appropriate to the circumstances.

1.3 No "particular data" is processed through the Site. Particular data are those that can reveal racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade union nature, the state of health and sexual life.

1.4 Judicial data are not processed through the Site.

### **Art. 2 Communication of personal data**

The Data Controller may communicate your personal data to specific categories of subjects. The subjects to whom the Data Controller reserves the right to communicate your data are indicated below:

- The Data Controller may communicate your personal data to all those subjects (including Public Authorities) who have access to personal data by virtue of regulatory or administrative provisions.
- Your personal data may also be disclosed to all those public and / or private entities, natural and / or legal persons (legal, administrative and tax consultancy firms, Judicial Offices, Chambers of Commerce, Chambers and Labor Offices, etc. ), if the communication is necessary or functional for the correct fulfillment of the obligations deriving from the law.
- The Data Controller does not make use of employees and / or collaborators in any capacity. Therefore, your personal data will not be disclosed to this category of subjects.
- The Data Controller does not make use of companies, consultants or professionals in charge of installation, maintenance, updating and, in general, the management of the Data Controller's hardware and software. Therefore, your data will not be disclosed to these categories of subjects.
- The Data Controller does not use CRM platforms (companies that perform in particular the activity of sending automated communications to users). Therefore, your personal data is not disclosed to these companies.
- The Data Controller does not use external companies to provide the customer care service.

The Data Controller reserves the right to modify the aforementioned list based on its ordinary operations. Therefore, you are invited to regularly access this information to check which subjects the Data Controller communicates your personal data to.

### **Art. 3 Retention of personal data**

3.1 This article describes how long the Data Controller reserves the right to keep your personal data.

- As required by article 2220 of the civil code, invoices, as well as all accounting records in general, are kept for a minimum period of ten years from the date of registration, so that they can be presented in the event of a check.
- For the purpose of executing the sales contract, the data will be kept for 10 years from the date of receipt of the purchase order. This is to allow the Data Controller to exercise his right of defense and to demonstrate that he has correctly executed the contract.
- Your personal data will be kept only for the time necessary to guarantee the correct performance of the services offered through the Site.
- For marketing purposes, personal data will be stored until consent is revoked. For inactive users, personal data will be deleted one year after sending the last email possibly viewed.
- For customer care purposes, the data will be deleted once the assistance service is completed.

3.2 Without prejudice to the provisions of Article 3.1, the Data Controller may keep your personal data for the time required by specific regulations, as amended from time to time.

#### **Art. 4 Transfer of personal data**

4.1 The Data Controller is based within the European Union. Therefore, the processing of your data is safe from a regulatory point of view as it is governed by the GDPR. If the transfer of your personal data takes place in a non-EU country and for which the European Commission has expressed an adequacy judgment, the transfer is in any case considered safe from a regulatory point of view. This article 4.1 indicates from time to time the countries to which your personal data may possibly be transferred and where the European Commission has expressed an opinion of adequacy.

- The user is therefore invited to regularly access this article to check if the transfer of your personal data takes place in a country with these characteristics.

4.2 Without prejudice to the provisions of article 4.1, your data may also be transferred to non-EU countries and for which the European Commission has not expressed an adequacy judgment. You are therefore invited to regularly review this article 4.2 to ascertain to which of these countries your data may be transferred.

4.3 In this article, the Data Controller indicates the countries where it may specifically direct its business. This circumstance may imply the application of the legislation of the country of reference, together with that of the GDPR.

- At the request of the user, the Data Controller will apply to the processing of personal data any more favorable legislation provided for by the user's national legislation.

#### **Art. 5. Rights of the interested party**

Pursuant to art. 13 of the Privacy Regulation, the Data Controller informs you that you have the right to:

- ask the Data Controller to access your personal data and to correct or delete them or limit their processing or to oppose their processing, in addition to the right to data portability;
- withdraw the consent at any time without prejudice to the lawfulness of the treatment based on the consent given prior to the revocation;
- propose a complaint to a supervisory authority (eg: the Guarantor for the protection of personal data).

The above rights may be exercised with a request addressed without formalities to the contacts indicated in the Introduction.

#### **Art. 6. Amendments and Miscellaneous**

The Data Controller reserves the right to make changes to this information at any time, giving appropriate publicity to the users of the Site and guaranteeing in any case an adequate and similar protection of personal data. In order to view any changes, you are invited to regularly consult this information. In the event of substantial changes to this privacy statement, the Data Controller may also notify via email.