

# Sicily By Car S.p.A. Privacy Policy

This Website collects some Personal Data of its Users.

Users may be subject to different protection levels. Therefore, some Users may benefit of a higher protection level. Further information in regard to protection standards may be found in the applicability section.

## Data Controller

Sicily by Car S.p.A. established in Via Galileo Galilei n.10/h - 39100 Bolzano (BZ) in the person of its Legal Representative Dr Cav Tommaso Dragotto.

**Data Controller e-mail address:** [privacy@sbc.it](mailto:privacy@sbc.it)

## Data Protection Officer

Dr Davide Candia

[dpo@sbc.it](mailto:dpo@sbc.it)

## Typology of Collected Data

Among the Personal Data collected autonomously or through third parties by this Website are: Cookies; Usage Data; name; surname; gender; date of birth; telephone number; VAT Number; company name; occupation; address; fax number; country; state; province; email; postal code; different typologies of Data; city; Fiscal Code; business sector; User ID; Website.

Full details of each typology of collected data are provided in the dedicated section of this privacy policy or through specific informational texts displayed before data collection. Personal Data may be freely supplied by the User or, in case of Usage Data, automatically collected while using this Website.

Unless otherwise specified, all Data requested by this Website are mandatory. If the User refuses to provide the information, it may be impossible for this Website to supply the Service.

In the cases in which this Website indicates that some Data is non-mandatory, Users are free to refrain from disclosing such Data, without this having any consequences on the Service availability or its functionality.

Should Users have any question about which Data is mandatory, they are invited to contact the Data Controller.

The eventual usage of Cookies – or other tracking tools – by this Website or by holders of third party services used by this Website, unless otherwise specified, besides further purposes described in this document and in the Cookie Policy, if available, is aimed at supplying the Service required by the User.

The User take responsibility for third parties' Personal Data obtained, published or shared through this Website and guarantees to have the right to communicate or release those Data; as a consequence, the Controller shall have no liability towards third parties.

# **Modalities and place of collected Data processing**

## **Modalities of the processing**

The Controller takes appropriate security measures aimed at preventing the unauthorized access, disclosure, editing or deletion of Personal Data.

The processing is undertaken by means of electronic tools, with organizational arrangements and methods closely connected to the specified purposes. Besides the Controller, in some cases, other actors may access to Data, for instance the persons participating in the organization of this Website (administrative, commercial, marketing, legal, system managing personnel) or external actors (as suppliers of other technical services, express couriers, hosting providers, computer companies, communication agencies) also designated, where necessary, by the Controller as Responsible Officers for Data Processing.

The updated list of Responsible Officers may be always requested to the Controller.

## **Legal basis for the processing**

The Controller processes Personal Data related to the User in case one of the following conditions is present:

- the User agreed for one or more specified purposes; Please note: in some jurisdictions the Controller may be authorized to process Personal Data without the consent of the User or another of the legal basis specified below, until the User objects to the processing ('opt-out'). However, this is not applicable in case the Personal Data processing is regulated by the European jurisdiction in regard to Personal Data protection;
- the processing is necessary for the performance of a contract with the User and/or the performance of pre-contractual measures;
- the processing is necessary to fulfill a legal obligation the Controller is subject to;
- the processing is necessary for the performance of a public interest or the Controller's exercise of public powers;
- the processing is necessary for the legitimate interests pursued by the Controller or by third parties.

However, it is always possible to request the Controller to clarify the specific legal basis of each processing and, more particularly, to specify if the processing is based on the Law, foreseen by a contract or necessary to sign an agreement.

## **Place**

Data are processed at the Controller's operational offices and in any other place in which the parties involved in the processing are located. For further information, please contact the Controller.

The Personal data of the User may be transferred to a country different by that in which the User is. For further information on the place of processing, the User may refer to the section related to the details of Personal data processing.

In case of higher protection, the User has the right to obtain information in regard to the legal basis of the Data transfer outside the European Union or to an international organization of public international law or built up by two or more countries, as for instance the UN, as well as in regard to security measures taken by the Controller to protect the Data.

If one of the above mentioned Data transfer takes place, the User may refer to this document relevant sections or ask the Controller for information by contacting him by means of contact details mentioned at the beginning of this document.

## **Data retention period**

Data shall be processed and retained for the time necessary to fulfill the purposes Data have been collected.

Therefore:

- Personal Data collected for purposes connected to the performance of a contract between the Controller and the User will be held until the contract has been completely performed.
- Personal Data collected for purposes related to the legitimate interest of the Controller, may be held until the fulfillment of this interest. The User may obtain further information in regard to the legitimate interest of the Controller in the relevant sections of this document or by contacting the Controller.

When the processing is based on the User's consent, the Controller may hold the Personal Data for a longer period, until such consent is revoked by the User. Furthermore, the Controller may be obliged to retain the Personal Data for a longer period whenever required to perform a legal obligation or upon order of an authority.

At the end of the retention period, the Personal data will be deleted. Therefore, after this deadline, the right to access, deletion, editing and the right to Data portability may no longer be exercised.

## **Purposes of the collected Data processing**

User's Data are collected in order to allow the Controller to supply its Services, as well as for the following purposes: Statistics, Contacting the User, Interaction with social networks and external platforms and Management of contact details and message sending.

In order to receive further detailed information on the purposes of the processing and Personal Data specifically related to each purpose, the User may refer to the relevant sections of this document.

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

Personal data are collected for the following purposes and by means of the following services:

### **Contacting the User**

#### **Contact form (this Website)**

The User, by filling out the contact form with its Data, consents to their usage for answering requests for information, quotation, or any other nature specified in the form headline.

Personal Data collected: postal code; Fiscal Code; surname; date of birth; email; User ID; address; country; name; fax number; telephone number; VAT Number; occupation; province; company name; gender; business sector; website; civil status; different typologies of Data.

#### **Mailing list or newsletter (this Website)**

By registering for the mailing list or newsletter, the User's email address will be automatically entered in the contact list used to send emails containing information, including information of commercial and promotional nature, related to this Website. The User's email address may also be added to this list as a result of the User's registration to this Website or after having proceeded with a purchase.

Personal Data collected: city; surname; date of birth; email; name; telephone number.

### **Contact detail management and message sending**

This type of services shall allow to manage a database of email contact details, telephone numbers, or contact details of any other type, used for communicating with the User.

These services may also allow to collect data related to date and time of message viewing by the User, as well as the User's interaction with those, for instance information on clicks on links displayed in messages.

### **MailUp (MailUp)**

MailUp is a service of address management and email message sending supplied by MailUp S.p.A.

Personal Data collected: email.

Place of processing: Italy – [Privacy Policy](#).

### **Interaction with social networks and external platforms**

This type of services allows to perform interactions with social networks, or other external platforms, directly on the pages of this Website.

Interactions and information acquired by this Website are anyway subject to the User's privacy settings related to each social network.

This type of service may however collect data on the traffic for those pages on which the service is installed, even when the Users do not use it.

We recommend to disconnect from the relevant services in order to ensure that the data processed on this Website shall not be reconnected to the User's profile.

### **Facebook Like button and social widgets (Facebook, Inc.)**

Facebook 'I Like' button and social widgets are services of interaction with the social network Facebook, and supplied by Facebook, Inc.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#). This subject is member of the Privacy Shield.

### **Statistics**

Services contained in the present section shall allow the Controller to monitor and analyze the traffic data, and are used to track the User's behavior.

### **Google Analytics (Google Inc.)**

Google Analytics is a Web analysis service supplied by Google Inc. ('Google'). Google uses the collected Personal Data in order to track and analyze this Website usage, compile reports and share them with other services developed by Google.

Google may use Personal Data to contextualize and personalize its advertising network ads.

Personal Data collected: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). This subject is member of the Privacy Shield.

## **Further information on the Personal Data**

### **Nexi – Virtual POS**

Online payment system, it may be accessed through redirect, we do not directly send any sensitive data.

The collected Personal Data are used to provide the User with services or to sell products, which are included in the payment. The Personal Data collected to improve the payment experience may be those related to credit card, bank account used for money transfers or other types of provided payment tools.

## Manet Mobile Solutions

Partner with headquarters in Rome, Via Nimorense 91 - 00199 VAT no.: 13464271009, the data usage has commercial purposes (newsletter) and purposes of service and optional device supply.

### Sale of goods and online services

The collected Personal Data are used to provide the User with services or for selling products, which are included in the payment, and the eventual delivery. The Personal Data collected to improve the payment experience may be those related to credit card, bank account used for money transfers or other types of provided payment tools. Payment Data collected by this Website depend on the used payment system.

## User rights

Users may exercise certain rights with reference to Data processed by the Controller.

In the case of higher protection, the User may exercise all of the following rights. In any other case, the User may contact the Controller in order to find out which right is applicable in his specific case and how to exercise it.

More particularly, the User has the right to:

- **revoke his consent at any time.** The User may revoke the previously given consent to the processing of his own Personal Data.
- **object to the processing of his own Data.** The User may object to the processing of his own Data in case the processing occurs on a legal basis different from the one the consent was given. Further details on the right to object are specified in the following section.
- **access to his own Data.** The User has the right to obtain information on the Data processed by the Controller, on specific aspects of the processing, the User has also the right to request a copy of the processed Data.
- **verify and ask for correction.** The user may verify the correctness of his own Data and ask for updates or correction.
- **obtain limitation to the processing.** In case specific conditions occur, the User may ask for limitation of processing of his own Data. In such case, the Controller will not process the Data for any other purpose apart from Data storage.
- **obtain deletion or clearance of his own Personal Data.** In case specific conditions occur, the User may ask the Controller for deletion of the User's Data.
- **receive his own Data or have them transferred to another controller.** The User has the right to receive his own Data in a structured, machine-readable format of common use and, if technically feasible, to obtain an unhindered transfer to another controller. Such a provision is applicable when the Data are processed as automated tools and their processing is based on the User's consent, on a contract the User is part of, or on contractual measures linked to it.
- **lodge a complaint.** The User may lodge a complaint before the competent authority in charge of personal data protection supervision or bring the matter before the judicial authorities.

### Details on the right to object

When the Personal Data is processed in the public interest, in the exercise of the Controller's public powers or in order to pursue the Controller's legitimate interest, the Users have the right to object to the processing for reasons connected to their specific situation.

Users must know that, if their Data are processed for direct marketing purposes, Users may object to the processing without providing any reason. In order to find out if the Controller is processing the Data for marketing purposes, Users may refer to the relevant sections of this document.

### **How to exercise the User's rights**

In order to exercise the User's rights, the User may send a request to the Controller's contact details specified in this document. Requests are free of charge and will be replied to as soon as possible by the Controller, in any case within one month upon receipt.

### **Applicability of the higher protection level**

While the majority of provisions included in this document is valid for all Users, some provisions are specifically made subject to a higher level of Personal Data protection.

Such a higher protection level is always guaranteed in case the processing:

- is undertaken by a Controller based in the EU; or
- is related to Personal Data of Users that are located in the EU and it is functional to the offering of goods or services, either free of charge or against payment, towards those Users; or
- is related to Personal Data of Users that are located in the EU and allows the Controller to monitor those Users' behavior to the extent that such a behavior occurs within the EU.

### **Cookie Policy**

This Website is using Cookies. In order to have more information about it and view the detailed information notice, the User may refer to our [Cookie Policy](#).

### **Further information about the processing**

#### **Legal defense**

The Personal Data of the User may be used by the Controller in court proceedings or in those phases in preparation for the eventual legal defense against illicit usage of this Website or relevant Services by the User.

The User declares to be aware that the Controller may be obliged to reveal the Data by order of the public authorities.

#### **Specific information notices**

Upon request of the User, in addition to the information included in this privacy policy, this Website may provide the User with additional and contextual information notices in regard to specific Services, or the collection and processing of Personal Data.

#### **System logs and maintenance**

For needs connected to functioning and maintenance, this Website and the eventual third party services may gather system logs, namely files that register interactions and may also contain Personal Data, such as the User IP address.

#### **Information not included in this policy**

Further information in regard to Personal Data processing may be requested to the Controller at any time by means of the aforementioned contact details.

## **Response to 'Do Not Track' requests**

This Website does not support 'Do Not Track' requests.

In order to find out if the eventual third party services do support such requests, the User may refer to the corresponding privacy policy.

## **Editing to this privacy policy**

The Controller reserves the right to make changes to this privacy policy at any time, by notifying the Users on this page and, if possible, on this Website, as well as, if technically and legally feasible, by sending a notification to the Users through one of their contact details the Controller holds. Users are therefore invited to regularly check this page, by looking at the date of last editing specified underneath.

If changes do not involve processing whose consent is legal basis of, the Controller will ask again for the User's consent, if necessary.

## **Definitions and legal references**

### **Personal Data (or Data)**

Any information that directly, or indirectly, or in connection with other information - including a personal identification number – allows for the identification or identifiability of a natural person.

### **Usage Data**

Information automatically processed through this Website (even by third party applications integrated in this Website), including: IP addresses or names with domains of computers used by the user logging onto this Website, URI (Uniform Resource Identifier) addresses, the time of the request, the method used to send the request to the server, the size of the file obtained as a response, the numeric code indicating the status of the response from the server (successful, error, etc.), the country of origin, the characteristics of the browser and the operating system used by the visitor, the various time details of the visit (for instance, time of permanence on each page) and details related to the itinerary followed within the Application, with particular reference to the sequence of viewed pages, the parameters connected to the operating system and the electronic environment of the User.

### **User**

The individual that uses this Website and that, unless otherwise specified, coincides with the Data Subjects.

### **Data Subject**

The natural person whom the Personal Data refer to.

### **Responsible Officer for Data processing (or Responsible Officer)**

The natural person, the legal person, the public administration and any other entity that processes personal data on behalf of the Controller, according to what stated in this privacy policy.

### **Data Controller (or Controller)**

The natural or legal person, the public authority, the service or the organization which, alone or jointly with others, determines purposes and means for the processing of personal data and the adopted instruments, including security measures related to the functioning and use of this Website. The Controller, unless otherwise specified, is the holder of this Website.

### **This Website (or this Application)**

The hardware or software tool through which Users' Personal Data are collected.

**Service**

The Service supplied by this Website as defined in the relative terms (if available) on this site/application.

**European Union (o EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

**Cookie**

Small portion of data stored inside the User's device.

**Legal references**

This privacy statement has been prepared based on provisions of multiple legislation, including Art. 13/14 of Regulation (EU) 2016/679.

Unless otherwise specified, this policy statement applies only to this Website.

Last editing: June 30<sup>th</sup>, 2019