

## OUR PRIVACY POLICY

This information is provided - **also in pursuance of the EU Regulation 2016/679** concerning the processing of personal data under the General Data Protection Regulation (GDPR)

- to any entity having to do with the web-based services that are made available by Soevermedia Srl via electronic networks as from the following address:

*www.soevermedia.com*

which corresponds to the home page of our official web site,

and the following blog:

*blog.soevermedia.com*

which is the official Soevermedia Srl blog.

The information provided only applies to our web site and does not concern any web sites that may be visited by a user via external links.

The information provided is also based on the guidelines contained in the Article 29 Working Party Guidelines on consent under Regulation 2016/679, which was Adopted on 28 November 2017 and as last Revised and Adopted on 10 April 2018 by the European data protection authorities in order to lay down requirements for the collection of personal data online - especially with regard to arrangements, timing and contents of the information to be provided by data controllers to users visiting web pages for whatever purpose.

### **Data Controller**

Visiting the Soevermedia Srl website and blog may result into the processing of data concerning identified or identifiable persons.

The data controller is Soevermedia Srl, with registered office in Milan (Italy), Via G.B. VICO, 16/A – 20123, in person of its legal representative Laura Ronchi, CEO. The email address for any communication about this document is [privacy@soevermedia.com](mailto:privacy@soevermedia.com).

## **Place Where Data Is Processed**

The processing operations related to the web-based services that are made available via this website are carried out at the aforementioned office of Soevermedia Srl exclusively by technical staff in charge of said processing, or else by persons tasked with such maintenance activities as may be necessary from time to time.

No data resulting from web-based services is either communicated or disseminated.

## **Categories of Processed Data**

### *Navigation Data*

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols.

Such information is not collected in order to relate it to identified data subjects, however it might allow user identification per se after being processed and matched with data held by third parties.

This data category includes IP addresses and/or the domain names of the computers used by any user connecting with this web site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment.

These data are used to extract statistical information on website and app use as well as to check functioning. The data might be used to establish liability in case computer crimes are committed against the website.

### *Cookies*

Our website soevermedia.com and our blog blog.soevermedia.com use the Google Analytics and AdWords technologies and their cookies, files that are memorized on users' computers in order to optimize their experience and analyze their usage of the website.

Cookies are used by third parties (here: Google) to track the users' IP address, browser, operative system and URLs.

Data collected through the Google Analytics and AdWords technologies are kept for no more than 26 months and will be deleted after the end of that period of time. If and when a user accesses the Soevermedia website or blog, the period above is re-set to 26 months from that access moment.

If you don't want the above cookies to be memorized, please read below:

*All browser technologies enable you to manage the cookies in the cookie folder of your web browser. This means that you can either delete cookies from your cookie folder once you have finished your visit at our website or you can set your preferences with regard to the use of cookies before you begin browsing our website. Please note that deleting or rejecting cookies may adversely affect your user experience of our website.*

#### *Data Provided Voluntarily by Users*

Registering or log in on the website and app, which is done on the basis of a freely chosen, explicit, and voluntary option, entails acquisition of the subject's details, which are necessary in order to identify, notify and give access to features of the website.

Providing data is mandatory for the use of certain features of the [www.soevermedia.com](http://www.soevermedia.com) website. If users do not agree to provide data, the app and certain features of the website cannot be used.

#### **Processing Arrangements**

Personal data is processed with automated means for no longer than is necessary to achieve the purposes for which it has been collected. Personal data used to access the [www.soevermedia.com](http://www.soevermedia.com) website is processed as long as the user needs to access the [www.soevermedia.com](http://www.soevermedia.com) website. Personal data is deleted upon user request.

We also use other software to maintain and process User data, so that we can manage our business relationships.

This other software includes Mailchimp for keeping users updated about what we do and a custom built CRM (customer relationship management) tool that is necessary for doing business with our clients.

Once the User provides acceptance of this privacy policy, he/she also gives permission to store his/her data into our CRM. A separate permission has to

be given for receiving marketing communications via the aforementioned Mailchimp software.

Specific security measures are implemented to prevent the data from being lost, used unlawfully and/or inappropriately, and accessed without authorization.

## **Data Subjects' Rights**

Data subjects are entitled at any time to obtain confirmation of the existence of personal data concerning them and be informed of their contents and origin, verify their accuracy, or else request that such data be supplemented, updated or rectified (Article 7(3) of the GDPR). Specifically:

- *Right to rectification:* You may access and update your Soevermedia account settings at any time to correct or complete your account information.
- *Right to be forgotten:* You may terminate your MailChimp account at any time, in which case we will permanently delete your account and all data associated with it.

The above Article also provides for the right to request erasure, anonymity or blocking of any data that is processed in breach of the law as well as to object in all cases, on legitimate grounds, to processing of the data. Specifically:

All privacy requests should be emailed to [privacy@soevermedia.com](mailto:privacy@soevermedia.com) or sent by post to the Italian Soevermedia Srl office (Via G.B. Vico, 16/A – 20123 – Milano - Italy).

It is hereby specified that this document as posted at

<http://www.soevermedia.com/common/pdf/privacy.pdf>

is the privacy policy of the Soevermedia Srl website, [www.soevermedia.com](http://www.soevermedia.com) and the Soevermedia Srl blog, [blog.soevermedia.com](http://blog.soevermedia.com) and will be updated as necessary.