Privacy Policy

This Application collects some Personal Data from its Users.

This document can be printed using the print command in any browser settings.

Data Controller

ITER IDEA SRL, Via Brigata Reggio 24, 42124 Reggio Emilia, IT Indirizzo email del Titolare: info@iter-idea.com

Types of Data collected

The Personal Data collected by this Application, independently or through third parties, are: Usage data, e-mail, first name, last name, image, payment information, billing address; Tracking Tools; password.

Complete details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the data is collected.

The User may freely provide Personal Data or, in the case of Usage Data, collected automatically when using this Application. Unless otherwise specified, all Data requested by this Application are mandatory. If the User refuses to communicate with them, it may be impossible for this Application to provide the Service.

Whether this Application indicates some Data as optional, Users are free to refrain from communicating such Data without any consequence on the availability of the Service or its operation.

Users who have doubts about which Data are mandatory are encouraged to contact the Owner.

Any use of Cookies - or other tracking tools - by this Application or by the owners of third-party services used by this Application, unless otherwise specified, has the purpose of providing the Service requested by the User, in addition to further purposes described in this document and in the Cookie Policy, if available.

The User assumes responsibility for the Personal Data of third parties obtained, published or shared through this Application and guarantees that he has the right to communicate or disseminate them, freeing the Owner from any liability towards third parties.

Method and place of processing of the collected Data

Treatments

The Data Controller adopt the appropriate security measures to prevent unauthorised access, disclosure, modification or destruction of Personal Data.

The processing is carried out using IT and/or telematic tools, with organisational methods and logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other subjects involved in the organisation of this Application (administrative, commercial, marketing, legal, system administrators) or external subjects (such as third-party technical service providers, postal couriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, as Data Processors by the Data Controller. The updated list of Managers can always be requested from the Data Controller.

Legal basis of the treatment

The Data Controller processes Personal Data relating to the User if one of the following conditions exists:

- the User has given consent for one or more specific purposes; Note: in some jurisdictions, the Data Controller may be authorised to process Personal Data without the User's consent or another of the legal bases specified below, as long as the User does not object ("opt-out") to such treatment. However, this is not applicable if the processing of Personal Data is governed by European legislation on the protection of Personal Data;
- the processing is necessary for the execution of a contract with the User and/or for the execution of pre-contractual measures;
- the processing is necessary to fulfil a legal obligation to which the Data Controller is subject;
- the treatment is necessary for the execution of a task of public interest or for the exercise of public powers with which the Data Controller is invested:
- the processing is necessary to pursue the legitimate interest of the Data Controller or third parties.

It is always possible to ask the Data Controller to clarify the concrete legal basis of each treatment and in particular, to specify whether the treatment is based on the law, provided for by a contract or necessary to conclude a contract.

Location

The Data is processed at the Controller's operating offices and any other place where the parties involved in the processing are located. For more information, contact the Owner.

The User's Personal Data may be transferred to a country other than the one in which the User is located. To obtain further information on the place of processing, the User can refer to the section relating to the details on processing Personal Data.

The User has the right to obtain information regarding the legal basis for the transfer of Data outside the European Union or to an international organisation governed by public international law or constituted by two or more countries, such for example, the UN, as well as regarding the security measures adopted by the Data Controller to protect the Data.

The User can verify whether one of the transfers described above takes place by examining the section of this document relating to the details on the processing of Personal Data or request information from the Data Controller by contacting him at the details indicated at the beginning.

Period of retention

The Data are processed and stored for the time required by the purposes for which they were collected.

Therefore:

- Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until this contract is executed.
- Personal Data collected for purposes attributable to the Data Controller's legitimate interest will be retained until
 such interest is satisfied. The User can obtain further information regarding the legitimate interest pursued by the
 Data Controller in the relevant sections of this document or by contacting the Data Controller.
- When the treatment is based on the User's consent, the Owner can keep the Personal Data for longer until said consent is revoked. Furthermore, the Data Controller may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the Personal Data will be deleted. Therefore, upon the expiry of this term, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

Purpose of the processing of the collected data

The User's Data is collected to allow the Owner to provide the Service, fulfil legal obligations, respond to requests or executive actions, protect its rights and interests (or those of Users or third parties), identify any malicious activity or fraudulent, as well as for the following purposes: Hosting and backend infrastructure, Platform services and hosting, Contacting the User, Social features, Payment management, Interaction with external social networks and platforms and Registration and authentication.

To obtain detailed information on the purposes of the processing and the Personal Data processed for each purpose, the User can refer to the "Details on the processing of Personal Data" section.

Details on the processing of Personal Data

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

Contact the user

Mailing list or newsletter (this Application)

By registering with the mailing list or newsletter, the User's email address is automatically added to a list of contacts to which email messages containing information, including commercial and promotional information, relating to this Application may be sent. The User's email address could also be added to this list due to registering with this Application or after making a purchase.

Personal Data processed: surname, e-mail, first name.

Funzionalità social

Public profile (this Application)

Users can have a public profile viewable by other Users. In addition to the Personal Data provided, this profile may contain the User's interactions with this Application.

Personal Data processed: surname, image, first name.

Payment management

Unless otherwise specified, this Application processes all payments by credit card, bank transfer or other means through external payment service providers. In general, and unless otherwise stated, Users are requested to provide payment details and personal information directly to such payment service providers.

This Application is not involved in collecting and processing such information; instead, it will only receive a notification from the relevant payment service provider about the successful payment.

Stripe

Stripe is a payment service provided by Stripe Inc, Stripe Technology Europe Ltd or Stripe Payments Ltd, depending on how the Owner manages the processing of Data.

Personal Data processed: surname; e-mail, payment information, first name; various types of Data as specified in the privacy policy of the service.

Location of processing: United States - Privacy Policy; Ireland - Privacy Policy; United Kingdom - Privacy Policy.

Pavpal

Paypal is a payment service provided by PayPal Inc., which allows the User to make online payments.

Personal Data processed: surname, billing address; first name; various types of Data as specified in the privacy policy of the service.

Location of processing: Consult the Paypal privacy policy – Privacy Policy.

Hosting and backend infrastructure

This type of service has the function of hosting Data and files that allow this Application to function, allow its distribution and provide a ready-to-use infrastructure to deliver specific functions of this Application.

Some of the services listed below, if any, may operate on geographically distributed servers, making it difficult to determine the actual location where Personal Data is stored.

Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc. Personal Data processed: various types of Data as specified in the service's privacy policy.

Location of processing: Ireland – <u>Privacy Policy</u>; Italy – <u>Privacy Policy</u>.

Interaction with social networks and external platforms

This type of service allows you to interact with social networks or with other external platforms, directly from the pages of this Application.

The interactions and information acquired by this Application are, in any case, subject to the User's privacy settings relating to each social network.

This type of service could still collect traffic data for the pages where the service is installed, even when Users do not use it. Log out of the respective services is recommended to ensure that the data processed on this Application is not reconnected to the User's profile.

PayPal button and widget (Paypal)

The PayPal button and widget are services for interacting with the PayPal platform, provided by PayPal Inc. Personal Data processed: Usage data; tracking tools.

Location of processing: Consult the Paypal privacy policy – Privacy Policy.

Registration and authentication

By registering or authenticating, the User allows this Application to identify him and give him access to dedicated services. Depending on what is indicated below, the registration and authentication services could be provided with the help of third parties. If this happens, this Application will be able to access some Data stored by the third-party service used for registration or identification.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to learn more, please refer to the description of each service.

AuthO (AuthO, Inc)

AuthO is a registration and authentication service provided by AuthO, Inc. To simplify the registration and authentication process, AuthO may use third-party identity providers and store information on its platform.

Personal Data processed: surname; e-mail; image; first name; password; Tracking Tools; various types of Data as specified in the privacy policy of the service.

Location of processing: United States – Privacy Policy; European Union – Privacy Policy; Australia – Privacy Policy.

Google OAuth

Google OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Data Controller manages data processing and is connected to the Google network.

Personal Data processed: various types of Data as specified in the service's privacy policy.

Location of processing: United States – <u>Privacy Policy</u>: Ireland – <u>Privacy Policy</u>.

Login with Amazon (Amazon)

Login with Amazon is a registration and authentication service provided by Amazon.com, Inc. Personal Data processed: various types of Data as specified in the privacy policy of the service.

Location of processing: United States – <u>Privacy Policy</u>;

Platform services and hosting

These services are intended to host and operate key components of this Application, making it possible to deliver this Application from a single platform. These platforms provide the Owner with a wide range of tools, such as, for example, analytical tools for managing user registration, managing comments and the database, electronic commerce for processing payments, etc. The use of these tools involves the collection and processing of Personal Data.

Some of these services work through servers geographically located in different places, making it difficult to determine where personal data is stored.

App Store Connect (Apple Inc.)

This Application is distributed on the Apple App Store, a platform for distributing mobile applications provided by Apple Inc. App Store Connect allows the Owner to manage this Application on the Apple App Store. Depending on the configuration, App Store Connect provides the Owner with statistical data on user engagement and application discovery, marketing campaigns, sales, in-app purchases and payments to measure the application's performance. App Store Connect collects this data only from Users who have agreed to share it with the Owner. Users can find more information on how to opt-out through their device settings here.

Personal Data processed: Usage data.

Location of processing: United States – Privacy Policy.

Google Play Store (Google Ireland Limited)

This Application is distributed on the Google Play Store, a platform for distributing mobile applications provided by Google Ireland Limited. By being distributed through this app store, Google collects usage, and diagnostic data and shares aggregated information with the Owner. Much of this information is processed based on an opt-in statement. Users can disable this analysis function directly through their device settings. Learn more about how to manage your analytics settings on this page.

Personal Data processed: Usage data.

Location of processing: Ireland – Privacy Policy.

Further information on the processing of Personal Data

Push Notifications

This Application can send push notifications to the User to achieve the purposes described in this privacy policy. In most cases, Users can choose not to receive push notifications by consulting their device settings, such as notification settings for mobile phones, and then changing these settings for this Application for some or all applications on the device in question. Users should be aware that disabling push notifications may negatively affect this application's use.

Sale of goods and services online

The Personal Data collected is used for the provision of services to the User or for the sale of products, including payment and possible delivery. The Personal Data collected to complete the payment may be those relating to the credit card, the current account used for the transfer or other payment instruments provided. The Payment Data collected by this Application depends on the payment system used.

User Rights

Users can exercise certain rights concerning the Data processed by the Owner.

In particular, the User has the right to:

- withdraw consent at any time. The User can revoke the previously expressed consent to the processing of his Personal Data.
- oppose the processing of their Data. The User can object to the processing of their Data when it occurs on a legal basis other than consent. Further details on the right to object are set out in the section below.
- access their Data. The User has the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the Data processed.

- check and ask for rectification. The User can verify the correctness of his Data and request its updating or correction.
- obtain the limitation of the treatment. When certain conditions are met, the User can request the limitation of the
 processing of their Data. In this case, the Data Controller will not process the Data for any other purpose than their
 conservation.
- obtain the cancellation or removal of their Personal Data. When certain conditions are met, the User can request the cancellation of their Data by the Owner.
- receive their data or have them transferred to another owner. The User has the right to receive their Data in a
 structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain its
 transfer without obstacles to another holder. This provision is applicable when the Data are processed with
 automated tools and the processing is based on the User's consent, on a contract of which the User is a party or on
 contractual measures connected to it.
- propose a complaint. The User can lodge a complaint with the competent personal data protection supervisory authority or take legal action.

Details on the right to object

When Personal Data is processed in the public interest, in the exercise of public powers vested in the Data Controller or to pursue a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons connected with their particular situation.

Users are reminded that, should their Data be processed for direct marketing purposes, they may object to the processing without providing any reason. To find out if the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

How to exercise your rights

To exercise the User's rights, Users can direct a request to the contact details of the Owner indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible, in any case within a month.

Learn more about treatment

Defense in court

The User's Personal Data may be used by the Owner in court or the preparatory stages for its eventual establishment for the defence against abuse in this Application or related Services by the User.

The User declares to be aware that the Owner may be obliged to disclose the Data by order of the public authorities.

Specific information

At the User's request, in addition to the information contained in this privacy policy, this Application could provide the User

with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

System and maintenance logs

For needs related to operation and maintenance, this Application and any third-party services used by it may collect system

logs, i.e. files that record the interactions and which may also contain Personal Data, such as the User IP address.

Information not contained in this policy

For needs related to operation and maintenance, this Application and any third-party services used by it may collect system

logs, i.e. files that record the interactions and which may also contain Personal Data, such as the User IP address.

Response to "Do Not Track" requests

This Application does not support "Do Not Track" requests.

To find out if any third-party services support them, the User is invited to consult the respective privacy policies.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and,

if possible, on this Application as well as, if technically and legally feasible, by sending a notification to Users via one of the contacts you have. Therefore, please consult this page frequently, referring to the last modification date indicated at the

bottom.

If the changes concern treatments whose legal basis is consent, the Data Controller will collect the User's consent again, if

necessary.

Definitions and legal references

Personal Data (or Data)

Personal data is any information which, directly or indirectly, also in connection with any other information, including a

personal identification number, makes a natural person identifiable.

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Usage Data

This is information collected automatically through this Application (also from third-party applications integrated into this Application), including IP addresses or domain names of the computers used by the User who connects with this Application, addresses in URI notation (Uniform Resource Identifier), the time of the request, the method used to forward the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.) the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details relating to the itinerary followed within the Application, with particular reference the sequence of pages consulted, the parameters relating to the operating system and the User's IT environment.

User

The individual who uses this Application who, unless otherwise specified, coincides with the interested party.

Interested

The natural person to whom the Personal Data refer.

Data Processor (or Manager)

The natural person, legal person, public administration and any other body that processes personal data on behalf of the Data Controller, according to what is set out in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of processing personal data and the tools adopted, including the security measures relating to the functioning and use of this Application. Unless otherwise specified, the Data Controller is this Application's owner.

This Application

The hardware or software tool through which the Personal Data of Users are 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,	any	reference	to t	he	European	Union	contained	in	this	document	İS	intended	to	extend	to a	all
current member states of the European Union and the European Economic Area.																		

Cookie

Cookies are Tracking Tools that consist of small portions of data stored in the User's browser.

Tracking Tool

Tracker means any technology - e.g. Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - which allows tracking Users, for example, by collecting or saving information on the User's device.

Legal references

This privacy statement has been prepared based on multiple legislative systems, including articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy statement applies exclusively to this Application.

Last updated: September 13, 2022; effective from 13 September 2022.