### Privacy Policy www.marsavia.com

#### WHY THIS NOTICE

This page describes how the site is managed with regard to the processing of the personal data of visitors who consult it. This information is provided pursuant to Article 13 of EU Regulation No. 679/2016 to those who interact with the web services of www.marsavia.com.

This information is provided only for the <u>www.marsavia.com</u> website and not for any other websites that may be consulted by the user via links.

## THE DATA CONTROLLER

Following consultation of this site, data relating to identified or identifiable persons may be processed.

The data controller is Marsavia, Gabriele Marsetic sp, tax code: 44269200 Breznikova ulica 15, 1230 Domzale (Slovenija), + 386 (0) 40 311006 office@marsavia.com

#### PLACE OF DATA PROCESSING

The processing operations connected with the web services of this website take place at the above-mentioned head office in **Domzale**, **Breznikova ulica 15**, 1230 **Domzale** (Slovenija) and are carried out only by technical personnel of **Marsavia**, **Gabriele Marsetic sp**, or by persons in charge of occasional maintenance operations appointed by **Marsavia**, **Gabriele Marsetic sp**.

## TYPES OF DATA PROCESSED

Navigation data

The computer systems and software procedures used to operate this website acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected in order to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to 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 site and to check its correct operation, and is deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes to the detriment of the site: apart from this eventuality, data on web contacts do not currently persist for more than seven days.

# Data provided voluntarily by the user

The optional, explicit and voluntary sending of e-mails to the addresses indicated, or by means of *forms*, on this site entails the subsequent acquisition of the sender's contact data, which is necessary in order to reply to requests and to carry out the requested activities.

Apart from what is specified for navigation data, the provision of data for further processing purposes is optional. Failure to provide such data may make it impossible to pursue these further purposes.

### PURPOSE OF PROCESSING AND LEGAL BASIS

Personal data are processed:

- pursuant to Art. 6 GDPR, for the performance of the contract or pre-contractual measures taken upon request, to fulfil a legal obligation to which the data controller is subject, to comply with obligations laid down by law, a regulation, EU legislation or an authority order;
- pursuant to Art. 7 GDPR, for marketing purposes (sending by mail, post and telephone, newsletters, commercial communications and advertising material on products and services offered by the owner and detecting the degree of satisfaction on the quality of services);
- for technical administration of the website, software development and maintenance, as well as for enquiries, recruitment, comments and interactions with the site, newsletter subscription, targeted marketing and collection of site navigation statistics.

#### METHODS OF TREATMENT

The processing of personal data is carried out, in accordance with Art. 4 para. 2 GDPR, through the collection, recording, organisation, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, restriction, deletion or destruction.

Personal data are subject to paper, electronic and automated processing.

They may be made accessible for the above-mentioned purposes to employees and collaborators, as well as to third-party companies and other entities (e.g. credit institutions, professional firms, consultants, insurance companies, etc.).

Specific security measures are observed to prevent loss of data, unlawful or incorrect use and unauthorised access.

#### Profiling

The processing involves automated decision-making within the meaning of Article 22 GDPR, including profiling.

# **DATA RETENTION PERIOD**

The data controller will process personal data for the time necessary for the abovementioned purposes and in any case for no longer than ten years after termination of the relationship for service purposes and for no longer than ten years after collection for marketing purposes.

#### TRANSFER OF DATA ABROAD

Personal data are stored on servers owned by Marsavia, Gabriele Marsetic sp, located in Domzale, Breznikova ulica 15, 1230 Domzale (Slovenija). The Controller, if necessary, shall be entitled to move the data to the European Union or outside of it, in accordance with the applicable legal provisions.

#### RIGHTS OF THE INTERESTED PARTIES

As a data subject, pursuant to Articles 12 et seq. of the GDPR, you have the following rights:

- obtain confirmation of the existence or otherwise of personal data concerning him/her, even if not yet recorded, and their communication in intelligible form;
- to obtain information on the origin of the personal data, the purposes and methods of processing, the logic applied in the case of processing carried out with the aid of electronic instruments, the identification details of the data controller, the data processors and the representative designated pursuant to Article 5(2) GDPR, and the persons and categories to whom the personal data may be communicated or who may become aware of them;
- obtain the updating, rectification, restriction or supplementation of data;
- obtain the deletion, transformation into anonymous form or blocking of data processed in breach of the law, including data whose storage is not necessary in relation to the purposes for which they were collected or subsequently processed;
- obtain certification that the above operations have been brought to the attention of those to whom the data have been communicated or disseminated, except where this proves impossible or involves a manifestly disproportionate effort;
- withdraw consent to the processing, without prejudice to the lawfulness of the processing based on the consent obtained before the withdrawal;
- object, in whole or in part, on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of collection;
- object to the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.

To exercise these rights, the User may send a communication to the Data Controller at the following e-mail address office@marsavia.com.

The data subject is informed that he/she has the right to lodge a complaint with the supervisory authority. For further information, please consult the institutional website of the Privacy Guarantor <a href="https://www.garanteprivacy.it">www.garanteprivacy.it</a>.

This document constitutes the Privacy Policy of this site, which will be subject to updates. Update: January 2023