

## PRIVACY POLICY

### GENERAL INFORMATION

With this information Once Milano with registered office in Piazza citta di Boves n.5, Castello di Godego (TV), telephone 0423-468941 mail [info@oncemilano.com](mailto:info@oncemilano.com) as the Data Controller (hereinafter simply "Data Controller") - wishes to inform you about the processing of personal data that you provide through browsing this Web Site <https://oncemilano.com/> (hereinafter simply "**Web Site**").

For any clarification, information, exercise of the rights listed in this policy, please contact:

**email:** [info@oncemilano.com](mailto:info@oncemilano.com)

**address for sending racc. a/r:** Piazza Città di Boves, 5 Castello di Godego 31030 (TV).

Legislative Decree 196/2003 as amended by Legislative Decree 101/2018 and EU REG. 2016/679 ("GDPR") establish the rules to protect and safeguard individuals with regard to the processing of their personal data, and this notice is prepared in accordance with the new legislative decree.

This policy may change as new regulations are introduced, so please visit this section periodically for updates.

The Privacy Policy you are reading is only referable to the Website and the Owner is not liable for the way personal data processing is handled by third-party websites that can be linked through the Cookie section, or through any window-links on the Homepage.

According to the law, the processing of personal data is based on the principles of fairness, lawfulness, transparency, accuracy, limitation of purpose and storage, minimization, integrity of data, protection of user's privacy as well as protection of user's rights.

The Data Controller undertakes to comply with the aforementioned principles and, also for this purpose, hereby informs you that - except for those processing operations to which the law provides for your explicit consent - by browsing this Web Site, uploading or providing personal data, you accept and agree to be bound by the conditions and terms set out in this notice. Your consent to data processing may be revoked by you at any time by contacting the above addresses.

If you are under the age of 16, your consent is legitimate only if given or authorized by the person who holds parental or tutorial responsibility for you, in accordance with the provisions of Art. 8 EU Reg. 2016/679. For data subjects on the territory of Italy, consent is also legitimate, under the same conditions as above, if the person is 14 years of age or older.

Below is some information about the concept of processing personal data and the people who handle them.

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#### 1. PERSONAL DATA PROCESSED

"*Personal data*" means any information that could directly or indirectly allow users to be identified. Such information, for example, may be: name, address, user name, e-mail address, and phone number, or even the IP address of the device being used, browsing preferences or information related to the user's lifestyle or hobbies and interests in addition to the user's online shopping preferences.

The personal data processed are those voluntarily provided by the user (e.g., common data such as identification data, your phone, physical address to which to send the goods, data to perform the payment, email address) and those collected by tracking technologies (the cookies). The Data Controller processes these data in compliance with applicable regulations, assuming that they refer to you, or to third parties who have given you express authorization to process them. With respect to the data of third parties entered in the fillable fields on the Web site, you place yourself as an autonomous data controller, assuming on this point all legal obligations and related responsibilities. In this sense, you confer in favor of the Data Controller a full indemnity for any disputes that may arise from the third parties concerned and relating to the processing of their data entered on this Web site.

#### 2. DATA CONTROLLER

The "*data controller*" is the natural or legal person, public authority, service or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data. It also deals with security profiles.

With regard to this Website the Data Controller is the company as specified and identified above; for any request for clarification or exercise of your rights you may send an email at the following email address: [info@oncemilano.com](mailto:info@oncemilano.com)

#### 3. DATA CONTROLLER

The "*controller*" is the natural or legal person, public authority, service or other body that processes personal data on behalf of the controller.

Regarding Your personal data provided while browsing this Website, the Data Controller has appointed the various providers as data controllers, pursuant to and in accordance with Art. 28 EU Reg. 2016/679 where they act in that role.

More information is available at the following email address: [info@oncemilano.com](mailto:info@oncemilano.com)

#### 4. MODE OF PROCESSING.

On this Website, data are collected electronically and processed by means of operations carried out mainly with the aid of electronic tools, ensuring the use of appropriate measures for the security of the processed data and guaranteeing their confidentiality. In particular, data processing is carried out by minimizing the use of sensitive personal data.

Your personal data will be processed by collaborators and/or employees of the Data Controller as data processors, within the scope of their respective functions and in accordance with the instructions given by the Data Controller.

#### 5. PLACE OF PROCESSING AND SCOPE OF DATA CIRCULATION

The processing of personal data related to the services of the Web Site takes place at the above-mentioned Data Controller and is handled only by personnel authorized to do so.

Your personal data may be disclosed to Judicial Authorities and Police Forces only in cases where this is required by law and used by the Owner for the purpose of possible defense of its rights in court..

The collected data will not be disseminated. However, for the effective execution of the requested service, some data will be shared with external parties, appointed as data processors ex art. 28 Reg. UE 2016/679, called to carry out specific tasks on behalf of the company (ex: Web agency, professionals, etc.). The Data Controller is committed to protecting the security of personal data by taking all necessary IT and physical measures to protect the personal data provided. No security system guarantees such protection with absolute certainty, therefore, except in cases of liability for negligence, the Owner is not liable for the act performed by third parties who abusively access the systems without due authorization.

#### 6. PURPOSE OF THE PROCESSING and TYPE OF DATA PROCESSED.

To provide the Services through the Website, to allow you to contact the Controller to obtain information related to the Controller's business, to request information regarding the products displayed online on the Website, to allow you to purchase and send you the products purchased and to manage the organizational and administrative aspects related to the sale, to send you the newsletter if you have requested it as a Service by subscribing to it, and which contains only informational and non-commercial material, and to provide you with any other Service or information you request and is available to the Controller. The completion of the various information request forms does not constitute for the Owner any assumption of legal obligations, nor any formal initiation of negotiations. For the processing of common data of third parties released through the completion of the form, the Owner will process these data in compliance with applicable regulations, assuming that they refer to you or to third parties who have expressly authorized you to confer them on the basis of a suitable legal basis that legitimizes the processing of the data in question. With respect to such hypotheses, you stand as an autonomous Data Controller, assuming all the legal obligations and responsibilities. In this sense, it confers on the point full indemnity with respect to any dispute, claim, request for compensation for damages from processing, etc. that may be received by the Controller from third parties whose personal data have been processed through the completion of the form (Purposes of **"Provision of the Service"**). The data processed are common data. The Data Controller invites the user not to enter sensitive data (regarding one's health condition whether physical or psychological, political or religious orientation, etc.) unless strictly necessary for the purpose of requesting information or purchasing products;

- To send you marketing communications, promotions and advertising, including through the email address entered in the newsletter and/or fill-in fields (Purposes of "**Marketing**"). The data processed are common data;
- Send you marketing communications via email regarding products and services similar to those you have purchased through the Site ("**Soft Spam**"). The data processed are common data;
- Sending you commercial communications in line with your preferences ("**Profiling**")
- Statistically monitor site attendance in aggregate format ("**Analysis**");
- To fulfill legal obligations that require the Controller to collect and/or further process certain types of personal data (Purposes of "**Compliance**"). The data processed are common personal data;
- To prevent or detect any abuse in the use of the Web Site, or any fraudulent activity and thus enable the Holders to protect themselves in court (Purposes of "**Abuse and Fraud Prevention**"). The data processed are common personal data.

## 7. LEGAL BASIS FOR DATA PROCESSING

The legal basis for processing the personal data you provide through browsing is:

- **Provision of the Service:** the fulfillment of obligations of a contractual or pre-contractual nature ex art. 6 co 1 lett. b) GDPR. The processing for this purpose is necessary to be able to provide you with the requested service (e.g., request information regarding the Owner's products, or purchase products online), answer your questions. It is not mandatory to provide the requested personal data, however, failure to do so will not allow us to provide the requested service. With regard to the email address entered in the contact form (with non-commercial content), it is not mandatory to provide your data (email address), however, failure to provide the email address does not allow subscription to the newsletter. You can always - and at any time - revoke your subscription by unsubscribing from the newsletter using the appropriate link at the bottom of the newsletter or by writing to [info@oncemilano.com](mailto:info@oncemilano.com)
- **Marketing:** consent ex art. 6 co 1 lett. a) GDPR. The activity is also carried out through the newsletter (if the service is active) with promotional content. It is not mandatory to give your consent for the purpose of Marketing, and you can always revoke it at any time without any consequence (other than not to receive any more marketing communication) by writing to [info@oncemilano.com](mailto:info@oncemilano.com) [or](#) clicking on the unsubscribe link at the bottom of each marketing email.
- **Soft Spam:** the legitimate interest ex art. 6 co 1 lett. f) GDPR of the Data Controller in sending you products similar to those already purchased and therefore in line with your interests. You can object to such processing at any time by writing to [info@oncemilano.com](mailto:info@oncemilano.com) without any consequence (other than not receiving any more promotional communication);
- **Profiling:** consent ex art. 6 co 1 lett. a) GDPR. The activity is carried out through the installation of profiling cookies. The data processed are common data. You can object to such processing at any time by writing to [info@oncemilano.com](mailto:info@oncemilano.com) without any consequences.
- **Analysis:** the legitimate interest under Art. 6 co. 1(f) GDPR of the Owner;
- **Compliance:** the fulfillment of a legal obligation ex art. 6 co 1 lett. c) GDPR. Processing for this purpose is necessary for the Controller in order to comply with legal obligations under legislation, including industry regulations, including tax, fiscal or other obligations.

- **Abuse and Fraud Prevention:** the legitimate interest under Art. 6 co 1(f) GDPR. Processing for this purpose is aimed solely at enabling the Data Controller to prevent and/or detect any fraudulent activities committed through the Website and thus protect itself in court.

#### 8. DATA RETENTION PERIOD

The data processed to fulfill legal obligations will be kept until the fulfillment itself, and in any case for the period of time necessary to demonstrate the fulfillment; the data processed to fulfill contractual purposes until the fulfillment of the same and, if a contract is concluded or there have been pre-contractual negotiations, for ten years from the conclusion of the same in order to allow any judicial or extrajudicial protection as well as the demonstration of the correct fulfillment of the obligations contractually assumed. Data processed for marketing and profiling purposes until the data subject withdraws consent.

With regard to the activity of soft spam commercial communications via email and for the management of analytical cookies, the data will be retained until the data subject objects, to be exercised in the manner indicated below, or for processing based on consent, until the consent is revoked. The data processed for Compliance purposes, the data will be retained for the period of time indicated by the specific legislation.

Data processed for the purposes of Abuse and Fraud Prevention, the data will be retained for as long as is strictly necessary to enable the Holder to defend itself in court.

#### 9. RECIPIENTS OF PERSONAL DATA

The personal data you provide may come to the attention of the Data Controller and/or any appointed data processors.

Any additional categories of recipients who may become aware of your personal data during or after the execution of the contract are:

1. Individuals who process data in fulfillment of specific legal obligations;
2. external consultants and professionals who provide functional services, arising from or related to the above purposes (e.g. marketing activities), identified in writing and to whom specific written instructions have been given with reference to the processing of personal data;
3. Subjects with whom it is necessary to interact in order to execute the requested services (e.g. hosting providers, credit institutions);
4. persons authorized by the Data Controller to process personal data necessary to carry out activities closely related to the provision of the Services, who have committed to confidentiality or have an appropriate legal obligation of confidentiality (e.g., employees of the Data Controller);
5. in general, to all those public and private entities for which communication is necessary for the proper and complete fulfillment of the stated purposes;
6. Persons or entities to whom it is mandatory to disclose data for the purposes of Compliance, abuse and fraud prevention, or by order of the authority.

#### 10. DISSEMINATION OF DATA

Unless specifically requested by you in writing, or specifically ordered by the A.G./regulatory obligation, the personal data you provide is not subject to dissemination.

## 11. TRANSFER OF DATA

To provide some services, personal data may be transferred to third-party organizations or countries, where hosting or vendor servers are located.

Where this is the case, the Data Controller ensures that your Personal Data is processed by these recipients in accordance with applicable data protection legislation, including European and Italian legislation to which we are subject. Where required by European data protection legislation, the transfer of your Data outside the European Union will take place on the basis of appropriate safeguards (such as EU standard contractual clauses for the transfer of data between countries within the EU and countries outside the EU) and/or other legal bases in accordance with EU legislation.

More information is available from [info@oncemilano.com](mailto:info@oncemilano.com).

The Web Site also processes YOUR personal information through cookies. For more information on this topic, please read our [Cookie Policy](#) which is an integral part of this Privacy Policy.

## **USER'S RIGHTS UNDER EU REG. 2016/679**

Chapter III of EU REG.2016/679 lists the user's rights.

The Data Controller hereby informs you of the existence of specific rights, including the right to obtain from the Data Controller confirmation, or not, of the existence of your personal data (i.e. access), their provision in an intelligible form, as well as their rectification, or erasure or to restrict its processing in whole or in part or to object for legitimate reasons to it and/or to withdraw consent to its processing at any time (without prejudice to the consequences referred to in point 5 above), or to request the portability of your data with regard to the data subject to specific consent, or even to update it. As a "data subject", you also have the right to request the transformation into anonymous form, the limitation or blocking of data processed in violation of the law; you can also lodge a complaint regarding the unauthorized processing of your data with the Guarantor for the Protection of Personal Data in the manner published on the site of that authority (see <http://www.garanteprivacy.it/>). You have the right to know the origin of the data, the purposes and methods of processing, the logic applied to the processing, the identification details of the Data Controller and the persons to whom the data may be communicated.

Requests relating to the exercise of the aforementioned rights may be addressed to the Data Controller, at the contact details indicated above, without formalities or, alternatively, using the form provided by the Garante per la Protezione dei Dati Personali (Data Protection Authority) that can be found at the Site: <http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>.

Likewise, in the event of a violation of the regulations, you have the right to file a complaint with the Garante per la Protezione dei Dati Personali, as the authority in charge of controlling the processing in the Italian state. The template for filing a complaint with the Privacy Guarantor can be found at: <http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>.

To exercise one or more of the above rights, you may contact us at the following email address: [info@oncemilano.com](mailto:info@oncemilano.com).

For any information on cookies you can directly access the following link, i.e. to the consent management platform/banner cookies, where you can find all the necessary information.