
Privacy policy

1. Introduction

- 1.1. This policy applies where we are acting as a data controller with respect to the personal data of service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.2. In this policy, "we", "us" and "our" refer to Alias srl

2. How we use your personal data

- 2.1. In this Section 3 we have set out:
 - a) the general categories of personal data that we may process;
 - b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 - c) the purposes for which we may process personal data; and
 - d) the legal bases of the processing.
- 2.2. We may process data about your use of our services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is monitoring and improving our website and services.
- 2.3. We may process your account data ("account data"). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The

legal basis for this processing is consent the proper administration of our website and business.

- 2.4. We may process your information included in your personal profile on our website ("profile data"). The profile data may include your name, address, telephone number, email address. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent the proper administration of our website and business.
- 2.5. We may process your personal data that are provided in the course of the use of our services ("service data"). The service data may include your email address and telephone number. The source of the service data is you or your employer. The service data may be processed for the purposes providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.6. We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and the user of the software.

3. Amendments

- 3.1. We may update this policy from time to time by publishing a new version on our website.

- 3.2. You should check this page occasionally to ensure you are happy with any changes to this policy.

4. Your rights

- 4.1. In this section, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 4.2. Your principal rights under data protection law are:
- a) the right to access;
 - b) the right to rectification;
 - c) the right to erasure;
 - d) the right to restrict processing;
 - e) the right to object to processing;
 - f) the right to data portability;
 - g) the right to complain to a supervisory authority; and
 - h) the right to withdraw consent.
- 4.3. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.
- 4.4. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the

processing, to have any incomplete personal data about you completed.

- 4.5. In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 4.6. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 4.7. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued

by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

4.8. To the extent that the legal basis for our processing of your personal data is:

a) consent; or

b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 4.9. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 4.10. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 4.11. You may exercise any of your rights in relation to your personal data by written notice to us.

5. Our details

ALIAS SRL
via Cennano, 31
52025 Montevarchi (AR)
email: privacy@alias2k.com

6. Data protection officer

- 6.1. Our data protection officer's contact details are:
Stefano Beccastrini – stefano.beccastrini@alias2k.com