

Privacy Policy

This Application collects some Personal Data from its Users.

Data Controller and Owner

Elma Italia Promotions S.r.l. Via della Pace, 40 19038 Sarzana (SP), elmaitaliapromotions@pec.it

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookie, Usage data, Geographic position, First Name, Username, Last Name, Address, Date of Birth, Phone number, Email address, Company name, Country, State, Province, Picture and City.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection. The Personal Data may be freely provided by the User, or collected automatically when using this Application. Any use of Cookies – or of other tracking tools – by this Application or by the owners of third party services used by this Application, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User. Failure to provide certain Personal Data may make it impossible for this Application to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

Place

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

Retention time

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

The use of the collected Data

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: SPAM protection, Backup saving and management, Analytics, Remarketing and Behavioral Targeting, Location-based interactions, Advertising, Displaying content from external platforms, Registration and authentication, Handling payments, Social features and Interaction with external social networks and platforms.

The Personal Data used for each purpose is outlined in the specific sections of this document.

Detailed information on the processing of Personal Data

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

- **Advertising**

These services allow User Data to be utilized for advertising communication purposes displayed in the form of banners and other advertisements on this Application, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Cookies to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.

Google AdSense (Google)

Google AdSense is an advertising service provided by Google Inc. This service uses the "DoubleClick" Cookie, which tracks use of this Application and User behavior concerning ads, products and services offered. Users may decide to disable all the Doubleclick Cookies by clicking on: [google.com/settings/ads/onweb/optout?hl=en](https://www.google.com/settings/ads/onweb/optout?hl=en).

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#)

- **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

User ID extension for Google Analytics (Google)

Google Analytics on this Application makes use of a feature called User ID. This setup allows for a more accurate tracking of Users by associating that User with the same ID over various sessions and devices. It is set up in a way that doesn't allow Google to personally identify an individual or permanently identify a particular device. The User ID extension might make it possible to connect Data from Google Analytics with other Data about the User collected by this Application. The opt-out link below will only opt you out for the device you are on, but not from tracking performed independently by the Owner. Contact the Owner via the email address provided in this privacy policy to object to the aforementioned tracking as well.

Personal Data collected: Cookie.

Place of processing : USA – [Privacy Policy](#) – [Opt Out](#)

Display Advertising extension for Google Analytics (Google)

Google Analytics on this Application might use Google's Interest-based advertising, 3rd-party audience data and information from the DoubleClick Cookie to extend analytics with demographics, interests and ads interaction data.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#) – [Opt Out](#)

Google Analytics (Google)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#) – [Opt Out](#)

Google Analytics with anonymized IP (Google)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within Member States of the European Union or in other Contracting States to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the USA.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#) – [Opt Out](#)

Google Tag Manager (Google)

Google Tag Manager is an analytics service provided by Google, Inc.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#)

Analytics collected directly (This Application)

This Application uses an internal analytics system that does not involve third parties.

Personal Data collected: Cookie and Usage data.

- **Backup saving and management**
- **Displaying content from external platforms**

These services allow you to view content hosted on external platforms directly from the pages of this Application and interact with them. If a service of this kind is installed, it may still collect web traffic data for the pages where the service is installed, even when users do not use it.

Google Fonts (Google)

Google Fonts is a typeface visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#)

Google Maps widget (Google)

Google Maps is a maps visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#)

- **Handling payments**

Payment processing services enable this Application to process payments by credit card, bank transfer or other means. To ensure greater security, this Application shares only the information necessary to execute the transaction with the financial intermediaries handling the transaction. Some of these services may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.

PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments using their PayPal credentials.

Personal Data collected: Various types of Data as specified in the privacy policy of the service.

[Privacy Policy](#)

Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

Personal Data collected: Various types of Data as specified in the privacy policy of the service.

Place of processing : USA – [Privacy Policy](#)

- **Interaction with external social networks and platforms**

These services allow interaction with social networks or other external platforms directly from the pages of this Application. The interaction and information obtained by this Application are always subject to the User's privacy settings for each social network. If a service enabling interaction with social networks is installed it may still collect traffic data for the pages where the service is installed, even when Users do not use it.

Facebook Like button and social widgets (Facebook)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook Inc.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#)

Linkedin button and social widgets (Linkedin)

The Linkedin button and social widgets are services allowing interaction with the Linkedin social network provided by Linkedin Inc.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#)

Google+ +1 button and social widgets (Google)

The Google+ +1 button and social widgets are services allowing interaction with the Google+ social network provided by Google Inc.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#)

- **Location-based interactions**

Geolocation (This Application)

This Application may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by this Application.

Personal Data collected: Geographic position.

Non-continuous geolocation (This Application)

The geographic location of the User is determined in a manner that isn't continuous, either at the specific request of the User or when the User doesn't point out their current location in the appropriate field and allows the application to detect the position automatically.

Personal Data collected: Geographic position.

- **Registration and authentication**

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third party services, for registration or identification purposes.

Google OAuth (Google)

Google OAuth is a registration and authentication service provided by Google Inc. and is connected to the Google network.

Personal Data collected: Various types of Data as specified in the privacy policy of the service.

Place of processing : USA – [Privacy Policy](#)

Stripe OAuth (Stripe Inc)

Stripe OAuth is a registration and authentication service provided by Stripe, Inc. and is connected to the Stripe network.

Personal Data collected: Various types of Data as specified in the privacy policy of the service.

Place of processing : USA – [Privacy Policy](#)

- **Remarketing and Behavioral Targeting**

These services allow this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User. This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity.

Facebook Remarketing (Facebook)

Facebook Remarketing is a Remarketing and Behavioral Targeting service provided by Facebook Inc. that connects the activity of this Application with the Facebook advertising network.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – [Privacy Policy](#)

- **Social features**

Public profile (This Application)

Users may have public profiles that other Users can display. In addition to the Personal Data provided, this profile may contain Users' interactions with this Application.

Personal Data collected: Address, City, Company name, Country, Date of Birth, Email address, First Name, Geographic position, Last Name, Phone number, Picture, Province, State and Username.

- **SPAM protection**

These services analyze the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

Akismet (Automattic Inc.)

Akismet is a SPAM protection service provided by Automattic Inc.

Personal Data collected: Various types of Data as specified in the privacy policy of the service.

Place of processing : USA – [Privacy Policy](#)

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services. The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

System Logs and Maintenance

For operation and maintenance purposes, this Application and any third party services may collect files that record interaction with this Application (System Logs) or use for this purpose other Personal Data (such as IP Address).

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

The rights of Users

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Application does not support “Do Not Track” requests. To determine whether any of the third party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller removes the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

Information about this privacy policy

The Data Controller is responsible for this privacy policy, prepared starting from the modules provided by Iubenda and hosted on Iubenda’s servers.

Definitions and legal references

Personal Data (or Data)

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

Usage Data

Information collected automatically from this Application (or third party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the

request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refer.

Data Subject

The legal or natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

Data Controller (or Owner)

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The hardware or software tool by which the Personal Data of the User is collected.

Cookie

Small piece of data stored in the User's device.

Legal information

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations under Art. 10 of EC Directive n. 95/46/EC, and under the provisions of Directive 2002/58/EC, as revised by Directive 2009/136/EC, on the subject of Cookies.

This privacy policy relates solely to this Application.