

Privacy Policy

Sumoto srl., with registered office in Via Peripoli 1-3 – 36075 Montecchio Maggiore (VI) hereinafter, "**Company**", "**we**" and "**our**"), in its capacity of data controller, undertakes to protect user privacy. This privacy policy ("**Privacy Policy**") applies only to the website www.sumoto.com . and to any other website or service controlled by the Company in which the Privacy Policy is published or referred to (hereinafter, the "**Website**").

Please read the Privacy Policy carefully before using the Website.

1. The Website

The main purpose of the Website is to present the Company's services and products, providing detailed information to users, also following a request from the same. This Privacy Policy describes how we collect, use and share the personal data we obtain as a result of the use of the Website by users.

Since the Company reserves the right to add or remove functionalities from the Website at any time and to change the services and/or products offered, the Privacy Policy can be updated at any time by the Company and any changes made will be communicated to Website users and visitors. Since the Website could allow access to websites owned and operated by third parties, it should be noted that the Privacy Policy does not apply to such third party websites and the Company is not responsible for the protection of personal data by such third parties.

2. The data processed

Data provided voluntarily by the user. The Company may collect the following personal data provided voluntarily by the user:

- user's name and surname,
- his/her domicile or residence address,
- his/her e-mail address and telephone number,
- details of the services and/or products for which the information is requested.

The collection may take place, for example, when the user contacts us for information with reference to our services and/or products.

If the user provides us with personal data of third parties, the user must ensure that the communication of the data to the Company and our subsequent processing for the purposes specified in this Privacy Policy take place in compliance with applicable legislation and therefore, for example, before providing us with personal data of third parties, the user must inform them and obtain their consent to processing, if required by the aforementioned legislation.

Browsing data. Browsing data includes all data collected automatically through the Website and concerns, for example, the types of actions carried out on the Website by the user and how the user is using the Website. In addition, we may automatically register the IP address (that is, the unique address that identifies the user's device on the Internet), which is automatically recognised by our server. Except for express consent of the user for the purposes described in point 3.B, browsing data is used for the sole purpose of obtaining anonymous statistical information on the use of the Website and to verify its proper functioning and is deleted immediately after processing. This data could also be used to ascertain liability in the event of any cyber crimes against the Website or to protect our rights.

3. Purposes and legal grounds for processing
Purposes
<p>A. The Company processes the user's personal data to send the user promotional information regarding the Company's services and/or products and/or those of third parties, to send invitations to the Company's events and/or those of third parties and to carry out market surveys using automated (e-mail, text message, mms, fax, autoresponders) and non-automated (post, telephone with operator) tools, without prejudice to the possibility for the user to object to the sending of such communications at any time, also being able to select with which tools to be contacted or not.</p>
<p>B. The Company processes the user's personal data for profiling purposes for advertising and/or commercial purposes, in order to customise the services based on the particularities of the user and, for example, to present content in line with his/her interests and to develop services increasingly meeting his/her needs. The user has the right to withdraw his/her consent at any time.</p>
<p>C. The Company processes the user's personal data to ensure that the Website is up to date and meets users' needs, to analyse, review and improve the products or services offered on the Website, to provide users with a user-friendly Website browsing experience, to ensure compliance with the terms of use of the Website and the security of Website and of its users and to protect the Company's rights and/or property. The information used for this purpose will remain strictly anonymous and will not be used to identify any user nor will it be aggregated with the personal data of users.</p>
<p>D. The Company processes the user's personal data to fulfil obligations deriving from the law, regulations or EU legislation.</p>
4. Nature of provision of data and consequences of any refusal
<p>Providing data for the purposes set out in points, 3.B, 3B and 3.D is necessary and refusal by the user to do so implies the impossibility for the Company to perform its contractual obligations and provide the user with the functionalities, services and information requested as specified above.</p> <p>Providing data for the purposes referred to in points 3.A is optional and any refusal to do so by the user will not have any consequences on provision of the services, functionalities and information to the user requested via the Website.</p>
5. Data recipients
<p>Associated, subsidiary or parent companies. The Company communicates the personal data of users to its associated, subsidiary and parent companies, also located outside the European Union, where necessary to pursue the purposes described in this Privacy Policy.</p> <p>Third-party service providers. We share the personal data of users with third party service providers which will act as data processors in order to make use of the Website possible and/or receive services through the Website. By way of example, such third parties may include professionals, also in associated form, who provide technical, commercial or administrative advice to the Company for the pursuit of its business and the purposes described in this Privacy Policy,</p>

companies that deal with the management or maintenance of the IT infrastructure on which the Website is based, call center or pre- or post-sales support service providers, logistics operators should it be necessary to deliver a product to the user, as well as agencies specialised in the management of promotional and marketing services in the name and on behalf of the Company.

Third parties in compliance with a legal obligation or to protect the rights of the Company.

Communication of the personal data of users may take place vis-a-vis institutions, the police or judicial, administrative, regulatory or public security authorities, in the context of legal or administrative proceedings, or in order to fulfil a legal obligation or protect our rights, also in court.

Third parties in the event of corporate transactions. Communication of the personal data of users may take place in the presence of events such as mergers, sales of companies (or business units thereof) or other extraordinary transactions in which the Company may be required to share information with potential buyers or counterparties and their consultants.

6. Data of minors

The Company does not collect or intentionally retain the personal data of individuals under the age of 18, nor does it intentionally allow such minors to use the Website.

Users under the age of 18 are asked not to register on the Website and not to provide personal data.

7. Transfer abroad

The Company may need to transfer the personal data of users abroad to provide services to the user and to pursue the other purposes indicated in this Privacy Policy. Before proceeding with the transfer of data outside the European Union, it will adopt appropriate precautions, also of a contractual nature, provided for by the applicable privacy legislation, in order to guarantee the protection, security and confidentiality of the personal data transferred (for example, it will adopt the Standard Contractual Clauses envisaged by the European Commission).

8. Data retention

We retain the personal data of users only for the time strictly necessary in order to provide services or to achieve the purposes for which the data was collected, or to comply with legal obligations. For example, we retain the personal data necessary for the exercise of our rights of defence in the event of legal disputes, such as personal data relating to the provision of a service, up to a maximum of 10 years from the conclusion of the service, based on the standard limitation period provided for by the Italian Civil Code. After this period, the personal data will be deleted or rendered anonymous. In the event that we have collected personal data based on the user's consent and no longer have any other valid legal grounds to continue with its processing, if the user subsequently revokes his/her consent, we will delete the personal data covered by such revocation. Without prejudice to the foregoing, we retain the personal data of users collected in accordance with this Privacy Policy for the marketing purposes referred to in point 3.B for a period not exceeding 2 years from its collection and for profiling purposes referred to in point 3.C for a period not exceeding 12 months from its collection. After this period, the data will be deleted or rendered anonymous.

9. Cookies

Cookies are small files sent by the websites visited by users and stored on the device used to access such websites. When users visit the same website again, the browser reads the cookies stored on the device and retransmits the information to the website that originally created them. Also our Website uses various types of cookies and other technologies for reading and storing information on the user's device in order, for example, to perform statistical analyses, customise and facilitate the browsing experience of users and, with the prior consent of the user, offer you advertising based on the user's interests. We do not use cookies that have the ability to start programs on devices or to send viruses to them.

Our Website uses technical cookies, for which the user's consent is not required, which are necessary for the functioning of the Website, including provision of the services offered by the same. This category of cookies includes analytics cookies, i.e. session and functionality cookies used by the controller to, for example, collect information, in aggregate form, on the number of users and how they visit the website, to save the user's browsing preferences, such as the language, or to recognise users returning to the website.

Our Website also uses its own and third-party profiling cookies, aimed at creating profiles related to the user and used to send and display advertising messages in line with the preferences expressed by the same when browsing. The use of profiling cookies requires the consent of the user.

The aforementioned cookies can be temporary (when they are automatically deleted at the end of the session), permanent (when they remain stored on the user's hard disk, unless the user deletes them), first party (when they are set and managed directly by the site operator) and third party (when they are managed by a domain different from the one visited by the user).

Since most browsers are set to automatically accept cookies, we remind you that you can manage and disable cookies directly from the browser settings:

- Internet Explorer
- Google Chrome
- Safari
- Firefox

or through the portal www.youronlinechoices.com/it or by sending us an email to the address: info@sumoto.com

Below is the table with the cookies used on our Website.

Nature	Type and name	Duration
First-party cookies	<i>ct-ultimate-gdpr-cookie</i>	1 year
	Tecnico – pum-644	1 month
Third-party cookies	<i>Analytics - _ga</i>	2 years
	<i>Analytics - _gid</i>	1 day
	<i>Analytics - _gat_gtag_UA_115458038_1</i>	1 minute
Third-party links (only analytics)	https://support.google.com/analytics/answer/6004245?hl=it	

10. Data security

The Company adopts security measures in order to safeguard the confidentiality of users' personal data. Nevertheless, due to the nature of the Internet, continuous technological evolution and other factors beyond our control, the security of data transmission over the Internet cannot be fully guaranteed and, therefore, we cannot ensure or guarantee the security of the data and of the information that the user transmits to us and the user recognises and accepts that such transmission is at his/her own risk. Users are also recommend to take appropriate precautions when using the Website, such as keeping their login credentials strictly confidential and periodically changing them.

11. Privacy rights

Users have the right to access, rectify or delete the data stored by the company that concerns them, the right to object to, or restrict, certain types of processing (including the right to revoke their consent to processing previously provided), as well as to receive personal data concerning them in a structured and commonly used format readable by an automatic device (data portability right). Finally, users have the right to file a complaint with the competent Supervisory Authority. Exercise of the above rights is at no cost to the user but, should we consider exercise of the privacy rights by the user manifestly unfounded or excessive, we may reserve the right to charge such user a reasonable contribution for expenses to process the request. To exercise their privacy rights, as well as to request any information or clarification regarding this Privacy Policy, users can contact the Company at the following address: info@sumoto.com

