

# GMSPAZIO Privacy Policy

Effective as of May 25, 2018

## 1. Introduction

At GMSPAZIO, we want to give you the best possible experience to deal with us.

That said, your privacy and the security of your personal data are important for us, so we want to transparently explain how and why we gather, store, share and use your personal data - as well as outline the controls and choices you have around when and how you choose to share your personal data with us.

That is our objective, and this Privacy Policy ("Policy") will explain exactly what we mean in further details below.

## 2. About this Policy

This Policy sets out the essential details relating to your personal data relationship with GMSPAZIO. The aim of this Policy is to:

- Ensure that you understand what personal data we collect about you, the reasons why we collect and use it, and who we share it with;
- Explain the way we use the personal data; and
- Explain your rights and choices in relation to the personal data we collect and process about you and how we will protect your privacy.

We hope this helps you to understand our privacy commitments to you. Alternatively, if you do not agree with the content of this Policy, then please remember, it is your choice whether you want to continue business relationships with GMSPAZIO.

## 3. Your rights and your preferences: Giving you choice and control

You may be aware that a new European Union law, called the General Data Protection Regulation or "GDPR" gives certain rights to individuals in relation to their personal data. As available and except as limited under applicable law, the rights afforded to individuals are:

- Right of Access - the right to be informed of and request access to the personal data we process about you;
- Right to Rectification - the right to request that we amend or update your personal data where it is inaccurate or incomplete;
- Right to Erasure - the right to request that we delete your personal data; and
- Right not to be subject to Automated Decision-making - the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

In order to enable you to exercise these rights with ease and to record your preferences in relation to how GMSPAZIO uses your personal data, we require you to send any related update to the POCs listed at the end of this document.

## 4. How do we collect your personal data?

We collect your personal data only and exclusively for the purposes related to our business relationships, thus all your personal data are only and exclusively used to that scope.

## 5. What personal data do we collect from you?

We collect and use personal data related to individuals appearing inside official business-related documents and message exchanges (i.e.: emails, etc.) flowing between our organizations.

## 6. What do we use your personal data for?

We use personal data related to individuals appearing inside official business-related documents and message exchanges (i.e.: emails, etc.) flowing between our organizations, only and exclusively for the aforementioned business purposes.

## 7. Sharing your personal data

We share individuals' personal data, not individuals' personal data acting on behalf of companies, only and exclusively for activities related to accounting, sales, purchasing and taxes subjects.

## 8. Data retention and deletion

We keep your personal data only as long as necessary as stated by the EU Laws. If you request, we will delete or anonymize your personal data so that it no longer identifies you, unless, we are legally allowed or required to maintain certain personal data, including situations such as the following:

- Where we are required to retain the personal data for our legal, tax, audit, and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users.

## 9. Transfer to other countries

We transfer personal data related to individuals appearing inside official business-related documents and message exchanges (i.e.: emails, etc.) flowing between our organizations, only and exclusively for the mentioned business purposes.

## 10. Keeping your personal data safe

We are committed to protecting individual personal data. We implement appropriate technical and organizational measures to help protect the security of your personal data; however, please note that no system is ever completely secure. We have implemented various policies including, encryption, access, and retention policies to guard against unauthorized access and unnecessary retention of personal data in our systems.

## 11. Changes to this Privacy Policy

We may occasionally make changes to this Policy.

When we make material changes to this Policy, we'll provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the GMSPAZIO site ([www.gmspazio.com/about\\_us/](http://www.gmspazio.com/about_us/))

Please, therefore, make sure you read any such notice carefully.

## 12. How to contact us

Thank you for reading our Privacy Policy. If you have any questions about this Policy, please contact us writing an email to [admin@gmspazio.com](mailto:admin@gmspazio.com) or by writing to us at the following address:

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(Italy)