



## Privacy disclaimer

*This privacy policy aims to provide all information on the processing of personal data carried out by D-go when the user browses the website (as better indicated below).*

### 1. INTRODUCTION - WHO ARE WE?

Digitalgo S.p.A., with registered office in Piazzale Konrad Adenauer, 3 – 00144 Roma, Tax Code / VAT no. 02927500542 (hereinafter, “**Data Controller**”), owner of the internet site <http://www.d-go.it> (hereinafter, the “**Site**”), as **Data Controller** of the personal data of users who browse the site (hereinafter, “**Users**”) below provides the privacy policy pursuant to art. 13 of EU Regulation 2016/679 of 27 April 2016 (hereinafter, “**Regulation**”, or “**Applicable Law**”).

### 2. HOW TO CONTACT US?

The Data Controller takes the utmost account of the right to privacy and protection of personal data of its Users.

Users can contact the Data Controller at any time, using the following methods:

- By sending a registered letter with return receipt to the Data Controller's registered office in Piazzale Konrad Adenauer, 3 – 00144 Roma;
- By sending an email to the address: [info@d-go.it](mailto:info@d-go.it)

Users can also contact the Data Protection Officer (DPO) of the Data Controller, whose contact details are shown below: Lapo Curini Galletti, e-mail: [privacy@d-go.it](mailto:privacy@d-go.it)

### 3. WHAT DO WE DO? - PURPOSE OF THE PROCESSING

By browsing the Site, the User can always stay up to date regarding the services and activities developed by the Data Controller (hereinafter, “**Service**”). In relation to the activities that can be carried out through the Site, the Company collects personal data relating to Users.

This Site and any services offered through the Site are reserved for individuals who have reached the age of eighteen. The Data Controller therefore does not collect personal data relating to subjects under the age of



18. At the request of the Users, the Data Controller will promptly delete all personal data involuntarily collected and relating to subjects under the age of 18.

Users' personal data will be processed lawfully by the Data Controller pursuant to art. 6 of the Regulation for the following processing purposes:

- a) **supply of the service**, or to allow the User to browse the Site. The User data collected by the Data Controller for this purpose include all personal data whose transmission is implicit in the use of Internet communication protocols, which the computer systems and software procedures used to operate the Site acquire during their normal exercise: the IP addresses or domain names of the computers used by the Users, the addresses in URI (Uniform Resource Identifier), notation of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the User's IT environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to allow its correct functioning. Without prejudice to the provisions elsewhere in this privacy policy, in no case will the Data Controller make the Users' personal data accessible to other Users and / or third parties.
- b) **administrative and accounting purposes**, or to carry out organizational, administrative, financial and accounting activities, such as internal organizational activities and activities functional to the fulfillment of contractual and pre-contractual obligations;
- c) **legal obligations**, or to fulfill obligations established by law, by an authority, by a regulation or by legislation and for ascertaining responsibility in case of hypothetical computer crimes against the Site.

The provision of personal data for the aforementioned processing purposes is optional but necessary, since failure to provide them will make it impossible for the User to access the Site and use the Service.

#### 4. LEGAL BASIS

**Service provision** (as described in paragraph 3, letter a) above: the legal basis is art. 6 paragraph 1 lett. b) of the Regulation, or the processing is necessary for the execution of a contract of which the User is a party or for the execution of pre-contractual measures adopted at the request of the same.

**Administrative and accounting purposes** (as described in paragraph 3, letter b) above: the legal basis is art. 6, paragraph 1, lett. b) of the Regulation, as the processing is necessary for the execution of a contract and / or for the execution of pre-contractual measures adopted at the request of the User.



**Legal obligations** (as described in paragraph 3, letter c) above: the legal basis is art. 6, paragraph 1, lett. c) of the Regulation, as the processing is necessary to fulfill a legal obligation to which the Data Controller is subject.

## 5. PROCESSING METHODS AND DATA STORAGE TIMES

The Data Controller will process Users' personal data using manual and IT tools, with logic strictly related to the purposes themselves and, in any case, in order to guarantee the security and confidentiality of the data.

Users' personal data will be kept for the time strictly necessary to carry out the primary purposes (as described in paragraph 3 above), or in any case according to what is necessary for the protection in civil law of the interests of the Controller and Users.

## 6. SCOPE OF COMMUNICATION AND DISCLOSURE OF DATA

The employees and / or collaborators of the Data Controller in charge of managing the Site may become aware of the Customer's personal data. These subjects, who have been instructed to do so by the Data Controller pursuant to art. 29 of the Regulation, will process Users' data exclusively for the purposes indicated in this statement and in compliance with the provisions of the Applicable Law.

Third parties who may process personal data on behalf of the Data Controller as data processors pursuant to art. 28 of the Regulation, such as, by way of example, suppliers of IT and logistics services functional to the operation of the Data Controller Site, outsourced or cloud computing service providers, professionals and consultants.

The User has the right to obtain a list of any data processors appointed by the Data Controller, making a request to the Data Controller in the manner indicated in paragraph 7 below.

## 7. RIGHTS OF DATA SUBJECTS

The User can exercise the rights guaranteed by the Applicable Law at any time by contacting the Controller in the following ways:

- By sending an e-mail message to the Data Controller at the address: [info@d-go.it](mailto:info@d-go.it);
- By sending a registered letter with return receipt to the controller's registered office in Piazzale Konrad Adenauer, 3 – 00144 Roma.



Users can also contact the Data Protection Officer (DPO) of the Data Controller, whose contact details are shown below: Lapo Curini Galletti, e-mail: [privacy@d-go.it](mailto:privacy@d-go.it)

Pursuant to the Applicable Law, the User has the right to obtain an indication (i) of the origin of the personal data; (ii) the purposes and methods of processing; (iii) the logic applied in case of processing carried out with the aid of electronic instruments; (iv) the identity of the controller and processors; (v) the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as processors or authorized persons.

Furthermore, the User has the right to obtain:

- a) access, updating, rectification or, when interested, integration of data;
- b) the cancellation, transformation into anonymous form or limitation of processing of data processed in violation of the law, including those whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- c) the certification that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment occurs proves impossible or involves the use of means manifestly disproportionate to the protected right.

As well as:

- a) the right to withdraw consent at any time, if the processing is based on your consent;
- b) (if applicable) the right to data portability (right to receive all personal data concerning him in a structured format, commonly used and readable by automatic device), the right to limit the processing of personal data and the right cancellation ("right to be forgotten");
- c) the right to object:
  - i) in whole or in part, for legitimate reasons, to the processing of personal data concerning him, even if pertinent to the purpose of the collection;
  - ii) in whole or in part, to the processing of personal data concerning him for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication;



iii) if personal data are processed for direct marketing purposes, at any time, to the processing of data carried out for this purpose, including profiling to the extent that it is connected to such direct marketing.

d) if the User believes that the processing that concerns him violates the Regulation, the right to lodge a complaint with a Supervisory Authority (in the Member State where he usually resides, in the one where he works or in the one in which it occurred the alleged violation). The Italian Supervisory Authority is the Garante per la protezione dei dati personali, based in Piazza Venezia, n. 11, 00187 - Rome (RM) (<http://www.garanteprivacy.it/>).



The Data Controller is not responsible for updating all the *links* that can be viewed in this Policy, therefore whenever a *link* is not functional and / or updated, the User acknowledges and accepts that he must always refer to the document and / or section of the sites internet referred to by this *link*.