

PRIVACY POLICY OF CARRIER ITALIA S.r.l.

Pursuant to art. 13 EU Regulation 2016/679 GDPR

EFFECTIVE DATE: 1.6.2022

The Privacy Policy explains how Carrier Italia S.r.L. collects, controls, processes and uses the personal data of users of its web services.

When we speak of "Site", we mean our platform, which includes our website, platform and the communications we send or the services we provide.

AMENDMENT

This policy is updated on 1.06.2022 Any future changes to this policy will be published on this page. Carrier Italia S.r.L. invites Users to regularly view this page, in order to be updated in relation to any changes.

Any changes to this policy will be notified to you by email (sent to the email address specified in your account), or by notice on the Site. You can check when this version of the Privacy Policy has been adopted, by referring to the "Effective Date" mentioned above.

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1. DATA CONTROLLER OF PERSONAL DATA

The data controller, is the subject that determines the purposes and means of the processing of personal data to whom you can address to exercise the rights recognized by the GDPR, is Carrier Italia S.r.L., Via Anagnina, 584 – 00118 Rome Italy VAT: IT10231271007

The Data Controller may be contacted by sending an e-mail to privacy@smooos.com or by sending a communication by traditional mail to the address of the Data Controller, taking care to specify the reason of the request.

The data controller may appoint one or more data processors pursuant to art. 28 of the GDPR.

2. PERSONAL DATA COLLECTED

The personal data subject to processing are collected mainly from the User, when the latter navigates the Site or makes use of the services made available by it. This policy analyzes the personal data processed in the different sections of the Site. The data collected by the Site are mainly processed electronically through software and computer procedures suitable for ensuring technical and IT security measures.

We will collect the following personal data when you interact with the Site: www.smooos.com

2.1 NAVIGATION DATA

The computer systems and software procedures responsible for the operation of the website acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified data subjects, but that by their very nature could, through processing and association with Data held by third parties, allow you to identify users. This category of Data includes the IP addresses or domain names of computers used by Users (connecting to the site etc.), of the requested resources, the time of the request, the method used to submit 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 (good end, error, etc.) and other parameters related to the User's operating system and IT environment.

This Data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and is deleted immediately after processing. The Data may be used to ascertain liability in case of hypothetical computer crimes against the site. In any case, the Data are kept for the period strictly necessary and in accordance with the current legal provisions on the subject.

2.2 DATA VOLUNTARILY PROVIDED BY USERS

Voluntary, optional and explicit sending of Data by the User (e.g. by registering in the Database or entering your Data by filling in appropriate forms, also in order to verify the possibility of accessing the Services provided by the same, and the sending of e-mail to the addresses indicated on the website), entails the subsequent acquisition of the sender's address and the Data provided by the same, for which the User issues express Consent to their Processing.

2.3 DATA PROVIDED THROUGH THE WEBSITE

The use of the Platform on the website for the transmission of SMS and e-mail communications allows you to detect the opening of a message, from which IP address or what type of browser the email is opened, and other technical details. The collection of such Data is functional to the use of the service offered and is an integral part of the functionality of the system of sending messages.

2.4 DATA VOLUNTARILY PROVIDED BY USERS FOR MARKETING PURPOSE

If the User has expressed Consent to the Processing of Personal Data also to receive advertising and promotional communications on the Data Controller's services, take advantage of discounts, freebies and exclusive offers.

2.5 OPTIONALITY ON PROVIDING PERSONAL DATA

Except as specified for navigation data, the user is free to provide the personal data reported in the appropriate electronic request forms. It should be noted, however, that failure to provide the above mentioned personal data may make it impossible to obtain the requested service.

3. METHODS OF PROCESSING. HOW WE USE INFORMATION

We control and process the personal data that you provide to us, that we collect from other sources, and that we generate:

- through automated electronic tools, computerised and telematic, or by manual processing with logics related to the purposes for which the Data were collected;
- treated lawfully, correctly and transparently to the data subject;
- collected for specific, explicit and legitimate purposes, and subsequently processed so that it is not incompatible with such purposes;
- appropriate, relevant and limited to what is necessary for the purposes for which they are processed;
- accurate and, if necessary, updated;
- stored so as to allow the identification of the Data Subject for a period of time not exceeding the achievement of the purposes for which they are processed;
- processed in such a way as to ensure adequate security of personal data, including protection, through appropriate technical and organisational measures, from unauthorised or unlawful processing and from loss, destruction or accidental damage.
- for marketing operations, through the sending of advertising material, or commercial communications concerning the offer of its products and/ or services, related to any promotional sales, including by SMS and/ or email or by sending newsletters.
- for marketing operations; through automated decision-making processes, including profiling, we analyze your interactions with the Site, and other personal data belonging to you, to identify your interests, What types of products and services also buy people with similar interests to you, which helps us understand which products and services you might be interested in viewing. This is to address our legitimate interests in understanding the types of

products and services our customers are interested in and to provide products that are more relevant to you and our other customers;

- for indirect marketing purposes by sending advertising material, or commercial communications concerning the offer of products and/or services of third parties, relating to any promotional sales, including via SMS and/or e-mail.

4. PURPOSES OF PROCESSING AND LEGAL BASIS OF PROCESSING

The General Data Protection Regulation (GDPR) of the European Union requires that our processing of personal data is based on a legal basis. The legal bases we use depend on the specific purpose for which we process your personal data.

We use the following legal bases for the processing of personal data:

- **PURPOSE: execution of a contract.**

To conclude, manage and execute requests for contact or the provision of services submitted by the interested party; organize, manage and execute requests for contact and provision of services also by communication to third parties in general, also suppliers and/or collaborators and/or subsidiaries and/or affiliated companies for the purpose of providing services and/or for the defence of rights and/or in compliance with the obligations provided by law or regulations and on request by the competent Authorities. This legal basis covers the case where we use your personal data to receive and manage orders and process payments.

Legal basis: Art. 6, comma 1 letter b GDPR the processing is necessary for the execution of a contract to which the data subject is a party or for the execution of pre-contractual measures taken at the request of the same.

- **PURPOSE: legitimate business interest and protection of the interests of our customers.**

To check the correct functioning of the services of Carrier Italia S.r.l., in order to improve the quality of the services offered and optimize the functionality of the Site. Such data shall be processed to an extent strictly necessary and proportionate to ensure the security of the networks and information passing through them, for example: security measures; fraud protection (for example, where it may be necessary to retain the data of persons who have engaged in unlawful conduct or in violation of the agreed Conditions); transfer of data between different parts of the same company; risk assessment; exercise of the right of opposition (for example, if it may be necessary to keep the email to prevent the sending of further commercial communications); personalization of the website to improve the user experience; web analysis, verification of the number of site visitors, comments, etc.; reporting of offences to the judicial authority; network and communications security measures.

Legal basis: Art. 6, comma 1 letter b GDPR – (cf. recital 47 of the GDPR).

- **PURPOSE: fulfilment of a legal obligation.**

When we use your personal data to comply with legal obligations. For example, we collect information from third party vendors about their location and bank account for identification purposes.

Legal basis: Art. 6, comma 1 letter b GDPR.

- **SPECIFIC PURPOSES FOR WHICH WE REQUEST YOUR CONSENT.**

When we ask for your consent to process your personal data for specific purposes that we communicate to you. When you consent to the processing of your personal data by us for a specific purpose, you may revoke your consent at any time and, in that case, we will cease to process your data for that purpose.

Legal basis: Art. 6, comma 1 letter a GDPR.

5. DATA COMMUNICATION

Your data may be communicated, for the purposes referred to in point 4), to other public or private subjects, internal and external to our Company.

For this purpose, we would like to inform you that your data will be transmitted to R&D Communication S.r.l. (VAT IT03269830232) based in Via dei Castagni 9, Verona, a company that owns and manages the platform you have access to for the management and sending of Messages, without such transmission it is not possible for us to offer you our services. Given that R&D Communication S.r.l. has been appointed by us

responsible for the processing of your data, you authorize us to appoint you as sub/processor with reference to the data of your users that you will enter on the platform managed by the same. In addition, we would like to inform you that your data will be transmitted to the individual company Di Stasio Pasquale (VAT IT01703900629) as owner of the trademark prenotime, transmission necessary in order to benefit from the trial period of the service offered by the same on the website www.prenotime.it. In view of the complexity of the Service offered, we also specify that as data processors and/or sub-processors, for the achievement of the purposes represented in this statement, may become aware of your Data, even external subjects of our trust (outsourcers) to whom we entrust certain technical or organizational tasks, such as, for example, third-party providers of IT, telematics or storage services, postal services, printing and mail-stuffing companies, studies to which we entrust the accounting of computer services, etc.; in all these cases, these subjects will process the data in accordance with the instructions received by us according to operational profiles assigned to them in relation to the functions performed, limited to what is necessary and instrumental for the execution of specific operations within the services requested and exclusively for the achievement of the purposes represented in this statement.

6. DATA RETENTION PERIOD

Personal Data will be stored for the period of time necessary to fulfil the purposes which they were collected for.

In particular, the Personal Data will be kept for the duration of the contractual relationship, for the execution of the related and consequential obligations, for compliance with the applicable legal and regulatory obligations, and for its own or third party defence purposes. Therefore, for the contractual purposes, the data will be kept for the duration of the existing relationships and, in accordance with current legislation for a period of 10 years from the date of termination of the contract or, in case of disputes, for the prescriptive period provided for by the law for the protection of related rights, except in any case longer retention periods provided for by specific industry regulations.

In case of data collected during registration, the procedure of which is not completed, the data will be deleted within 48 hours from the last operation completed by the User.

If the processing of your Personal Data is based on your consent, we may retain your Personal Data until you withdraw your consent.

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

7. RIGHTS OF THE INTERESTED PARTY

You can access, update, correct and delete your personal data that are part of your profile, by logging into your account or by contacting us at e-mail privacy@smooos.com

Keeping your personal data up to date allows us to ensure that we respect your preferences and offer you the goods and services that are most relevant to you.

In accordance with art. 7 of the Code and Chapter III of the GDPR, the Data Subject has the right to:

- 7.1 obtain confirmation of the existence or not of Personal Data concerning him, even if not yet registered, and their communication in intelligible form;
- 7.2 obtain the indication:
 - a. the origin of Personal Data;
 - b. the purposes and methods of processing;
 - c. the logic applied in the case of processing carried out with the help of electronic tools;
 - d. the identification details of the Data Controller, Managers, Sub-Managers and the designated representative;
 - e. the subjects or categories of subjects to whom Personal Data may be communicated or who may become aware of them as designated representative in the territory of the State, of Managers or Persons in charge;
 - f. the envisaged retention period for personal data or, if this is not possible, the criteria used to determine that period;
 - g. if the Data are not collected from the Data Subject, all available information on their origin;

- 7.3 obtain the rectification, integration or cancellation (RTBF – right to be forgotten) of Personal Data or the limitation of the Processing of Personal Data concerning them;
- 7.4 obtain data portability;
- 7.5 object, in whole or in part:
 - a. for legitimate reasons to the Processing of Personal Data concerning him, relevant to the purpose of collection;
 - b. to the Processing of Personal Data concerning him for the purpose of sending material advertising or direct sales or to carry out market research or commercial communication.
- 7.6 submit a complaint to a Supervisory Authority.

CONTACT INFORMATION

Information and requests regarding privacy, including in relation to the rights of the Data Subject, may be addressed to the Data Controller by e-mail at privacy@smooos.com

I HAVE READ THE INFORMATION AND I AUTHORIZE THE PROCESSING OF MY DATA FOR THE INDICATED PURPOSES