

Privacy Policy

The purpose of this document is to inform Users with regard to Personal Data collected from the website and from the application www.mygpteam.com (hereinafter, the **Application**).

The Data Controller, as identified below, may amend or simply update, wholly or in part, this privacy policy informing the Users about the changes. The amendments or updates shall be binding as soon as they are published on the Application. Therefore, the User is invited to read the Privacy Policy at every access to the Application.

If the User does not accept any amendments to the Privacy Policy, the User must terminate the use of the Application and he may ask to the Data Controller to remove his Personal Data.

1. Personal Data collected by the Application

The Data Controller shall collect the following categories of Personal Data:

A. Voluntary contents and information provided by the User

- **Contact information, credentials, contents:** for example biographical data, e-mail address or postal address or other contact details, password and security information used for authentication and access to the account, personal interests and preferences and any other personal contents, etc.
- **Personal Data from Social Media:** the Users may share with the Application Data communicated to social media. The User can monitor Personal Data which the Application may have access to when granting access to its social media accounts and through the privacy settings of the relevant social media website. By way of connecting accounts managed by social media to the Application and by way of authorizing the Data Controller to have access to its Personal Data, the User gives its consent to the acquisition, processing and retention of Data provided by the same social media, in accordance with this Privacy Policy.

Any failure of the User to provide Personal Data may prevent this Application to provide its services.

The User takes any responsibility regarding Personal Data of third parties published or shared through this Application and the User ensures to be entitled to communicate or release them, holding the Data Controller harmless from any liability toward third parties.

Whether the processing of Personal Data is based on the consent of the User, he can revoke it at any time.

B. Data and contents automatically acquired while using the Application

- **Technical Data:** the computer system and the software procedures functional to this Application may acquire, in the course of their ordinary activity, any Personal Data, whose communication is implicit in the use of internet communication protocols. Such information is not collected to be associated with identified third parties, however, due to the nature of these Data, the same Data may identify Users, in the Processing and through the association, with Data held by third parties. This category includes IP addresses or domain names used by Users who connect to the Application, addresses of Uniform Resource Identifier (URI) of the requested resources, time of the request, method used submitting the request to the server, size of the file obtained, etc.
- **Usage Data:** Data may be collected relating to the use of the Application by the User, such as the pages visited, the actions performed, the features and services used by the User.
- **Geolocation Data:** the Application may collect location Data, which may be accurate or inaccurate. The precise location Data may consist in GNSS Data (Global Navigation Satellite System, such as GPS), as well as in Data which identify the nearest repeater, Wi-Fi hotspots and bluetooth, communicated when you enable products or features based on the location.

C. Personal Data collected through cookies or similar technologies

This Application uses cookies, web beacons, unique identifiers and any other similar technologies to collect Data regarding pages, visited links and other actions, which you may perform while using our Services. They are stored for being communicated back to the same websites at the next visit of the User.

The Data subject may read the complete Cookie Policy at the following address: www.mygpteam.com/cookie.php.

2. Purposes of the processing

Collected Data may be used for the following purposes:

- registration and authentication of the User
- support and contact with the User
- interaction with live chat
- comment and feedback
- access to accounts on third party services communicating Data to Facebook Spa
- visualization of content from external platforms
- external handling of payment tools through credit card, bank transfer or any other tool. The Data used for payment are acquired directly by the requested payment service provider without being processed in any way by this Application. Payments are provided

communicating Data to PayPal Spa

- storage, hosting and management of backend infrastructure
- optimization and distribution of traffic
- handling of Users database
- statistics using only anonymous data communicating Data to Google Analytics
- technical monitoring of the infrastructure for maintenance, fixing and performance improvement
- profiling of features, behaviors, User choices to provide personalized services or promotions
- sending of e-mails or newsletter and handling of mailing list
- design and/or production of marketing campaigns
- remarketing and behavioral targeting
- communication and/or transfer to third parties for promotional and commercial purposes
- Pubblicazione di un profilo visibile agli altri utenti registrati sul sito

3. Personal Data processing methods

The Processing of Personal Data is performed with IT and/or digital tools, with methods of organizations and with logics strictly related to the indicated purposes.

In certain cases, subjects other than the Data Controller which are involved in the organization of the Application may access to Data in the assistance of the management of the Application and of the activity or in the assurance of the performance of services to the User.

These subjects may be appointed, if necessary, as Data Processors by the Data Controller, may access to Personal Data of the Users whenever required and shall be contractually obliged to keep them confidential.

The updated list of Data Processors may be requested via email at the email address info@mygpteam.com.

4. Legal basis for the processing

The Data Controller processes Personal Data regarding the User whether one of the following applies:

- the User has given consent for one or more specific purposes;
- Processing is necessary for the performance of a contract with the User and/or for the performance of pre-contractual measures;
- Processing is necessary to comply with a legal obligation to which the Data Controller is subject;
- Processing is necessary for the performance of a task carried out in the public interest or for the exercise of public authority vested in the Data Controller;
- Processing is necessary for the purposes of the legitimate interest pursued by the Data Controller or by a third party.

It is always possible to ask the Data Controller to clarify the concrete legal basis of each processing.

5. Place

Personal Data are processed in the operative offices of the Data Controller and in any other place in which the parties involved in the Data processing are located. For further information, you may contact the Data Controller at the following email address info@mygpteam.com.

Personal Data may be transferred to Countries outside the EU: USA.

With respect to these Countries, an adequacy decision by the European Commission exists or, in the absence of such decision, it is possible to request further information to the Data Controller regarding any adopted appropriate safeguards as well as the means to obtain a copy of Data or the exact location where they have been stored.

6. Security of processing

The Data Processing is performed with adequate methods and tools to ensure the security and confidentiality of the relevant Data, since the Data Controller has implemented appropriate technical and organizational measures which ensure, in a provable way, that the performance of the Processing is compliant with the applicable law.

7. Period of storage of Data

The Data Controller shall store Personal Data for the time necessary to perform the purposes connected with the performance of the agreement in force between the Data Controller and the User and, in any case, Data shall not be stored beyond the duration of years 5 after the termination of the agreement with the User.

When the Processing of Personal Data is necessary for the purposes of the legitimate interests pursued by the Data Controller, Personal Data shall be stored until the performance of the relevant interest.

When the Processing of Personal Data is based on consent of the User, the Data Controller may store Personal Data until their withdrawal.

Personal Data may be stored for a longer period of time in order to perform a legal obligation or an order of the public authority.

All Personal Data shall be deleted at the end of the period of storage. At the expiration of such period, the rights of access, rectification, erasure and data portability of Data can not be exercised.

8. Automated individual decision-making

All collected Data shall not be subject to automated individual decision-making, including profiling, which may produce legal effects concerning the Data Subject or may significantly affect the Data Subject.

9. Rights of the User

The Users may exercise specific rights with respect to Personal Data processed by the Data Controller. In particular, the User has the right to:

- withdraw its consent at any time;
- object the Processing of its Data;
- access its Data;
- monitor and request the rectification of Data;
- obtain a restriction of Processing;
- obtain the erasure or removal of its Personal Data;
- receive its Data or obtain the transfer to a different Data Controller;
- lodge a complaint before the supervisory authority for the protection of personal data or start legal proceedings.

In order to exercise their rights, the Users may send a request to the contact information of the Data Controller indicated in this document. These requests are free of charge and performed by the Data Controller in the shortest possible time, in any case no later than 30 days.

10. Data Controller

The Data Controller is Flow Management & Organization Srl, with registered office in Via della Resistenza, 56 - 20090 Buccinasco (MI), Tax Code/VAT Code 09594190960, MI 2100715, e-mail info@mygpteam.com, certified e-mail flow.management srl@cgn.legalmail.it;

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