

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

Italian Wedding Experience is a project of Visionplus S.r.l., with headquarters in via S.M.Pelletier 4, 20900 Monza (MB), CF and VAT number 09309310960 (hereinafter, "Data Controller"), as data controller, informs you pursuant to art. 13 Legislative Decree 30.6.2003 n. 196 (hereinafter, "Privacy Code") and art. 13 EU Regulation no. 2016/679 (hereinafter, "GDPR") that your data will be processed in the following ways and for the following purposes:

### **1. Object of the processing**

The Data Controller processes personal, identifying and non-sensitive data (in particular, name, surname, email, telephone number - hereinafter, "personal data" or also "data") communicated by you during registration on the Data Controller's website.

The optional, explicit and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.

### **Browsing data**

The computer systems and software procedures used to operate this website 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 its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the addresses in URI (Uniform Resource Identifier) notation of the requested resources, the time of the request, the method used in submitting 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 (successful, error, etc.) and other parameters relating to the operating system and the user's IT environment. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site.

### **Cookies**

- What are cookies

They are small text files that the sites visited by a user send to his computer. The text stores information that the site is able to read when it is consulted again by the user.

Some cookies are necessary for the correct functioning of the site, while others are useful to the visitor because they make browsing the pages quicker and quicker. The advantage of having cookies installed on your computer is the speed of navigation, as you no longer need to provide the same information, for example, to access a site already visited previously.

The guarantor for the protection of personal data, with a provision of 8 May 2014 (published in the official gazette on 3 June 2014 at no. 126), distinguished cookies into two macro-categories.

- Technical cookies

Technical cookies are those used for the sole purpose of "carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide this service (see Art. 122, paragraph 1, of the code)".

They are not used for other purposes and are normally installed directly by the owner or manager of the website. They can be divided into navigation or session cookies, which guarantee normal navigation and use of the website. Analytics cookies, assimilated to technical cookies when used directly by the site manager to collect information, in aggregate form, on the number of users and how they visit the site itself.

Functionality cookies allow the user to navigate according to a series of selected criteria (for example the language) in order to improve the service provided.

- Profiling cookies

This site does not implement profiling cookies.

- Google analytics

This website uses Google Analytics, a web analysis service provided by Google. Google analytics uses cookies, which are text files that are placed on the user's computer, to allow the website to analyze how users use the site. The information generated by the cookie about the use of the website (including the IP address) is transmitted and stored on Google's servers.

Google will use this information for the purpose of tracking and examining the use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where this is required by law or where such third parties process the aforementioned information on behalf of Google.

Google will not associate the user's IP address with any other data held by Google. The user can deny consent to the use of cookies by selecting the dedicated setting on the browser.

By using this website, the user consents to the processing of data by Google for the methods and purposes indicated above.

To obtain complete information for this type of cookies you can directly refer to Google analytics

- Third party cookies

This site sometimes uses videos from YouTube and Vimeo, content from the social networks Twitter, Facebook, Google+ and in general, based on need, embeddable content from other platforms in a non-constant manner. Since we cannot control the cookies that these third-party sites serve, we recommend inquiring directly with each third party to have greater control over these cookies. Below are some useful links to the cookie policies of the third parties mentioned:

- Facebook <https://www.facebook.com/help/cookies/>
- Youtube <https://www.google.it/intl/it/policies/privacy/>
- Google+ <http://www.google.com/policies/technologies/types/>
- Vimeo [https://vimeo.com/cookie\\_policy](https://vimeo.com/cookie_policy)
- LinkedIn [https://www.linkedin.com/legal/cookie\\_policy](https://www.linkedin.com/legal/cookie_policy)

- Deny consent to the installation of cookies in various browsers

You can delete all cookies installed in your browser's cookie folder. Each browser has different procedures for managing settings. Click on one of the links below for specific instructions.

- Microsoft Windows Explorer
- Google Chrome
- Mozilla Firefox
- Apple Safari

## ***2. Purpose of the processing***

Your personal data is processed:

A) without your express consent (art. 24 letter a, b, c Privacy Code and art. 6 letter b, e GDPR), for the following Service Purposes: - allow us to contact you via email or telephone to provide you with the commercial information requested and any further Services requested by you;

- fulfill pre-contractual, contractual and tax obligations deriving from existing relationships with you;
- fulfill the obligations established by law, by a regulation, by community legislation or by an order from the Authority;
- prevent or discover fraudulent activities or abuses harmful to the website;
- exercise the rights of the Owner, for example the right of defense in court.

B) Only with your specific and distinct consent (articles 23 and 130 of the Privacy Code and article 7 of the GDPR), for the following Marketing Purposes:

- send you via email newsletters, commercial communications and/or advertising material on products or services offered by the Owner

We would like to inform you that if you are already our customer, we will be able to send you commercial communications relating to the Data Controller's services and products similar to those you have already used, unless you disagree (art. 130 c. 4 Privacy Code).

### **3. Treatment methods**

The processing of your personal data is carried out by means of the operations indicated in the art. 4 Privacy Code and art. 4 no. 2) GDPR and precisely: collection, recording, organisation, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your personal data is subjected to both paper and electronic processing.

The Data Controller will process the personal data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the relationship for the Service Purposes and for no more than 2 years from the collection of the data for the Marketing Purposes.

### **4. Access to data**

Your data may be made accessible for the purposes referred to in the art. 2.A) and 2.B):

- to employees and collaborators of the Owner
- to third-party companies (for example, suppliers, credit institutions, professional firms, etc.) that carry out outsourced activities on behalf of the Data Controller, in their capacity as external data controllers.

### **5. Data communication**

Without your express consent (ex art. 24 letter a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to in the art. 2.A) to Supervisory Bodies, Judicial Authorities as well as all other subjects to whom communication is mandatory by law for the fulfillment of the aforementioned purposes. Your data will not be disclosed.

### **6. Data transfer**

The management and storage of personal data will take place on servers located within the European Union

of the Data Controller and/or third-party companies appointed and duly appointed as Data Processors. Currently the servers are located in Italy (Milan). The data will not be transferred outside the European Union. In any case, it is understood that the Data Controller, if necessary, will have the right to move the location of the servers to Italy and/or the European Union and/or non-EU countries. In this case, the Data Controller hereby ensures that the transfer of non-EU data will take place in compliance with the applicable legal provisions by stipulating, if necessary,

agreements that guarantee an adequate level of protection and/or adopting the standard contractual clauses provided for by the European Commission.

### **7. Nature of providing data and consequences of refusing to respond**

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we will not be able to guarantee the provision of the requested services and therefore the Services of the art. 2.A).

The provision of data for the purposes referred to in art. 2.B) is instead optional. You can therefore decide not to provide any data or to subsequently deny the possibility of processing data already provided: in this case, you will not be able to receive informative newsletters or commercial communications relating to the Services offered by the Owner. In any case you will continue to have the right to the Services referred to in the art. 2.A).

### **8. Rights of the interested party**

In your capacity as an interested party, you have the rights referred to in the art. 7 Privacy Code and art. 15 GDPR and precisely the rights of:

i. obtain confirmation of the existence or otherwise of personal data concerning you, even if not yet registered, and their communication in an intelligible form;

ii. obtain indication of: a) the origin of the personal data; b) the purposes and methods of processing; c) of the logic applied in case of processing carried out with the aid of electronic instruments; d) the identification details of the owner, managers and representative designated pursuant to art. 5, paragraph 2 Privacy Code and art. 3, paragraph 1, GDPR; e) of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representatives in the territory of the State, managers or agents;

iii. obtain: a) updating, rectification or, when you are interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed; c) certification that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except in the case in which this requirement is proves impossible or involves a manifestly disproportionate use of means compared to the protected right;

iv. object, in whole or in part: a) for legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, email and/or through traditional marketing methods by telephone and/or paper mail . Please note that the interested party's right of opposition, set out in the previous point b), for direct marketing purposes using automated methods, extends to traditional ones and that in any case the possibility for the interested party to exercise the right of opposition also remains only partially. Therefore, the interested party can decide to receive only communications via traditional methods or only automated communications or neither of the two types of communication. Where applicable, you also have the rights referred to in the articles. 16-21 GDPR (Right of rectification, right to be forgotten, right to limit processing, right to data portability, right to object), as well as the right to complain to the Guarantor Authority.

### **9. Method of exercising rights**

You can exercise your rights at any time by sending:

- a registered letter with return receipt to Visionplus S.r.l., via Cortelonga 12/14, 20900 Monza (MB); - an e-mail to [info@visionplus.it](mailto:info@visionplus.it)

### **10. Minors**

This Site and the Owner's Services are not intended for children under 18 and the Owner does not intentionally collect personal information relating to minors. In the event that information on minors is involuntarily recorded, the Owner will delete it promptly, upon request of the users.

### **11. Owner, manager and appointees**

The data controller is Visionplus S.r.l. The updated list of data controllers and persons in charge of processing is kept at the headquarters of the Data Controller.

### **12. Changes to this Policy**

This information may be subject to change. We therefore recommend that you regularly check this Policy and refer to the most updated version.