

# Information Concerning Personal Data Processing

In-es.artdesign srls (legal offices located on Piazza della Suburra, 6 00184 Rome Italy, herein referred to as In-es.artdesign srls, is constantly working to conform to the GDPR 2016/679 regarding their users personal data. This document will help you familiarize with their personal data protection policies and how your personal information is managed while you are using our services. It also permits you to express informed consent when providing your personal information in parts of the website that require it, as well as how that information is treated. In-es.com, herein referred to as the site, has areas requesting personal data that are published in accordance with art. 13 of EU Regulation 2016/679, that must be visualized before providing the data. Your information and data, provided or collected during the registration of In-es.artdesign's varying services, will be treated according to the Regulation and privacy obligations undertaken by In-es.artdesign srls. According to the Regulation, In-es.artdesign srls treatment of data will be marked by lawfulness, correctness, transparency, limitation and retention of purpose, data minimization, accuracy, integrity and confidentiality.

## 1- Processing Purposes

Our intended treatments, with explicit consent where necessary, meet the following purposes:

- a. provide requested services and the subsequent operational, technical and administrative management of that service and established relationship as well as communications relating to said relationship's progress;
- b. consent to navigate and consult In-es.artdesign's websites;
- c. respond to requests for information or assistance received via email, telephone, or form;
- d. fulfill legal, financial and/or tax obligations;
- e. send direct sales offers for previously, explicitly authorized services via email;
- f. f. conduct studies, research and gather market statistics; send advertisements, information, sales information, and surveys to better services (Customer Satisfaction) via email or text message, and/or telephone operator, and/or using the Site's official pages and social media channels, all with previous explicit consent;
- g. g. make personalized sales offers based on previous purchases or previous navigation of the Site; if you previously searched for certain products on the Site, you will receive offers concerning those products. This type of analysis typically uses purchase data relating to both individuals and legal entities and correlating decisions are not only based on automatic treatment.

## 2- The Legal Basis and Mandatory or Optional Nature of Processing

The legal base of Personal Data processing, as referred to in the GDPR's section 1 (a)(b)(c) and art. 6.1.b, is necessary for contracted services. Processing consent for these purposes is optional, but may inhibit the activation or requested services.

Section 1(d) represents the legitimate processing of Personal Data pursuant to art. 6.1.c of the Regulation. Once personal data has been provided, processing may be necessary to comply with the legal obligations In-es.artdesign srls is subject to.

Sections 1 (e)(f) represents processing for Marketing purposes pursuant to art. 6.1.c of the

Regulation. Providing personal data for these purposes is fully optional and will not inhibit the use of any services.

Section 1(g) represents email marketing based on previously purchased products or services, and has legal basis pursuant to 6.1.f of the Regulation. With In-es.artdesign's legitimate interest in promoting its products and services, the user can expect reasonable processing, to which he can oppose at any time. You can oppose the processing of your personal data for marketing purposes, as stated by Sections 3(e)(f)(g), by using the mechanism in the sales email's footer, or by writing directly to [info@in-es.com](mailto:info@in-es.com)

### **3- Types of Personal Data processed**

Personal data processing signifies any operation or set of operations performed with or without the use of automated processes, including the collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of sharing, comparison or interconnection, limitation, cancellation or destruction, to personal data or sets of personal data.

We would like to inform you that personal data -also based on your decisions on how you use our services- is defined by an identifier such as name, email address, an identification number, location data, an online identifier, purchases made, and other suitable identifiable data, depending on the type of service requested ( hereinafter only "Personal Data"). The Site processes the following data in particular:

#### **a. Navigational Data**

During normal function, the computer system and software used to operate the Site acquire Personal Data whose transmission is implicit in the use of Internet communication protocols. This information is not intended to identify interested parties, but by nature through the elaboration and association of third parties, could identify users. IP addresses, domain names of computers connecting to the Site, URI (Uniform Resource Identifier) addresses of requested resources, time of request, method used to submitting request to the server, size of the file obtained in response, the numerical code indicating the status of the response given by the server (success, error, etc.) and other parameters related to the operating system and the user's computer environment. This data is used for the sole purpose of obtaining anonymous statistical information on Site use and customers' sites, to check function, to identify anomalies and / or abuse; it is deleted immediately after processing.

#### **b. Data voluntarily provided by the user**

When using certain services, like registering for a newsletter, data processing may be carried out by a third party when you provide personal information to the service provider. In respect to this, you become the independent data controller, assuming all the legal obligations and responsibilities.

In this sense, you forgo any dispute, claim, request for damage compensation, etc. should your Personal Data be violated by third parties processing it while using In-es.artdesign srls' services. In every case, when you provide or process data through third parties while using services, assuming all related liability, this hypothetical treatment is based on a suitable legal basis (for example, the consent of the interested party) pursuant to art. 6 of the Regulation, legitimizing the processing of the information in question.

## 4- Cookies

# Cookie Policy

## Use of cookies

In-es.com uses cookies to make their services and user visits more simple and efficient. Site users will note small amounts of device (computer or mobile) data (Cookies) saved in the user's browser directory. Cookies are small files registered on the user's computer or mobile device after visiting a site, tailoring successive visits to the user's previous preferences and actions. Cookies enable the site to recall login information, preferred language, font size, display settings, etc, so that the user does not have to when revisiting the site or navigating from page to page. Cookies are therefore used to authenticate information, monitor visits and memorize information during user activity, tracing their site-navigation in order to obtain a unique identificative user code that aids in statistical or marketing objectives. While navigating the site, the user may receive cookies from sties or servers not part of the one they are visiting on their computer or mobile device (Third Party Cookies). Certain actions cannot be completed without using cookies, as they are technically necessary for certain actions performed by the site.

Cookies exist in varying forms, depending on their characteristics and functions, lasting varying periods of time on the user's computer or mobile device. Session cookies are automatically cancelled when the browser is closed. Persistent cookies remain in the user's device until a a pre-established deadline.

According to current legislation (EU Regulation 2016/679, Legislative Decree 196/2003), user consent is always not required when using cookies. Technical cookies, in particular, do not require consent; technical cookies serve the sole purpose of transmitting communications to a network, or providing the user with services they explicitly requested. In other words, cookies that are essential to the site's function or the user's requested activities.

Technical cookies not requiring consent from the user include:

- Analytics Cookies are used directly by the site manager to gather anonymous data on user numbers and behavior;
- Navigation or Session cookies for authentication;
- Functional cookies allow the user to navigate using selected criterium (language, selected products), with the objective of improving user navigation.

Profiling cookies require consent. They are used to select on-site advertisements based on the user's navigation profile.

## Types of Cookies

### Technical Cookies

These cookies allow certain parts of the site to work correctly. There are two categories; persistent and session.

- Persistent cookies are not cancelled when the browser is closed, and instead remain until a pre-established deadline
- Session cookies are cancelled every time the browser is closed

These cookies are sent and used with every visit to ensure the correct display and use of available services on the site, unless the user modifies their browser settings (thus disrupting image display on the site).

## **Analytics cookies**

Analytics cookies provide information concerning site use. in-es.com uses the anonymous statistical analysis to improve site use and to improve content provided and desired by users. These cookies only collect anonymous activity data, including how the user found the site. Analytics cookies are sent from the site itself, or from third party sites.

## **Analytics cookies from third party site services**

Analytics cookies from third party site services are cookies that collect anonymous usage information from other sites: pages visited, time spent, site traffic origins, location, age, sex and general interests, all used for advertising purposes.

## **Third party cookies integrate products and software services created by third parties**

Third party cookies integrate products and software services created by third parties within the site, using either icons or social network advertising that provoke content sharing or use of software services (including those that produce maps or offer additional services). These cookies arrive via third party domains or partner sites offering their functions within the [in-es.com](http://in-es.com)'s pages.

## **Profiling cookies**

Profiling cookies create a user profile based upon their expressed preferences on in-es.com in order to send them advertisement. The site is not required by law to ask consent for technical cookies, as they are necessary for requested services.

For all other types of cookies, the user can provide consent by doing one or more of the following:

- By modifying browser or navigation specifications related to in-es.com
- By modifying third party services

Both actions may prevent the user from viewing parts of the site.

## **How to disable cookies by modifying the browser**

If you would like to learn more about how your browser stores cookies during your browsing, please follow these links on the websites of the respective suppliers.

- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Internet Explorer / Microsoft Edge](#)
- [Safari 6/7 Mavericks](#)
- [Safari 8 Yosemite](#)
- [Safari su iPhone, iPad, o iPod touch](#)

## **List of Cookies:**

## Statistics

Cookie type and owner	Technical Name and type	Function and Objective	Duration
In-es.com	PHPSESSID / HTTP	PHP generic session cookie	Session
In-es.com	YSC / HTTP	YouTube session cookie	Session
In-es.com	GPS / HTTP	Google cookie	Session
In-es.com	<u>VISITOR_INFO1_LIVE</u> /HTTP	YouTube cookie	179 days
In-es.com	PREF / HTTP	YouTube cookie	243 days

## Websites and third party services

In-es.com may contain links to other sites that have diverse privacy policies; In-es.artdesign srls claims no connection to these policies.

## 5- Recipients of Personal Data

Your personal data may be, for the purposes outlined in section 1 above, shared with:

- a. a. subjects typically serving as data controllers, that is:
  - I. professionals or companies that provide assistance and advice to In-es.artdesign srls' accounting, administrative, legal, tax, financial and debt collection departments regarding Services;
  - II. subjects who perform technical maintenance (including network equipment and electronic communications network maintenance);
- b. b. professionals, groups and authorities who must communicate their personal data in accordance with legal or authoritative orders (for example, criminal investigations, or if In-es.artdesign is required by law to provide telephone logs);
- c. c. subjects delegated by In-es.artdesign srls to perform activities tightly connected to Services, committed to confidentiality or with the appropriate legal obligation of confidentiality, such as In-es.artdesign srls' employees and collaborators;

The complete list of data handlers can be obtained by request by writing [info@in-es.com](mailto:info@in-es.com)

## 6- Transfer of Personal Data

In-es.artdesign srls does not share any personal data with recipients outside the European Economic Area.

## 7- Retention Period

Obligatory contractual and financial data is kept until the conclusion of the financial sales interaction. In any case, In-es.artdesign srls will process Personal Data up to the time allowed by

Italian law to protect its interests when providing services.

For the purposes named in sections 3 (e)(f)(g), your Personal Data will be retained until you expressly revoke your consent In-es.artdesign srls will retain your Personal Data up to the time allowed by Italian law to protect its interests (Art. 2947(1)(3) c.c.).

## **8- User Rights**

Pursuant to European Regulation 679/2016 (GDPR) and national legislation, the interested party may, in accordance with the procedures and within the limits established by current legislation, exercise the following rights:

- request confirmation that their personal data has been registered;
- understand the origins of registration;
- receive information concerning the logic, use and purpose of the proc;
- request an update, rectification, integration, cancellation, transformation into anonymous user, block data processed in violation of the law, including that no longer in use for original purposes;
- in cases of consent-based processing, receive the data they provided in a structured and readable form by a data processor and in a format commonly used by an electronic device;
- in cases of consent-based processing, receive the data they provided in a structured and readable form by a data processor and in a format commonly used by an electronic device;

To assert your rights, please write to [info@in-es.com](mailto:info@in-es.com)

## **10- Modifications**

This Privacy Policy is valid as of May 25, 2018. In-es.artdesign srls. reserves the right to modify or simply update its content, partially or completely, also based upon variations of the applied regulation. The moment that these modifications are substantial and could have a relevant effect on users, In-es.artdesign srls will be sure to update them.