

## [Privacy Policy] Policy | 12 October 2023

Hello and welcome to the privacy policy (the "**Policy**") of chebuoni S.r.l. ("**CheBuoni**", "**we**" or "**us**"), the Italian company that has developed and owns the web platform published on the website [www.chebuoni.it](http://www.chebuoni.it) (the "**Platform**").

CheBuoni, through the Platform, helps the demand and offer of coupons, discount coupons, offers, promotions and competitions meet.

In particular, the platform allows:

- (i) to know in a simple and intuitive way, coupon, coupons, deals, promotions and contests sponsored by other companies not necessarily related to CheBuoni;
- (ii) to stay up-to-date on the best promotions through the Platform and, by way of example but not limited to, email, sms, social networks;
- (iii) to gain direct access to sites promoting the offers published on the platform.

Through the Platform, we collect some information about you, as a user ("**you**" or the "**user**"), classified as "**Personal Information**". In a general way, Personal information is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

The purpose of this Privacy Policy is to provide you with all the information you need to be aware of our policy regarding the collection, disclosure and use of your Personal Information as a User and, together with the Terms of Service (the "**TOS**"), they constitute the agreement governing the relationship between you and CheBuoni.

CheBuoni.it, if you wish to activate the platform services through services offered by third parties (by way of example but not limited to: login via Facebook Connect), could be shared personal information about yourself by these third parties.

This Policy does not apply to services offered by third parties and to the way they process information. We suggest that you carefully read the privacy policies of the respective third parties' website on how they will process your information and possibly share them with CheBuoni.

<https://www.facebook.com/policy.php>

This Policy is provided in compliance with art. 13 to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of Personal Information and on the free movement of such data (the "**General regulations on data protection**"). In the event that you are under the age of 18 (eighteen), or are incapable of acting, this Policy is addressed to the person

governed by applicable UK law, who is the only person authorized to give express consent thereto.

This Policy may be supplemented or amended in order to make it updated and/or adequate with respect to any technical changes made to the Platform and/or any changes in the purposes or methods of processing the Information.

We will notify you with specific and appropriate individual notices of any changes, but you should check this document periodically to stay up to date. Any updated version, which will bear the date on which the update was carried out, will be published promptly on the Platform and will become effective immediately after publication. Will be particularly considered in full force against you from the date of publication on the platform where you decide to unsubscribe from the platform after 7 days from notification.

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## **1. Data controller, Data processors and Data protection supervisor**

The data controller is Chebuoni S.r.l., with registered office in Bolzano, at vicolo Gumer 9, e mail [info@chebuoni.it](mailto:info@chebuoni.it), hereinafter also referred to as “**Controller**”.

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The following people are in charge of the processing (hereinafter referred to as “**Processors**”) for the purposes of statistical analysis, export, control and supervision in order to assure the smooth operation of the Platform:

Marangi Valentino

Marzio Antonio

The detailed list of data processors may be requested by submitting a written request to the Owner at the addresses shown above.

We have appointed a data protection officer ("Data Protection Officer") who can be contacted at the email address [dpo@gwgroup.it](mailto:dpo@gwgroup.it) or by certified email at the address [chebuonisrl@legalmail.it](mailto:chebuonisrl@legalmail.it) or by ordinary mail to Chebuoni S.r.l. - DPO, vicolo Gumer 9, 39100, Bolzano (BZ).

## **2. Types of data processed and purpose of the processing**

### **2.1 Data and browsing activities**

The computer systems and procedures used to operate the Platform may automatically acquire, during their normal operation, certain Personal Information concerning your navigation, such as, by way of example, IP address, number of accesses, duration of navigation, browser used, pages viewed, date and time of access.

The Personal Information relating to your navigation is mainly gathered in order to obtain

statistical and non-identifying information about the use of the Platform and to control its correct functioning Personal Information relating to your navigation may also be processed, after the registration, which is necessary for the use of services accessible through the use of credentials as per art. 2.2. for:

(i) **Profiling activities, i.e. the study and analysis of your interests and requests for the purposes of defining individual and group profiles** , subject to your prior express consent, as indicated by ticking the "I expressly consent, in particular, to the processing of my Personal Information for profiling purposes, highlighted in bold in point (i) of art. 2.1 and (ii) of Article 2.2, extruded *here* for clarity". The consent to the processing of this data is optional and refusal to treatment will not result in the inability to use the services of the platform. Even in case of consent, you will still have the right to object, in whole or in part, to the processing of your Personal Information for profiling purposes, making a simple request to the Controller, without any formality.

**How can we use your Personal Information for this purpose?** We may process your Personal Information about you to better understand your interests and preferences, so that we can provide you with an experience that is consistent with those interests and preferences. For example, we may do so in order to provide you with access to content for which you have shown the most interest, or to send you personalized offers or promotions via email (provided that you have consented to receive our communications for advertising and commercial purposes), or to offer you advertising content relating to your interests.

**On what legal basis will we be able to process your Personal Information in this way?** Provided that you have given your consent and that this is in line with your choices in this regard, it is in our legitimate interest to look at your preferences, based on the way you navigate, so that we can better customize our offer.

In order to perform these operations, the Platform currently uses:

(i) we use Google Analytics, a web analytics service provided by Google that sends cookies to your device.

### **2.1.1 Cookies**

Cookies (“**Cookies**”) are small strings of text that are stored on your device and recording some data about your browsing activities. This data, if the Cookies are not disabled, are communicated to the website or application that installed them every time you return to visit it.

Types of cookies:

Technical cookies: allow you to browse through the website or application and use options or services. For example, they identify the session, restrict access to web

parts, remember the elements of an order, make a request to register to or participate in an event, use security features while browsing, and store content for audio or video broadcast. In other words, all those Cookies necessary to satisfy the specific request that the user made at that time and that are not used for further purposes.

Profiling cookies : allow a more effective management of the advertising space of the website or application and allow the adaptation of the advertising so that the same can be relevant to the user and prevent the user from seeing advertising already seen. Such cookies therefore carry out a real profiling of the user's behavior.

Third-party cookies : Third-party cookies are cookies, used by the operator of the website or application, but installed on the user's device by third parties other than the operator of the website or application. Third-party cookies are, for example, the statistical services of Google Analytics or the advertising service of Google AdSense.

The platform, specifically, use:

- (i) Technical cookies (which store your login credentials in order to make it easier to log in) and for which your specific consent is not required;
- (ii) Profiling cookies that keep track of the choices you have made in the navigation and use of the services of the Platform, in order to ensure a personalized and easier use of the services offered by the Platform, for which your specific consent is required and that we notify to the Data Protection Authority;
- (iii) Third-party analytic cookies:
  - (iii)(a) concretely adopted with measures that allow to eliminate the identifying power and not crossed by the third-party, for which your specific consent is not required;
  - (iii)(b) adopted without precautions that eliminate the power of identification, for which your specific consent is required.

If you would like to have more information about these cookies, and understand how to refuse or delete it, please take a look at the privacy policies below, using the addresses supplied.

Below is a list of Cookies used.

Cookie name	Domain	Description	Duration
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user	chebuoni.it	Contains the information entered by the user in the process of registration to our landing pages, is used for tracking user activities on our site and for any pre filling of fields required	365 days
cookiePolicy	chebuoni.it	Used to check whether or not you have accepted the cookie policy	1 year
already_registered	chebuoni.it	Used to check that you are already registered with our site	1 year
alias	chebuoni.it	It is used to trace the landing page of the user's origin	1 month
campaign	chebuoni.it	It is used to track a user's participation in a particular third party campaign.	1 year
PHPSESSID	chebuoni.it	It is used by PHP language to perform variable passage functions that do not identify the user for normal service operation.	1 year

(i) Google Analytics (Google Inc.) → Identifying third-party cookies. Google Analytics uses cookies to collect and analyze information about the Platform's usage behavior. The information collected and processed by Google Analytics allows us to compile reports on the activities carried out on the Platform. We use Google's analysis tool to track or collect

personal identifying information and for profiling purposes.

For more information, please go to the links below: <http://www.google.com/policies/privacy/partners/>

The user can selectively disable the Google Analytics action by installing the opt-out component provided by Google on his/her browser. Therefore, if you want to disable the action of Google Analytics, we invite you to access the following link:

<https://tools.google.com/dlpage/gaoptout>

(ii) Google Adwords & Google Remarketing Cookies (Google Inc.) → Non-identifying third party cookies

The platform could use Google Adwords and the Google Remarketing technology. To help us keep track of sales and other conversions, a cookie is added to a user's computer when that user clicks on an ad. This cookie lasts 30 days and does not collect, nor monitors information able to personally identify a user. Users can disable Google conversion monitoring cookies in the settings of your Internet browser.

To learn more, [click here](#)

(iii) Bing Ads (Microsoft Inc.) → Nonidentifying third-party cookies

For more information about the Remarketing of Microsoft, please visit the page <http://choice.microsoft.com/it-IT>

For more information on the Rules and Principles of Microsoft Privacy you can visit <http://www.microsoft.com/privacystatement/it-it/bingandmsn/default.aspx>

(iv) Facebook Ads (Facebook Inc.) → Identifying third-party cookies

For more information about remarketing of Facebook you can visit the page

<https://www.facebook.com/help/1505060059715840>

(v) Nugg Ad → Identifying third-party cookies For more information, please visit

<https://www.nugg.ad/it/privacy/informazioni-general.html>

(vi) HubSpot → Nonidentifying third-party cookies

For more information on the Rules and Principles of Microsoft Privacy you can visit

<https://www.archimedia.it/cookies-policy>

Cookies installation, which normally takes place automatically with most browsers, can be prevented by simply disabling your browser functions, enabling the receipt of Cookies.

For more information about Cookies, click on the link of the navigation browser you

usually use:

- - Firefox ;
- - Internet Explorer ;
- - Google Chrome ;
- - Bing ;
- - Safari ;

For further information or clarification, you can contact us by email at:  
[privacy@chebuoni.it](mailto:privacy@chebuoni.it).

If you decide not to enable Cookies, your experience on the Platform may be limited.

You can find further information on cookies and how to manage them by consulting the site [www.aboutcookies.org](http://www.aboutcookies.org) or by consulting the measure identification of simplified ways for information and acquisition of consent for the use of cookies .

## **2.2 Data processed in relation to the use of services accessible through the use of credentials**

Some services of the Platform are reserved to Registered Users. To complete the registration process, you will need to provide, among others, the following Personal Information:

- - phone number
- - e-mail address (which will also be your username)
- - Name
- - Last name
- - Postal Code
- - Gender
- - Date of Birth

The provision of any other personal information required in the context of the registration procedure, unless otherwise stated expressly as obligatory, is optional and fully remitted to your will.

**How can we use your Personal Information for this purpose?** Generally speaking, we

may need to use the Personal Information above, such as your email address, to set up and manage your account (for example, to send you password reminders or notifications of changes to your account details).

**What is the legal basis that allows us to treat your personal information in this way?**

Will ask for your consent before we process your Personal Information in this way.

Processing your personal information is required to set up and manage your account. The Personal Information supplied for the use of services accessible through the use of credentials, together with data provided by third parties that you used to sign up to the platform, may also be used for:

**(i) Sending communications for advertising and commercial purposes, as well as for direct sale by CheBuoni also referring to products and services of third parties, avoiding the communication of your data to such subjects.** Subject to obtaining express consent, as shown in the checkbox of the item *"I expressly consent, in particular, to the processing of Personal Information for purposes of sending advertising communications and for commercial purposes generally highlighted in bold in point (i) of Article. 2.2, extruded, for clarity, here"*, your Personal Information may be used by CheBuoni for the purpose of sending advertising and commercial communications (marketing) and / or direct sale of products or services of its own or third parties, by e-mail, fax, telephone and any other technology of distance communication, including social media, taking into account any indications that you decide to provide by freely answering questions that you do to learn more about your requests and your interests . The consent to the processing of this data is optional and refusal to treatment will not result in the inability to use the services of the platform. Even if consensus is achieved, you will still have the right to object, in whole or in part, to the processing of your Personal Information for marketing purposes and/or direct sales by simple request to the data controller, without any formalities.

**How may we use your personal information for this purpose?** We process Personal Information for sending information and advertising material, also by third parties; send commercial communications, also interactive; carry out direct sales or placement of products or services; that is, for all purposes legitimate trade.

**What is the legal basis that allows us to treat your personal information in this way?** As long as you have expressed your consent and that this is in line with your choices about, is our legitimate interest can use Personal Information for the sending of commercial communications with the aim of: (i) to be able to offer a platform services completely free of charge; and at the same time, (ii) make CheBuoni economically viable. In fact, we're a startup offering services free of charge, offsetting such gratuity with monetization resulting from the supply of advertising content.

**(ii) profiling activities, study and analysis of your interests and your requirements for the purposes of the definition of individual and group profiles** , after obtaining your consent, as resulting from tick the item *"I agree specifically, in particular, to the processing of personal information for the purpose of profiling, highlighted in bold in the point (s) of art. 2.1 and (ii) of art. 2.2, extruded, for clarity, here . "* The consent to the processing of this data is optional and refusal to treatment will not result in the inability to use the services of the platform. Even in case of consent, you will still have the right to object, in whole or in part, to the processing of your Personal Information for profiling purposes, making a simple request to the Controller, without any formality.

**How can we use your Personal Information for this purpose?** We may process your Personal Information to better understand your interests and preferences, in order to provide you an experience that is consistent with those interests and preferences. For example, we may do so in order to provide you with access to content for which you have shown the most interest, or to send you personalized offers or promotions via email (provided that you have consented to receive our communications for advertising and commercial purposes), or to offer you advertising content relating to your interests. This includes, for example, adapting our advertising to make certain advertisements visible when the public is particularly interested in them.

**On what legal basis do we treat your Personal Information in this manner?**

Provided that you have given your consent and that this is in line with your choices, it is our legitimate interest to look at your preferences, taken from the way you navigate, so that we can better customize our offer.

**(iii) Communication of data to third parties for sending advertising and commercial messages (marketing) and direct sale by such third parties** . After obtaining your express consent, as shown in the check box of the item *"I expressly consent, in particular, that my Personal Information be disclosed to third parties for the purposes highlighted in bold in point (iii) of art. 2.2, extruded, for clarity, here"*, **your Personal Information may be used by CheBuoni to communicate them to third parties (as specified in point 3) for the purpose of sending advertising and commercial communications (marketing) and / or direct sale by such third parties, by e-mail, fax, telephone and any other remote communication technology , including social media** . The consent to the processing of this data is optional and refusal to treatment will not result in the inability to use the services offered on the Platform. Even in case of consent, you will still have the right to object, for the future, in whole or in part, to the disclosure of your Personal Information to third parties, by making a simple request to the Processor, without any formality.

**How can we use your Personal Information for this purpose?** If you have expressly agreed that, in particular, your Personal Information will be disclosed to third parties for the purpose of sending advertising and commercial messages (marketing) and direct sales by such third parties, your Personal Information may be transmitted to our business partners so that they can send you, by e-mail, fax, telephone and any other remote communication technology, including social media offers on their products or services. Keep in mind, though, that our business partners are responsible for the processing of each in relation to your privacy policy.

**On what legal basis do we treat your Personal Information in this manner?**

Provided that you have given your consent and that this is in line with your choices, it is in our legitimate interest to be able to disclose your Personal Information to our business partners for the purpose of: (i) offering you the services of the Platform completely free of charge; and (ii) making CheBuoni economically viable. In fact, we're a startup offering services free of charge, offsetting such gratuity with monetization resulting from the supply of advertising content.

**(iv) Any further purpose necessarily connected to the execution of the services of the Platform, as illustrated in the TOS .**

**How can we use your Personal Information for this purpose?** We may need to use your Personal Information if necessary to fulfill our contractual obligations to you, for example when you requested access to the Platform's services.

**On what legal basis do we treat your Personal Information in this manner?** If you have requested the performance of the Platform's services, as described in the TOS, processing of your Personal Information is necessary to fulfill our contractual obligations to you.

**(v) Any further purpose necessarily allowing us to comply with the requirements of the Personal Information Protection Act .**

**How can we use your Personal Information for this purpose?** In some cases, we may need to process your Personal Information to comply with applicable law. You may, for example, no longer want to be contacted by us. For this reason, we keep your suppression list so that we do not contact you if you have asked us not to. To this end, we may need to process certain Personal Information

**What is the legal basis that allows us to treat your personal information in this way?** It is our right to treat your personal information to comply with applicable laws. It is our right to process your Personal Information, for example, to keep the suppression list updated and not to contact you if you have asked us not to do so.

### **2.3 Personal information you willingly provide us with:**

The Personal Information that you provide to us voluntarily and freely on the basis of your autonomous impulse (for example sending e-mails to the e-mail addresses indicated on the Platform for the purpose of obtaining information), will be acquired by us and processed as Data Controller.

In particular, in addition to your e-mail address, required to reply to you, any other Personal Information will be acquired where electronic communication references or otherwise contained in the e-mail message. Such Personal Information, if different from those already in our possession and subject to explicit consent to the processing, as per art. 2.2, will not in any way be disclosed or communicated to third parties with respect to the owner's organization, nor will they be used to define the profiles or personalities of the data subject or for direct or indirect commercial or advertising purposes and, in any case, will be kept exclusively for the purposes of keeping correspondence.

### **2.4 Geolocalization**

The possible acquisition of data on your position will be possible only with your express consent during the use of the Platform. With your prior consent, we may use this information to provide you with services and/or adverts available in your region, based on the permissions you provided and based on the settings of your device.

You may at any time turn off geolocation, both from your personal account in the platform and the settings of your device. For more information on how to disable this service on your device, we recommend that you contact the manufacturer of your device.

**How can we use your Personal Information for this purpose?** We may process Personal Information to provide you with an experience more in line with your local area. For example, we can do this to offer you access to content or promotions tailored to your region.

**On what legal basis do we treat your Personal Information in this manner ?** Provided that you have given your consent and that this is in line with your choices in this regard, it is our legitimate interest to look at your territorial area, so as to be able to better customize our offer.

### **2.5 Social Network**

We permit or will permit you to register and/or use our services through the accounts of some of the most important social networks (including, but not limited to, Facebook). By choosing to use these services to register with the Platform, or to take advantage of our social services, you authorize us to collect your Personal Information to authenticate to such social networks (e.g. your username, your access details - in encrypted form -, the image of your profile, the country you have designated as your residence, your home

town, your date of birth, the images and network of your contacts, as well as all the other information that you can make available on, or through, your accounts and your activity on social networks).

The Personal Information we have access to varies depending on how you set your privacy settings and consent on those social networks. If you decide to associate the account managed by one of the abovementioned social networks to your account on the Platform - authorizing access to your Personal Information - you authorize us to acquire, process and possibly communicate the Personal Information on these social networks, in accordance with this Policy and for all the specific purposes thereof.

Please note that we do not and will not retain your Facebook account password. If you wish to use the social features of the Platform, we inform you that we will use your username and profile image (if you decide that you do not wish to authorize the processing of any of this Personal Information, you may change your preferences directly to your personal account on the Platform).

## **2.6 Personal Information protection**

With reference to Personal Information, the Platform provides for the use of particularly advanced encryption technologies to protect its integrity and confidentiality.

The data is saved on an architecture that allows daily backup and in case of transfer, subject to consent, the sensitive data is encrypted using algorithms AES, MD5 or SHA2.

However, note that the use of an open and public telematic system such as the Internet for the transmission of information increases the normal risks of any remote service

## **3. Categories of subjects to whom Personal Information may be communicated and extent of data disclosure**

Unless otherwise specified in relation to the individual processing purposes as specified above, the personal information collected may be disclosed to – or otherwise become aware of – treatment's executors or processors (including external), in relation to the powers and functions of each, in order to fulfill the above purposes or to ask you specific contractual and/or regulatory requirements.

Your Personal Information may also be brought to the attention of the following subjects or of the following categories of subjects, to the extent that this is necessary for the fulfillment of legal and/or contractual obligations:

- (i) consultants or collaborators, internal and/or external, for the fulfillment of the regulations in force and/or for the fulfillment of contractual services in relations with the individuals concerned (by way of example but not limited to: labour consultants, legal consultants, accountants, tax experts, auditors, etc.);
- (ii) judicial or other public authorities, in compliance with the purposes specified above or

with legal obligations.

Your Personal Information may then be disclosed to companies, which CheBuoni may contact to carry out the operations necessary for the execution of the provisions received by you and the provision of services requested.

With your express consent, your Personal Information may be transmitted to our third party commercial partners for processing for commercial and advertising purposes. These third-party companies, as we shall see later, will act as independent data controllers assumes no responsibility for the content of their advertising and compliance with legislation on Personal Information processing, nominating, any controllers, should entrust the processing of your data in outsourcing. The commercial communications that may be sent to you may concern the following product categories, since they are third party companies belonging to the following sectors:

	1 Communications: communications and technology products and services, etc.
2	Finance and banking: financial institutions, insurance, investment, social security, etc.
3	Free Time: pay TV, publishing, tourism, sports, collecting, photography, pastime, games, transport, navigation, tourism (hotels, tour operators, travel agencies, airlines, etc.), aerospace, publishing, gardening, hobbies, lottery, competitions, collecting, photography, pastimes, communication and entertainment, art, music, etc.
4	Distribution and marketing: electronics, IT, image and sound, fashion, accessories, clothing, textiles, bazaars, cosmetics and sanitary, chemical, pharmaceutical and biotechnology, agri-food, supermarkets, drinks, office supplies, furniture, etc.
5	Automotive: products and services related to cars, industrial vehicles, cycles and motorcycles, trucks, mechanics and metallurgy, etc.
6	Energy and water: products related to electricity, hydrocarbons, gas, water and utilities, etc.
7	NGOs and associations: products and services related to non-profit organizations, foundations, etc.
	8 Education, training, instruction, universities, etc.
9	Communication and services: advertising, marketing, events, consulting, advertising, PR agencies, advertising agencies, media centers, telecommunications, market research, etc.
	9 Ecology and Environment

11	Construction, civil engineering and real estate products/services: construction, decoration, home, design, real estate agencies, etc.
	2 Fairs and events, etc.
	3 Computing, Internet, e-commerce websites, etc.
	4 Casino, etc
	5 Political Communications

Personal information communicated to third-party companies, may be used by such companies as stipulated in their own respective policies. In some cases, these third-party companies, as independent data controllers, may prefer to contact you directly to inform you in detail about how they will process your Personal Information, what opportunities they have in store for you and how to exercise your rights against them. These third companies may retain the data communicated for the purpose of sending advertising and commercial communications (marketing) and/or direct sales, by e-mail, fax, telephone and any other technology of distance communication, without prejudice to your right to object at any time to the processing for such purposes, making a simple request without any formality to the relevant data controller.

Your Personal Information may be disclosed to such third-party companies on the basis of contracts entered into between us and such third-party companies, therefore an updated list of such third-party companies is always available [on this page](#), constantly updated and will be provided to you quarterly via email communication.

In the communication of your Personal Information to such third-party companies we always take care to treat your personal information in accordance with the principles of lawfulness and fairness, in compliance with the safety standards required by law.

None of your Personal Information will be voluntarily disclosed unless expressly authorized by you.

#### **4. Processing method**

Personal Information held for the above purposes are handled by us, lawfully and fairly, through the prevalent use of automated or semi-automated tools.

#### **5. Optional provision of data and consequences of your refusal**

Except for the cases in which the acquisition of Personal Information is qualified as necessary in order to use the services you have requested, the provision of any other Personal Information is entirely optional.

Your failure to provide optional data does not entail any prejudicial consequences for you.

Failure to provide the necessary data may make it impossible to use the services for which it is necessary to provide such data.

## **6. Duration of storage of your personal information**

In compliance with the provisions of the applicable legislation regarding the protection of personal data, your Personal Data is stored for the period of time strictly necessary for the fulfillment of our obligations and to achieve the purposes for which such data were collected and for any other legitimate purpose coltied. When we no longer need to use your Personal Data, we will remove it from our systems and records and/or we will take appropriate measures to anonymize them so as to prevent you from being identified (except where we have need to maintain such data in order to comply with our regulatory obligations). In any case, the maximum data retention time will not exceed 36 months from registration for the purposes of sending commercial communications and communication tion of data to third parties. For profiling activities, the maximum retention time ne of the data will not exceed 12 months. Personal data collected for purposes related to the fulfillment of contractual obligations yours will be retained until the execution of the contract between is completed User and Owner. Personal data collected for purposes attributable to legitimate interest of the Owner will be retained until this interest is satisfied. The Personal Data of Users registered on the Platform will be retained throughout time in which the User will continue to carry out actions (we consider actions or activities, by way of example and not limited to, any access to the platform, entirely tion with communications sent by the Owner, access to any service or conheld on the Platform) and in any case until the consent is revoked. If the User does not carry out actions for a period of 36 months from registration, the Owner lare will proceed to delete the data. The User can obtain further information regarding the legitimate interest pursued to by the Owner both from the contents of this document and by contacting the Owner himself.

## **7. Rights of data subjects**

You have the right to request details about the Personal Information we process and to revoke your consent to its prior processing, to correct or delete it and not to be contacted if you have not requested it.

### ***(i) The right to access your Personal Information***

You can request access to your Personal Information by contacting us through the contact details at the bottom of the page. The file containing your Personal Information is usually made available within 10 days. It will be made available for a maximum of 30 days. We may at times be in a position not to allow access to your Personal Information (for example, if access unreasonably damages someone else's privacy or endangers someone's security). In this case, we will provide you with a formal and explicit explanation of why this is not possible. In some cases, we may also charge you an administrative fee to provide access to your Personal Information. Any fees will be reasonable and before we provide access to your Personal Information we will notify you to obtain your consent. If a copy of your Personal Information is requested by electronic

means, such as email, we will provide you with an electronic copy of your information, unless you request otherwise.

***(ii) The right to modify or cancel / obliterate your Personal Information***

If you have created an account, you can access this account to edit or delete your Personal Information.

Otherwise, you can send your request to [privacy@chebuoni.it](mailto:privacy@chebuoni.it). If you are having trouble updating or deleting your data, you can still send an email with your request to [privacy@chebuoni.it](mailto:privacy@chebuoni.it) and we will solve the problem as soon as possible.

In the event of exercising the right to oblivion, we will inform our business partners and any other parties to whom the Personal Information has been communicated about your request.

***(iii) Right to object to the processing of your Personal Information***

You have the right to require us to discontinue the processing of your Personal Information, even if such processing is necessary for our legitimate interests (for example, when the processing is necessary for the commercial purposes we intend to achieve), including for the data we use to send you personalized offers, product recommendations and similar communications. You also have the right to ask us to stop the processing of your Personal Information for purposes of direct advertising. However, we will only send you advertising communications if you have given us your prior express consent. If you change your mind, you can easily unsubscribe from our advertisements at any time by following the instructions included in the advertisements. If you have consented to receive offers from our business partners, they are responsible for your rights, including the right to opt-out of receiving their offers. However, you can opt out of receiving such offers from third parties at any time by logging into your account and changing your settings. If you have already agreed to receive such offers, your Personal Information will cease to be transmitted to our business partners from the day your request is processed.

***(iv) The right to have your Personal Information transmitted to another organization (also referred to as the Portability of Personal Information)***

In case of processing of your Personal Information on the basis of your consent or for the execution of a contract, you have the right to ask us to provide you with the data concerning you and held by us in a structured format, commonly used and legible, as well, where technically possible, to transmit this data directly to another organization.

***(v) Complaints***

If you believe that the applicable legislation on the protection of Personal Information has been violated, you have the right to lodge a complaint with the Local Authority for the Protection of Personal Information in the European Economic Area (" EEA ").

The local Personal Information Protection Authority will differ depending on the country you are in. In the annex to the Privacy Policy, you can find a list of the local authorities for the protection of Personal Information in the EEA countries in which we operate.

The above mentioned rights can be exercised by you at any time by sending us a simple request via e-mail.

### **Physical location of Personal Information**

Your Personal Information is stored within the European Economic Area (" **EEA** "). Your Personal Information, specifically, is stored on OVH servers, located at the Netherlands, Germany and France.

However, they may be transferred to, and stored in, a location outside the EEA where such countries are deemed by the European Commission to provide an adequate level of protection. Your Personal Information may also be processed by personnel operating outside the EEA who work for us or for one of our service providers. We will do everything we can reasonably do to ensure that your Personal Information is processed in a secure and consistent manner with the applicable privacy policy and laws, including, where appropriate, by adhering to European standard contractual clauses (or equivalent measures) with legal entities outside the EEA receiving the personal information.

### **9. How to contact us**

If you have any questions or concerns about how we process your Personal Information, or would like to discontinue processing, or would like to request a copy of such information, please contact us by email at [privacy@chebuoni.it](mailto:privacy@chebuoni.it) or send a registered letter to CheBuoni Srl, vicolo Gumer, 9, Bolzano, Italy. Please include your response address when writing to us.

**Attachment List of Personal Information Protection Authorities (EEA countries)** If you believe that the applicable legislation on the protection of personal information has been violated, you have the right to lodge a complaint with the Local Authority for the Protection of Personal Information of the European Economic Area (EEA). The local authority is different in every country. Below you can find details of the local data protection authorities of the countries of the European Economic Area.

#### **Country Authority for the Protection of Personal Information**

##### **Austria Österreichische Datenschutzbehörde**

Hohenstaufengasse 3  
1010 Wien  
Tel. +43 1 531 15 202525  
Fax +43 1 531 15 202690  
e-mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)  
Sito web: <http://www.dsb.gv.at/>

##### **Belgium Commission de la protection de la vie privée**

Rue de la Presse 35  
1000 Bruxelles  
Tel. +32 2 274 48 00  
Fax +32 2 274 48 10  
e-mail: [commission@privacycommission.be](mailto:commission@privacycommission.be)  
Sito web: <http://www.privacycommission.be/>

**Bulgaria Commission for Personal Data Protection**

2, Prof. Tsvetan Lazarov blvd.  
Sofia 1592  
Tel. +359 2 915 3523  
Fax +359 2 915 3525  
e-mail: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)  
Sito web: <http://www.cpdp.bg/>

**Croatia Croatian Personal Data Protection Agency**

Marticeva 14  
10000 Zagreb  
Tel. +385 1 4609 000  
Fax +385 1 4609 099  
e-mail: [azop@azop.hr](mailto:azop@azop.hr) or [info@azop.hr](mailto:info@azop.hr)  
Sito web: <http://www.azop.hr/>

**Cyprus Commissioner for Personal Data Protection**

1 Iasonos Street,  
1082 Nicosia  
P.O. Box 23378, CY-1682 Nicosia  
Tel. +357 22 818 456  
Fax +357 22 304 565  
e-mail: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)  
Sito web: <http://www.dataprotection.gov.cy/>

Czech  
Republic

**The Office for Personal**

**Data Protection** Urad pro

ochranu osobnich udaju Pplk.

Sochora 27

170 00 Prague 7  
Tel. +420 234 665 111  
Fax +420 234 665 444  
e-mail: [posta@uouu.cz](mailto:posta@uouu.cz)  
Sito web:  
<http://www.uouu.cz/>

**Denmark Datatilsynet**

Borgergade 28, 5  
1300 Copenhagen K  
Tel. +45 33 1932 00  
Fax +45 33 19 32 18  
e-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)  
Sito web: <http://www.datatilsynet.dk/>

**Estonia Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon)**

Väike-Ameerika 19  
10129 Tallinn  
Tel. +372 6274 135  
Fax +372 6274 137  
e-mail: [info@aki.ee](mailto:info@aki.ee)  
Sito web: <http://www.aki.ee/en>

**Finland Office of the Data Protection Ombudsman**

P.O. Box 315  
FIN-00181 Helsinki

Tel. +358 10 3666 700  
Fax +358 10 3666 735  
e-mail: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)  
Sito web: <http://www.tietosuoja.fi/en/>

France **Commission Nationale de l'Informatique et des Libertés - CNIL** 8 rue  
Vivienne, CS 30223

F-75002 Paris, Cedex 02  
Tel. +33 1 53 73 22 22  
Fax +33 1 53 73 22 00  
e-mail:  
Sito web: <http://www.cnil.fr/>

Germany **Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit**

Husarenstraße 30  
53117 Bonn  
Tel. +49 228 997799 0; +49 228 81995 0  
Fax +49 228 997799 550; +49 228 81995 550  
e-mail: [poststelle@bfdi.bund.de](mailto:poststelle@bfdi.bund.de)  
Sito web: <http://www.bfdi.bund.de/>

In Germania, la competenza per i reclami è divisa fra diverse Autorità di vigilanza per la protezione dei dati personali.

Le autorità competenti possono essere identificate con la lista prevista al link seguente:

[https://www.bfdi.bund.de/bfdi\\_wiki/index.php/Aufsichtsbeh%C3%B6rden\\_und\\_Landesdatenschutzbeauftragte](https://www.bfdi.bund.de/bfdi_wiki/index.php/Aufsichtsbeh%C3%B6rden_und_Landesdatenschutzbeauftragte)

Greece **Hellenic Data Protection Authority**

Kifisias Av. 1-3, PC 11523  
Ampelokipi Athens  
Tel. +30 210 6475 600  
Fax +30 210 6475 628  
e-mail: [contact@dpa.gr](mailto:contact@dpa.gr)  
Sito web: <http://www.dpa.gr/>

Hungary **Data Protection Commissioner of Hungary**

Szilágyi Erzsébet fasor 22/C  
H-1125 Budapest  
Tel. +36 1 3911 400  
e-mail: [peterfalvi.attila@naih.hu](mailto:peterfalvi.attila@naih.hu)  
Sito web: <http://www.naih.hu/>

Iceland **The Icelandic Data Protection Authority**

Rauðarárstígur 10, 105 Reykjavík, Iceland  
Tel. +354-510-9600  
e-mail: [postur@personuvernd.is](mailto:postur@personuvernd.is)  
Sito web: <https://www.personuvernd.is/>

Iceland **Data Protection Commissioner**

Canal House  
Station Road  
Portarlinton  
Co. Laois  
Lo-Call: 1890 25 22 31  
Tel. +353 57 868 4800  
Fax +353 57 868 4757  
e-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)  
Sito web: <http://www.dataprotection.ie/>

Italy **Garante per la protezione dei dati personali** Piazza di  
Monte Citorio, 121  
00186 Roma  
Tel. +39 06 69677 1  
Fax +39 06 69677 785  
e-mail: [garante@garanteprivacy.it](mailto:garante@garanteprivacy.it)  
Sito web: <http://www.garanteprivacy.it/>

Latvia **Data State Inspectorate**

Direttore: Sig. Signe Plumina  
Blaumana str. 11/13-15  
1011 Riga  
Tel. +371 6722 3131  
Fax +371 6722 3556  
e-mail: [info@dvi.gov.lv](mailto:info@dvi.gov.lv)  
Sito web: <http://www.dvi.gov.lv/>

Liechtenstein **Datenschutzstelle**

Kirchstrasse 8  
Postfach 684  
9490 Vaduz  
Tel: +423 236 60 90  
e-mail: [info.dss@llv.li](mailto:info.dss@llv.li)  
Sito web: <http://www.llv.li/#/1758/datenschutzstelle>

Lithuania **State Data Protection**

Žygimanty str. 11-6a  
011042 Vilnius  
Tel. + 370 5 279 14 45  
Fax +370 5 261 94 94  
e-mail: [ada@ada.lt](mailto:ada@ada.lt)  
Sito web: <http://www.ada.lt/>

Luxembourg **Commission Nationale pour la Protection des Données 1,**

avenue du Rock'n'Roll  
L-4361 Esch-sur-Alzette  
Tel. +352 2610 60 1  
Fax +352 2610 60 29  
e-mail: [info@cnpd.lu](mailto:info@cnpd.lu)  
Sito web: <http://www.cnpd.lu/>

Malta **Office of the Data Protection Commissioner** Commissario per la protezione

dei dati personali: Sig. Joseph Ebejer 2, Airways House  
High Street, Sliema SLM 1549  
Tel. +356 2328 7100  
Fax +356 2328 7198  
e-mail: [commissioner.dataprotection@gov.mt](mailto:commissioner.dataprotection@gov.mt)  
Sito web: <http://www.dataprotection.gov.mt/>

The  
Netherlands  
**Autoriteit Persoonsgegevens**  
Prins Clauslaan 60  
P.O. Box 93374  
2509 AJ Den Haag/The Hague  
Tel. +31 70 888 8500  
Fax +31 70 888 8501  
e-mail:  
[info@autoriteitpersoonsgegevens.nl](mailto:info@autoriteitpersoonsgegevens.nl)  
Website:  
<https://autoriteitpersoonsgegevens.nl/nl>

Norway **Datatilsynet**

Postboks 8177 Dep.  
0034 Oslo  
Tel: +47 22 39 69 00  
e-mail: [postkasse@datatilsynet.no](mailto:postkasse@datatilsynet.no)  
Sito web: <https://www.datatilsynet.no/English/>

**Poland The Bureau of the Inspector General for the Protection of Personal Data - GIODO ul.**

Stawki 2  
00-193 Warsaw  
Tel. +48 22 53 10 440  
Fax +48 22 53 10 441  
e-mail: [kancelaria@giodo.gov.pl](mailto:kancelaria@giodo.gov.pl); [desiwm@giodo.gov.pl](mailto:desiwm@giodo.gov.pl)  
Sito web: <http://www.giodo.gov.pl/>

**Portugal Comissão Nacional de Protecção de Dados - CNPD**

R. de São. Bento, 148-3°  
1200-821 Lisboa  
Tel. +351 21 392 84 00  
Fax +351 21 397 68 32  
e-mail: [geral@cnpd.pt](mailto:geral@cnpd.pt)  
Sito web: <http://www.cnpd.pt/>

**Romania The National Supervisory Authority for Personal Data Processing**

Presidente: Sig.ra Ancuta Gianina Opre

B-dul Magheru 28-30  
Sector 1, BUCURESTI  
Tel. +40 21 252 5599  
Fax +40 21 252 5757  
e-mail: [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro)  
Sito web: <http://www.dataprotection.ro/>

**Slovakia Office for Personal Data Protection of the Slovak Republic**

Hranicná 12  
820 07 Bratislava 27  
Tel.: + 421 2 32 31 32 14  
Fax: + 421 2 32 31 32 34  
e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)  
Sito web: <http://www.dataprotection.gov.sk/>

**Slovenia Information Commissioner**

Sig.ra Mojca Prelesnik  
Zaloška 59  
1000 Ljubljana  
Tel. +386 1 230 9730  
Fax +386 1 230 9778  
e-mail: [gp.ip@ip-rs.si](mailto:gp.ip@ip-rs.si)  
Sito web: <https://www.ip-rs.si/>

**Spain Agencia de Protección de Datos**

C/Jorge Juan, 6  
28001 Madrid  
Tel. +34 91399 6200  
Fax +34 91455 5699  
e-mail: [internacional@agpd.es](mailto:internacional@agpd.es)  
Sito web: <https://www.agpd.es/>

**Sweden Datainspektionen**

Drottninggatan 29

5th Floor  
Box 8114  
104 20 Stockholm  
Tel. +46 8 657 6100  
Fax +46 8 652 8652  
e-mail: [datainspektionen@datainspektionen.se](mailto:datainspektionen@datainspektionen.se)  
Sito web: <http://www.datainspektionen.se/>

United Kingdom

**The Information**

**Commissioner's Office**

Water Lane, Wycliffe House

Wilmslow - Cheshire SK9

5AF

Tel. +44 1625 545 745

e-mail:

[international.team@ico.org.uk](mailto:international.team@ico.org.uk)

Sito web: <https://ico.org.uk>