

## PRIVACY POLICY ADABRA DOMAIN

This information is provided pursuant to art. 13 of the European Regulation 679/2016 (GDPR), to those who connect to the websites [www.adspray.it](http://www.adspray.it) , [www.adabra.com](http://www.adabra.com) , [www.marketingspray.com](http://www.marketingspray.com) , [www.socialbusinessnetwork.it](http://www.socialbusinessnetwork.it) and to the pages or third level domains connected to it. The information is provided only for the aforementioned sites and not for other sites outside the portal of Ad Spray S.r.l., which may be consulted by the user via links. By browsing the above sites, personal data of users who consult them and interact with the related web services may be processed. This information also applies to purchases made in the e-shop.

### 1) Data controller

The data controller is Ad Spray S.r.l. with headquarters in Via XXV Aprile, 38 – 52100 Arezzo (Ar) VAT number 02087840514; [PRIVACY@adspray.it](mailto:PRIVACY@adspray.it). The Data Controller has appointed its own Data Protection Officer, which is also the contact point for data subjects, which can be reached by post at the address of the Data Controller's office or at the e-mail address [DPO@adspray.it](mailto:DPO@adspray.it).

### 2) Nature of the data processed and purpose of the processing.

#### Navigation data

Following consultation of these sites, data relating to identified or identifiable persons may be processed. The computer systems and software procedures used to operate this domain acquire, during 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 connecting to the site, the Uniform Resource Identifier (URI) notifications of the requested resources, the time of the request, the method used to submit the request to the server, the file size obtained in response given by the server (successful, 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 to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes to the detriment of the site: apart from this possibility, the data on web contacts are not maintained for more than 24 months.

#### Data provided by the user

The personal data that the user provides spontaneously, using the forms in the "contact us" pages, to request information or to answer their questions, are also processed. These data will be processed for the purpose of providing a response to the user and for the purpose of fulfilling any obligations required by European laws, regulations and standards and in case of need to exercise rights in court.

If consent is given, the aforementioned data will also be used to send the user commercial information on services deemed to be of interest to him.

#### E-shop

In the event that the user uses the e-shop of Ad Spray S.r.l. by registering to its sites and completing the purchase of its services, the following categories of personal data will also be processed:

- personal data;
- contact details;
- tax data;
- banking data;
- biometric data relating to the customer's graphometric signature.

The personal data of the users are collected and processed in order to manage the registration to the e-shop as well as the purchase and execution of the respective purchase and payment orders. The data are also processed in order to fulfill obligations under European laws, regulations and regulations and for the possible exercise of rights in court. For such activities the provision of data is necessary. Failure to provide it makes it impossible to execute the contract and provide the requested services. Consent for these purposes of treatment is not required.

It should be noted that the use of the graphometric signature is exclusively aimed at strengthening the guarantees of authenticity and integrity of the IT documents signed by the interested party, and takes place on the basis of the informed consent of the interested party. Furthermore, the processing is carried out in a correct, transparent and proportionate manner, resulting in the acquisition of only relevant information with respect to the authentication purposes of the data subjects, as provided by the Authority for the Protection of Personal Data in the matter of biometrics - 12 November 2014, doc. 3556992).

With the consent of users, which is free and optional, their personal data may also be processed for marketing purposes, i.e. to send by traditional mail, e-mails, newsletters, text messages such as text messages and MMS, information and promotional material on site products, special initiatives and / or promotions. It is always possible to object to receiving promotional communications; in fact, in every communication it is specified how to oppose the sending and not to receive such communications anymore. Conferring data for marketing purposes, as specified above, is optional and any refusal will have no consequences with respect to the requests for products, services and other features offered on the site.

The data may be used by Ad Spray S.r.l. also for profiling purposes and, therefore, to analyze user preferences and purchasing habits and create individual or group profiles. Ad Spray S. r.l. may also use personal data to perform statistical analysis and market research aimed at identifying products and / or services of interest to customers of their brands and improving their services (including websites). Conferring data for profiling purposes is optional and any refusal will have no consequences with respect to the requests for products, services and other features offered on the site.

## Cookie

Please refer to the specific Cookie Policy published on the websites of Ad Spray S.r.l. to have all the necessary information on the type and mode of operation of cookies and similar technologies, including profiling.

### 3) Legal bases.

Apart from that specified for navigation data, the user is free to provide his personal data if he intends to request

information or ask questions to the owner or if he intends to make purchases in the e-shop. The contact details will only be used to provide you with an answer or to return the services you have purchased in the e-shop. With specific and separate user consent, Ad Spray S.r.l. can process his graphometric signature, reach him with commercial communications related to its products and services, or perform profiling activities and statistical analyzes and market research above.

### 4) Recipients of the Data.

Whom who can access to the personal data are users who are authorized to process data under the direct authority of Ad Spray S.r.l. and the managers and sub-managers who provide Ad Spray with specific services and with whom Ad Spray S.r.l. has entered into a specific contract, as required by the GDPR.

The data processing carried out on this site are only handled by staff of Ad Spray S.r.l. specifically assigned to this, to which the operating instructions have been provided to carry out the processing activities in a lawful and correct manner. In case of necessity of maintenance interventions the data can be treated by the persons in charge of the responsible as above mentioned.

Personal data collected on the websites of Ad Spray S.r.l. they could be communicated to companies that act as autonomous owners and for which it avails itself for the supply of commercial, professional and technical services for the management of the site and the e-shop. All the aforementioned parties undertake to use the information received only for the aforementioned processing purposes, to keep it confidential, intact and unavailable to unauthorized third parties. In addition, personal data may be disclosed pursuant to a provision of law or regulation or to execute an order of an administrative or judicial authority. To have a complete list of the managers and sub-managers of the treatment and of the subjects to whom the data are communicated by Ad Spray S.r.l. you can write an e-mail to the address [DPO@adspray.it](mailto:DPO@adspray.it). In the event that the data were transferred to non-European countries, Ad Spray S.r.l. ensures that the transfer will take place through the adoption of adequate safeguards set by the GDPR.

### 5) Processing methods and storage times.

Personal data are processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access. All information collected on the site is stored and maintained in

secure facilities that restrict access to authorized personnel only. The websites of Ad Spray S.r.l. they are verified regularly to check for any security breaches, and to ensure that all information collected is inaccessible, accurate and unavailable to unauthorized parties.

The user's personal data will be kept for the time strictly necessary in order to manage his interaction with the website, as well as the purchase and execution of his orders, without prejudice to the obligations of retention of data required by law for purposes administrative, accounting and tax. In any case, the user's personal data will be erased or irreversibly anonymous, after 10 years from the date of purchase, that is to say, the limitation period has expired to enforce any contractual rights. The data processed for marketing and profiling purposes will be erased or irreversibly anonymous and stored only for statistical purposes, after 12 months and 24 months respectively, unless the user expresses a new consent.

#### 6) Right of access.

Articles 15 to 22, GDPR confer on the user, as interested subject, the exercise of specific rights. Article. 15 recognizes the right of individuals to access their personal data and to obtain a copy thereof. The right to obtain a copy of the data must not affect the rights and liberties of others. With the application for access, the user has the right to obtain from Ad Spray S.r.l. the confirmation whether or not data processing is being processed on personal data and the data subjects and categories of data processed, the third parties to whom the data are communicated and if the data are transferred to an extra-European country with adequate guarantees. The user also has the right to know the retention time of their personal data, with respect to the aforementioned purposes.

Other rights. With respect to personal data, the user has the right to request the correction of inaccurate data and the integration of incomplete data, the cancellation (right to be forgotten) under the conditions indicated in art. 17, GDPR, the processing limitation and data portability.

The user also has the right to object, at any time to the processing of data concerning him for marketing purposes, including profiling in so far as it is related to the activities of direct marketing. In each promotional e-mail the user will find specified how to object to the receipt of further communications and may, at any time, also oppose the receipt of promotional communications through all or only some of those procedures.

The user also has the right to withdraw his consent to the processing. The Holder will also provide the user with proof that the operations that follow the above requests have been brought to the attention of those to whom the data have been communicated, except in the case where this fulfillment proves impossible or involves a use of means clearly disproportionate to the protected right. To exercise the above rights, contact the Data Protection Officer of Ad Spray S.r.l. to the e-mail address [DPO@adspray.it](mailto:DPO@adspray.it), or by mail to the address of the registered office of Ad Spray S.r.l. To provide an answer, it may be necessary to identify the user by requesting to provide a copy of his / her ID. The Holder will provide written feedback without unjustified delay and, in any case, no later than one month after receipt of the request.

#### 7) Data transfer in non-European countries

The personal data of the Clients reside partly in servers located in the territory of the State and partly in the United States. With respect to personal data that are transferred to servers located in the U.S., an adequate level of protection of personal data is guaranteed, pursuant to art. 45 GDPR, having the hosting provider adhered to the EU-US Privacy Shield agreement. In any case of transfer, the adequate guarantees prescribed by the GDPR will be adopted by Ad Spray.

#### 8). Complaint to the Authority for the Protection of Personal Data.

The user who believes that the processing of their personal data violates the provisions of the GDPR or the internal regulations concerning the protection of personal data, has the right to propose a complaint to the Authority for the Protection of Personal Data based in Rome, pursuant to art. 77, GDPR, as well as acting before the judicial authority.

#### 9). Changes and updates to the site's privacy policy

This Privacy Policy may be amended and updated, in whole or in part, also in consideration of the modification of the applicable laws or regulations. The changes and updates to the Website Privacy Policy will be communicated to users by publishing the updated Privacy Policy on the Ad Spray Sr.l. with the words 'Privacy Policy Updated' and will be binding as soon as they are published on the websites. Users are therefore requested to check the publication of the most recent and updated version of the site Privacy Policy.