

**Privacy Policy** of [www.shsitalia.it](http://www.shsitalia.it) and [www.shsitalia.net](http://www.shsitalia.net)

This Application collects some personal data from its users.

**Data Controller** SHS Srl, via F.lli

Rosselli 29, Rescaldina (MI).

Owner's email address: [shsbox@shsitalia.it](mailto:shsbox@shsitalia.it)

### **Types of Data collected**

Among the Personal Data collected by this Application, independently or through third parties, there are: name; surname; e-mail; Cookies; Usage Data; website; various types of data.

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.

Personal Data may be freely provided by the User 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 them, it may be impossible for this Application to provide the Service. In cases where this Application indicates some Data as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or on 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**

#### **Processing methods**

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

The processing is carried out using IT and/or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other subjects involved in the organization 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 in the event that 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 authorized 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 fulfill 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 for the pursuit of the legitimate interest of the Data Controller or of third parties. However, 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.

#### **Place**

The Data is processed at the Data Controller's operating offices and in 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 the processing of 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 organization governed by public international law or constituted by two or more countries, such as for example the UN, as well as regarding the security measures adopted by the Data Controller to protect the Data.

The User can check 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.

#### **Retention period** 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 the execution of this contract is completed.

Personal Data collected for purposes attributable to the legitimate interest of the Data Controller 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 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 Data collected**

The User Data is collected to allow the Owner to provide its Services, as well as for the following purposes: Comment on the contents, Contact the User, Interaction with social networks and external platforms, Statistics, Protection from SPAM, Displaying content from external platforms and Data Transfer outside the EU.

To obtain further detailed information on the purposes of the processing and on the Personal Data concretely relevant for each purpose, the User can refer to the relevant sections of this document.

#### **Details on the processing of Personal Data**

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

Content commenting

Contact the user

Interaction with social networks and external platforms

Protection from SPAM

Statistics

Data transfer outside the EU Viewing

content from external platforms User rights Users  
can exercise

certain rights with reference to 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 holder. The User has the right to receive his Data in a structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain the 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 to it connected.

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 your rights, Users can send 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.

### **Cookie Policy**

This Application uses Cookies. To find out more and to view the detailed information, the User can consult the Cookie Policy.

### **Further information on processing**

#### **Defense in court**

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its eventual establishment for the defense against abuse in the use of 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 request of the User, 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 log and maintenance**

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**

Further information in relation to the processing of Personal Data may be requested at any time from the Data Controller using the contact details.

### **Response to “Do Not Track” requests**

This Application does not support “Do Not Track” requests.

To find out if any third-party services used 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 informing Users on this page and, if possible, on this Application as well as, if technically and legally feasible, by sending a notification to Users through one of the contact details held by the Owner. Therefore, please consult this page regularly, referring to the date of the last modification 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.