

Privacy Policy

Protecting Your Privacy is one of our main aims.

This information is provided, in compliance with articles 13 and 14 of EU Regulation 679/2016 (hereafter "Regulation"), to users (hereinafter: "Users") of the website in the desktop and mobile version, (hereinafter: "Website") owned by **GLAM srl**, VAT No. 08771740969, in the person of the legal representative pro-tempore, with registered office in Via Dell'Orso 9, 20121, Milan (MI), as Data Controller for personal data (hereafter: "Data Controller") and has the purpose of describing the methods of management of the Website with reference to the processing of personal data, as well as allowing users of the Site to know the purposes and methods of processing of personal data by the Data Controller in the event of their transfer.

This document will allow you to learn about our privacy policy to understand how your personal information is handled when you use our services and to allow you, where appropriate, to give your express and informed consent to the processing of your personal data, in the sections of the website where you are requested to provide personal data.

We remind you that in the various sections of the website www.superglamours.it where we collect your personal data, specific information is published pursuant to art. 13 of EU Regulation 2016/679 for your necessary inspection before the provision of the requested data. The information and data provided by you or otherwise acquired as part of the use of the various [superglamours.it](http://www.superglamours.it) services will be processed in compliance with the provisions of the Regulations and the confidentiality obligations. According to the rules of the Regulation, the processing performed by the Data Controller will be based on the principles of lawfulness, correctness, transparency, purpose limitation and retention, data minimisation, accuracy, integrity and confidentiality.

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1. Data Controller in charge of data processing

The Data Controller of the processing carried out within the Website is **GLAM srl**, VAT No. 08771740969, in the person of the legal representative pro-tempore, with registered office in Via Dell'Orso 9, 20121, Milan (MI).

The updated list of people in charge and staff involved in data processing is kept at the registered office of the Data Controller.

2. Personal data subject to the processing

The processing of personal data refers to any operation or set of operations performed on personal data or sets of personal data, with or without the aid of automated processes, such as collection, recording, organisation, structuring, retention, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or combination, restriction, elimination or destruction.

We inform you that the personal data being processed will consist of an identifier such as the name, email address, an identification number, location data, an online ID and other suitable data required to make it identified or identifiable, depending on of the type of services requested (hereafter only "**Personal data**").

The personal data processed through the Website are as follows:

a. Browsing data

During their normal operation, the computer systems and software procedures used to operate this Website acquire certain Personal Data, the transmission of which is implicit in the use of internet communication protocols. This information is not collected with the intent of associating it with identified users but, by its very nature, could lead to the identification of users through processing and association with data held by third parties. This category of data includes IP addresses or domain names of computers used by persons who connect to the Website, the URI (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the reply given by the server (successful, error, etc.) and other parameters regarding the user's operating system and computer environment. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the Website and the websites of our customers and to check its correct functioning, to identify anomalies and/or abuse, and is deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical cyber crimes to the detriment of the Website or third parties.

b. Data provided voluntarily by the interested party

The optional, explicit, voluntary sending of emails to the addresses provided on the Website implies the subsequent acquisition of the personal data supplied.

The inclusion of personal data to take advantage of the specific services offered by the Website (such as for the contact form, subscription to the newsletter or for the proposition of a candidacy) involves the acquisition of personal data provided.

In any case, specific information on the data provided will be contained with reference to specific services offered on the Website.

c. Registration data

The Website offers the possibility for users to register and create their own personal account in order to provide some additional services.

With regards to the processing of Personal Data carried out as part of the registration service, it is specified that the Data Controller will process only the strictly necessary procedures to provide the service, excepting further processing on the basis of an appropriate legal basis pursuant to art. 6 of the Regulations (for example the consent for sending newsletters). The data collected by the Data Controller as part of the registration request is only that strictly necessary for the provision of the service and includes:

- Name
- Surname
- Tax Code
- Email
- Password (chosen by the User)

The provision of such data is optional, however, without it being entered, the Data Controller cannot proceed with the creation of the account.

It should be noted that the Personal Data of the interested party, for purposes strictly related to the provision of the service, may be disclosed to third parties (for example, shippers, credit institutions, platforms for the management of online payments).

The User assumes the responsibilities for Personal Data of third parties published or shared by the Website, and guarantees that he/she has the right to disclose or disseminate such, releasing the Data Controller from any liability to third parties. In this sense, the User confers on the point the widest indemnity with respect to any objection, claim, request for compensation for damages from processing, etc. that should reach the Data Controller from third parties whose Personal Data have been processed through the use of the Services in violation of the rules on the protection of relevant Personal Data.

If the processing of Personal Data is based on the consent of the User, the latter can revoke it at any time. The Data Controller, as for their own responsibility, will not publish and will not disclose your personal data.

d. Social Network Plugin

This Website also incorporates plugins and/or buttons for social media networks, in order to allow easy sharing of content on your preferred social media networks. These plugins are programmed so as not to set any Cookies when users access the page in order to safeguard the privacy of Users. Cookies may be set, if so provided by the social networks, only when the user makes effective and voluntary use of the plugin. Please note that if the User browses the Website whilst logged in the social network, then he/she has already given consent to the utilisation of Cookies conveyed through this Website at the time of registration to the social media network.

The collection and utilisation of the data obtained by means of the plugins are regulated by the respective Privacy Policies of the social media networks, to which reference should be made:

Facebook: <https://www.facebook.com/help/cookies>

Twitter: <https://support.twitter.com/articles/20170519-uso-dei-cookie-e-di-altre-tecnologie-simili-da-parte-di-twitter>

Google+: <http://www.google.com/policies/technologies/cookies>

Pinterest: <https://about.pinterest.com/it/privacy-policy>

AddThis: <http://www.addthis.com/privacy/privacy-policy>

Linkedin: <https://www.linkedin.com/legal/cookie-policy>

e. Usage data

Data relating to the use of the Website by the User may also be collected, such as the pages visited, the actions performed, the functions and services used.

3. Cookies

a. Types of Cookies

The superglamours.it website uses cookies to make the user's browsing experience easier and more intuitive: cookies are small text strings used to store some information that may concern the user, their preferences or the Internet access device (computer, tablet or mobile) and are mainly used to adapt the operation of the website to the user's expectations, offering a more personalised browsing experience and memorising the choices previously made.

A cookie consists of a reduced set of data transferred to the browser from a server and can be read only by the server which has effectuated the transfer. This is not executable code and does not transmit viruses.

Cookies do not record any personal information, and any identifiable data will not be memorised. If you wish, you can prevent some or all of the cookies from being saved. However, in this case, the use of the website and the services it offers may be jeopardised. To proceed without modifying cookies options, simply continue browsing.

Below are the types of cookies that the site uses:

B. Technical cookies

There are numerous technologies used to store information on the user's computer, which are then collected from the websites. Among them, the most known and used are HTML cookies. They are used for navigation and to facilitate access to and use of the site by the user. They are necessary for the transmission of communications on electronic network or the supplier to deliver the service required by the client.

The settings to manage or disable cookies may vary depending on the Internet browser you are using. However, the user can manage or disable storage or deletion of cookies by changing the settings on their Internet browser. This can slow or prevent access to certain website features.

These cookies are functional for navigation and ensure safe and efficient exploration of the website.

Cookies that are inserted in the browser and retransmitted by Google Analytics or the statistical service of bloggers or similar sites are technical only if used for the purpose of optimising the site directly by the owner of the website, which can collect information in aggregate form on the number of users and how they visit the site. Under these conditions the same rules apply to cookie analytics as regards disclosure and consent as for technical cookies.

You can distinguish on the one hand temporary session cookies that are automatically deleted at the end of the browsing session - they identify the user to avoid logging into each visited page. Permanent cookies, on the other hand, remain active in the PC until expiration or deletion by the user.

Session cookies can be installed in order to allow access and stay in the reserved area of the portal as an authenticated user.

They are not stored permanently but exclusively for the duration of the browsing. When the browser is closed they are deleted automatically. Their use is strictly limited to the transmission of session identifiers, which consist of random numbers generated by the server and allow for safe and efficient website browsing.

c. Third-party cookies

Depending on the source, cookies can be either sent to the browser directly from the site you are visiting or from third parties, sent to the computer from other websites and not from the one you are visiting.

Permanent cookies are often third party cookies.

Most third party cookies include tracking cookies used to locate the behaviour of the users, to understand their interests and then to customise advertising proposals.

Third-party analytical cookies may be installed. These cookies are sent from above-mentioned third-party domains external to the website.

The analytical cookies of third parties are used to detect information on user behaviour on superglamours.it. The data, which is collected anonymously, is used to track performance and improve the performance of the website. Third-party profiling cookies are used to create user profiles in order to send advertising messages in line with their choices.

The use of these cookies is governed by rules prepared by the third parties, therefore we encourage you to review the privacy policies and guidelines to manage or disable cookies published in their web pages.

d. List of Cookies present on the website

Necessary cookies

COOKIE NAME	SUPPLIER	TYPE	VALID TO
__cfduid	backinstock.org	HTTP	1 year

First URL found	https://www.superglamours.it/products/altha-cashmere-black
Purpose of cookie	Used by the content network, Cloudflare, to identify reliable web traffic
Initiated	Inline script

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Origin	https://app.backinstock.org/widget/3186_1533105318.js?v=5shop=superglamorous.myshopify.com
Data sent in	United States

COOKIE NAME	SUPPLIER	TYPE	VALID TO
cookietest	superglamorous.it	HTTP	Session

First URL found	https://www.superglamours.it/products/altha-cashmere-black
Purpose of cookie	This cookie is used to determine if the visitor has consented to the use of cookies
Initiator	Source line number page 220-345
Origin	Inline script
Data sent in	Canada

COOKIE NAME	SUPPLIER	TYPE	VALID TO
csrftoken	instagram.com	HTTP	1 year

First URL found	https://www.superglamorous.it/pages/brand
Purpose of cookie	Helps prevent CSRF (Cross-Site Request Forgery) attacks
Initiator	Script tags
Origin	https://api.instagram.com/v1/users/21828990/media/recent?access_token=21828990.c5ee794.8d9b2434fc5e49f584ab3b89ca752_c24count=4callback=instafeedCache27a752e725a5fa3a.parse
Data sent in	Germany

COOKIE NAME	SUPPLIER	TYPE	VALID TO
PHPSESSID	webyze.com	HTTP	Session

First URL found	https://www.superglamours.it/products/altha-cashmere-black
Purpose of cookie	Preserves the user's status on the various pages of the site.
Initiator	Script tag, source line number page 180-197
Origin	https://www.webyze.com/ProductColors/productcolors-ad5cd4ea08c9ea7f427a53a485065c77b54191e9.js?shop=superglamorous.myshopify.com
Data sent in	France

COOKIE NAME	SUPPLIER	TYPE	VALID TO
secure_customer_sig	superglamorous.it	HTTP	20 years

First URL found	https://www.superglamours.it/products/altha-
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	cashmere-black
Purpose of cookie	This cookie is used to save customer credentials securely during the processing of a purchase on the site; the cookie is essential for the execution of a secure online transaction
Initiator	Web server
Origin	superglamorous.it
Data sent in	Canada

Statistical cookies

COOKIE NAME	SUPPLIER	TYPE	VALID TO
_ga	Superglamours.it	HTTP	2 years

First URL found	https://www.superglamours.it/products/altha-cashmere-black
Purpose of cookie	Creates a unique ID used to generate statistical data on how the visitor uses the website
Initiator	Source line number page 220-345
Origin	Inline script
Data sent in	Canada

COOKIE NAME	SUPPLIER	TYPE	VALID TO
_gat	Superglamours.it	HTTP	Session

First URL found	https://www.superglamours.it/products/altha-cashmere-black
Purpose of cookie	Used by Google Analytics to limit the frequency of requests
Initiator	Source line number page 220-345
Origin	Inline script
Data sent in	Canada

COOKIE NAME	SUPPLIER	TYPE	VALID TO
_gid	Superglamours.it	HTTP	Session

First URL found	https://www.superglamours.it/products/altha-cashmere-black
Purpose of cookie	Creates a unique ID used to generate statistical data on how the visitor uses the website
Initiator	Source line number page 220-345
Origin	Inline script
Data sent in	Canada

COOKIE NAME	SUPPLIER	TYPE	VALID TO
collect	Google-analytics.com	Pixel	Session

First URL found	https://www.superglamours.it/products/alta-cashmere-black
Purpose of cookie	Statistics
Initiator	Script tags
Origin	https://www.google-analytics.com
Data sent in	United States

COOKIE NAME	SUPPLIER	TYPE	VALID TO
vuid	vimeo.com	HTTP	2 years

First URL found	https://www.superglamorous.it/pages/craftmanship
Purpose of cookie	Collects data on user visits to the site, such as which pages have been consulted.
Initiator	Iframe, page source line number 1098
Origin	https://player.vimeo.com/video/197375437
Data sent in	United States

Cookie Marketing

COOKIE NAME	SUPPLIER	TYPE	VALID TO
_orig_referrer	Superglamours.it	HTTP	13 days

First URL found	https://www.superglamours.it/products/alta-cashmere-black
Purpose of cookie	This cookie is used to collect information about the visitor. This information is transformed into an identifying string with information about the visitor in question; identifying strings with information can be used to target groups with similar preferences or can be used by third-party domains or ad exchanges
Initiator	Web server
Origin	superglamorous.it
Data sent in	Canada

COOKIE NAME	SUPPLIER	TYPE	VALID TO
ads/ga-audiences	google.com	Pixel	Session

First URL found	https://www.superglamours.it/products/alta-
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	cashmere-black
Purpose of cookie	Marketing
Initiator	Inline script
Origin	https://www.google.co.uk/ads/ga-audiences?v=1aip=1t=sr_r=4tid=UA-65992936-1cid=28884660.1536855878jid=1621420003_v=j68z=1058383042slf_rd=1random=2873562787
Data sent in	Netherlands

COOKIE NAME	SUPPLIER	TYPE	VALID TO
fr	facebook.com	HTTP	3 months

First URL found	https://www.superglamours.it/products/altha-cashmere-black
Purpose of cookie	Used by Facebook to provide a series of advertising products as real-time offers from third-party advertisers
Initiator	Source line number page 220-345
Origin	Inline script
Data sent in	Germany

COOKIE NAME	SUPPLIER	TYPE	VALID TO
mcd	instagram.com	Pixel	10 years

First URL found	https://www.superglamours.it/products/altha-cashmere-black
Purpose of cookie	Marketing
Initiator	Script tags
Origin	https://api.instagram.com/v1/users/21828990/media/recent?access_token=21828990.c5ee794.8d9b2434fc5e49f584ab3b89ca752c24count=4callback=instafeedCache27a752e725a5fa3a.parse
Data sent in	United States

COOKIE NAME	SUPPLIER	TYPE	VALID TO
zur	instagram.com	HTTP	Session

First	https://www.superglamorous.it/pages/craftmanship
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URL found	
Purpose of cookie	Collects data on user visits to the site, such as which pages have been consulted.
Initiator	Script tag, source line number page 1136
Origin	https://api.instagram.com/v1/users/21828990/media/recent?access_token=21828990.c5ee794.8d9b2434fc5e49f584ab3b89ca752 c24count=4callback=instafeedCache27a752e725a5fa3a.parse
Data sent in	United States

COOKIE NAME	SUPPLIER	TYPE	VALID TO
tr	facebook.com	Pixel	Session

First URL found	https://www.superglamours.it/products/altha-cashmere-black
Purpose of cookie	Marketing
Initiator	Source line number page 220-345
Origin	https://www.facebook.com/tr/?id=721793724528376ev=PageViewdl=https%3A%2F%2Fwww.superglamorous.it%2Fproducts%2Faltha-cashmere-blackrl=https%3A%2F%2Fwww.superglamorous.it%2Fif=falsets=1536855877995sw=1024sh=768v=2.8.27r=stable a=plshopify1.2ec=0o=28it=1536855877958
Data sent in	Germany

COOKIE NAME	SUPPLIER	TYPE	VALID TO
urlgen	instagram.com	HTTP	Session

First URL found	https://www.superglamorous.it/pages/brand
Purpose of cookie	Marketing
Initiator	Script tag, source line number page 1136
Origin	https://api.instagram.com/v1/users/21828990/media/recent?access_token=21828990.c5ee794.8

	d9b2434fc5e49f584ab3b89ca752 c24count=4callback=instafeedCache27a752e725a5fa3a.parse
Data sent in	United States

4. Purpose of data processing

The **Data Controller** informs the Users of the Website that the data collected will be processed lawfully pursuant to art. 6 of the Regulations, and with your specific consent where necessary, exclusively for the following purposes:

- a) Allow the provision of the requested Services and the subsequent and autonomous management of the control panel, which will be accessed through the registration and creation of your user profile, including the collection, storage and processing of data for the purpose of establishing and subsequent operational, technical and administrative management of the relationship connected to the provision of the Services and the execution of communications relating to the development of the relationship established
- b) Requirements relating to the stipulation of contracts and appointments, to their execution and to subsequent modifications or variations and for any obligation envisaged for the fulfillment of the same
- c) Allow browsing and consultation of the Website
- d) Respond to requests for assistance or information, which we will receive via e-mail, telephone or through the "Contact Us" page of our Website
- e) Operational, organisational, managerial, fiscal, financial, insurance and accounting requirements related to the contractual and/or pre-contractual relationship established
- f) Monitoring requirements for the provision of services, the performance of relations with suppliers and the analysis and management of risks connected to the contractual relationship
- g) Conduct studies, research, market statistics
- h) For exclusive security purposes and to ensure prevention of fraudulent conduct, the Data Controller establishes an automatic control system that involves the detection and analysis of user behaviour on the website associated with the processing of Personal Data including the IP address
- i) Sending newsletters regarding the products and promotions of the website.

5. 4. Legal basis and mandatory or optional nature of the processing

The Data Controller shall process Personal Data relating to the User in the event that one of the following conditions is met:

- The User has given consent for one or more specific purposes:
- 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 fulfil a legal obligation to which the Data Controller is subject
- The processing is necessary for the performance of a task carried out in the public interest or for the exercise of official authority vested in the Data Controller
- The processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties.

It is however always possible to request the Data Controller to clarify the concrete legal basis of each processing.

The provision of personal data by the User is always optional, but is essential, with respect to the data indicated as mandatory and marked with an asterisk (*) via request forms. A possible refusal, even if legitimate, to provide all or part of the requested data, could compromise the regular progress of the relationship and in particular, for personal data defined as essential, could make it impossible for us to carry out the regular provision of the requested services.

6. Recipients of personal data

The Personal Data that will be provided may be known and used by the employees and/or associates of the Data Controller, responsible for managing the Website and the Users' requests, for the sole purpose of carrying out the activities strictly functional to achieve the purposes stated in the previous art. 3.

The Personal Data of Users may also be disclosed to third parties, appointed to the lawful processing on behalf of the Data Controller, in the capacity of **External Processing Managers** or **Independent Data Controllers**.

More specifically, the Personal Data of Users may be disclosed to third parties for the following purposes, strictly necessary for the provision of the requested services:

- External management of payments by credit card, bank transfer or other instruments. The Data used for the payment are acquired directly by the provider of the payment service requested without being in any way processed by this application. Payments are provided by communicating the Data to PayPal (Europe) Sarl et Cie <https://www.braintreepayments.com/en-it/legal/payment-services-agreement-eu> or to another manager of the selected payment service
- Archiving, hosting and back-end infrastructure management by communicating the Data to Shopify Inc.;
- Statistics only with anonymous data communicating the Data to Google LLC <https://policies.google.com/privacy>
- Shipping of products purchased by communicating the data entered during the order to the shipping company chosen by the Data Controller (DHL and FEDEX).

Users, by simple request addressed to the Data Controller, will be able to obtain the list of any External Processing Managers.

7. Existence of an automated decision-making process

There is no automated decision-making process. The data will not be subject to profiling.

8. Place of data retention

Personal Data is processed at the Data Controller's operational headquarters and in any other location where those involved in the processing are to be found. For more information, contact the Data Controller at the following email address info@superglamours.it.

Personal Data may be transferred to countries outside the EU: USA.

The Data Controller ensures that the processing of Your Personal Data by these recipients takes place in compliance with the Regulation. Indeed, data transfers can be based on a decision over their suitability or on the Standard Contractual Clauses approved by the European Commission Further information is available from the Data Controller.

9. Processing means and security measures

Personal Data processing is carried out by way of computer and/or telematic tools, with organisational methods and with software strictly related to the purposes indicated.

The Processing is carried out according to methods and with suitable tools to ensure the security and confidentiality of the data in accordance with the provisions of art. 32 of the 2016/679 European Regulation and by the art. 31 of Legislative Decree. 196/2003 concerning "suitable security measures" and art. 33 of Legislative Decree. 196/2003 concerning "minimum security measures".

In carrying out the processing operations, however, all technical, IT, organisational, logistical and procedural security measures will be adopted, as provided for in Annex B of Legislative Decree 196/2003, in order to guarantee the minimum level of data protection required by law.

10. Retention period

The Data Controller will process the Personal Data for the time necessary to fulfil the purposes connected with the execution of a contract between the Data Controller and the User and, in any case, not beyond the duration of 10 years from the termination of the relationship with the User.

When the processing of Personal Data is necessary for the pursuit of a legitimate interest of the Data Controller, Personal Data will be retained until the satisfaction of this interest.

If the processing of Personal Data is based on the User's consent, the Data Controller may retain Personal Data until revoked.

Personal Data may be stored for a longer period if necessary to fulfil a legal obligation or by order of an authority.

All Personal Data will be deleted at the end of the retention period. Upon expiry of this term, the right of access, cancellation, rectification and the right to portability of the Data may no longer be exercised.

11. Data subjects' rights

Users may exercise certain rights with regard to the Data processed by the Data Controller. In particular, the User has the right to:

- Withdraw consent at any time
- Object to the processing of personal data
- Access their data (Article 15 GDPR)
- Verify and request rectification (Article 16 GDPR)
- Obtain restriction of processing (Article 18 GDPR)
- Obtain the cancellation or removal of their Personal Data (Article 17 GDPR)
- Receive your Data or have it transferred to another data controller (Art. 20 GDPR)
- Propose a complaint to the supervisory authority for the protection of personal data and/or take legal action.

To exercise their rights, Users can send a request to the following email address info@superglamours.it. Requests are made free of charge and processed by the Data Controller as soon as possible, in any case within 30 days.

Last updated: **1 October 2018**