

# Personal Data Protection Commitment

## 1. Our personal data protection commitment

**Consorzio dei Proprietari del Centro Commerciale Le Terrazze**, with its registered address at La Spezia, Via Fontevivo n. 17, under the registration number 01357720117 (henceforth, 'the Company') is the Controller of the personal data of the present website's Users (henceforth 'the Users' or 'the Data Subjects'), including the respective reserved area (henceforth 'the website').

In that quality, the Company shall always undertake a responsible, loyal and transparent processing of the User's personal data. We are strongly committed to protecting your privacy and your private and personal data. We collect, save, and use your personal data strictly in accordance with the provisions of this Personal Data Protection Commitment and the applicable data protection provisions, including without limitation the European General Data Protection Regulation (GDPR) and national data protection provisions.

As part of its commitment to personal data protection, the Company shall always provide you the necessary information so that you understand the manner and the conditions under which your personal data will be processed.

The present document aims precisely to inform the Users of the necessary information regarding the processing of their personal data in connection with the use of our website.

## 2. Personal data

Personal data is all information about an identified or identifiable individual. This includes information about your identity such as your name, your e-mail address, or your postal address. Any information that cannot be directly linked to your identity (e.g. statistical details such as the number of users of the website) is, however, not considered to be personal data.

You can essentially use our website without disclosing your identity and without providing any personal data. In that case, we will merely collect general information about your visit to our website. However, some of the services offered require you to provide certain personal data. As a rule, we will process such data only for purposes connected with the use of this website, including without limitation for the provision of the desired information. Whenever personal data is collected, you are only required to provide the data that is absolutely essential. Also, you may be invited to communicate additional details, which is optional information provided voluntarily. We let you know

in each case whether the input fields are for mandatory or optional details. More specific details are provided in the relevant section of this Personal Data Protection Commitment.

There is no automated decision-making on the basis of your personal data in connection with the use of our website.

### 3. Processing personal data

We store the information provided by you on protected dedicated servers located within the European Union. Technical and organisational measures are taken to protect such servers against loss, destruction, access, modification, or dissemination of your data by unauthorized persons. Access to your data will be permitted only to a limited number of persons in charge of the technical, commercial, or editorial support of the servers. Notwithstanding regular controls, full protection against all risks cannot be provided.

Your personal data is transmitted over the Internet in encrypted form. We use SSL (Secure Socket Layer) encryption for transmission of data.

The website is only meant for, and should only be used by, those over 16 years of age. We do not process willingly and knowingly the personal data of children. If we discover that we have collected the personal data of children we will immediately proceed to its erasure. We ask that you contact us if you know that we collected or processed the personal data of children.

### 4. Disclosure of personal data to third parties

We use your personal information exclusively for providing the services that you have requested from us. Insofar as we use external service providers in performing the service requested, such external service providers will also access the data exclusively for the purpose of performing the service. By taking the necessary technical and organisational measures we ensure compliance with data protection policies and we demand the same of our external partners.

We contractually impose to our service providers acting as processors to implement adequate security measures to protect your personal data.

In the categories of recipients to whom we may communicate personal data we include:

- i. PSERVERS Consulting, Lda.
- ii. LOG.OSCON, Lda.
- iii. WIDGILABS, Lda.

And possibly other providers of the following services:

- iv. data storage (data center);
- v. conception and execution of marketing materials and supports.

- vi. supply of the website's technological structure, technical support and systems' maintenance and applications.

We may possibly transfer your personal data in the context of a business sale or a sale of the shopping center "Le Terrazze", of a merger, demerger or control change within the Company or in the context of preparing any of those events. In any case, the processing of the data by the entity to whom they have been transferred will respect the terms of the present personal data protection commitment.

Further to what informed above we will not disclose personal data to any third parties, including without limitation for advertising purposes, without your express consent. We will disclose your personal data to third parties only if you have given your consent to disclosure of the data or insofar as we are entitled or obligated to do so under legal provisions and/or administrative or judicial orders. This may include, without being limited to, giving information for purposes of criminal prosecution, in order to avert danger, or in order to enforce intellectual property rights.

## 5. [Legal basis of data processing](#)

Throughout this Personal Data Protection Commitment, we refer to the legal basis on which we process your personal data.

## 6. [Deletion of data and duration of storage](#)

We invariably delete or anonymise any personal data provided by you as soon as the purpose of storage of such data has ceased to apply. However, we may continue to store your personal data beyond that, if such storage is governed by legal provisions to which we are subject, including without limitation the legal obligation to retain business records and documentation. In such a case, we will delete or anonymise the personal data after the prescribed period of time has expired.

## 7. [Communication with us](#)

There are various contact channels for contacting us, including, but not limited to, the email on our website or to our social media networks (namely Facebook and Instagram).

### 7.1 [Contact via e-mail](#)

If you wish to contact us via e-mail, we will collect the personal data that you provide us, including, but not limited to, your name and e-mail address. We process any data

transmitted through this contact channel exclusively for the purpose of answering your enquiry or reacting to your concern.

It is up to you to decide what information you provide us in that communication. In accordance with Article 6(1)(a) of the GDPR, your consent constitutes the legal basis for processing your data.

The data will be deleted as soon as it is no longer necessary to achieve the purpose of its collection. For your personal data, this is the case once the conversation has ended. For us, the conversation ends when it can be inferred from the circumstances that the facts are finally clarified.

## 7.2 Social Media

Our website contains links to the social networks Facebook and Instagram. The links are identified by the logo of their relevant providers.

Clicking on a link opens the relevant social media web pages; this Personal Data Protection Commitment does not apply to such web pages. For further details on the provisions applicable on such web pages please refer to the relevant privacy statements of each of the providers; you can find them at:

Facebook: <http://www.facebook.com/policy.php>

Instagram: <https://help.instagram.com/155833707900388>

No personal information is forwarded to the relevant providers before clicking on the links. Calling up the linked website also constitutes the basis for data processing by the relevant website provider.

## 7.3 Newsletter

If you subscribe to our newsletter, we will use your e-mail address for advertising purposes of our own until you unsubscribe from the newsletter. We will regularly send you information by e-mail on current topics as well as e-mails informing you of special occasions such as special offers. Such e-mails may be personalised and individualised on the basis of information we have about you.

Unless you have given us your consent in writing, we use the so-called double opt-in procedure for subscription to our newsletter, i.e. we will send you our newsletter by e-mail only once you have expressly confirmed that you want us to activate transmission of the newsletter. We will then send you a notification e-mail and ask you to confirm, by clicking on one of the links contained in that e-mail, that you wish to receive our newsletter.

Your consent constitutes the legal basis for us to send you newsletters in accordance with Article 6(1)(a) of the GDPR.

If you no longer wish to receive our newsletters, simply use the unsubscribe link contained in every newsletter or send a message to us.

## 8 More information about the usage of our website

### 8.1. Information related to your computer

Every time you access our website, we will collect the following information relating to your computer, regardless of whether or not you have registered (created an account): the IP address of your computer, the inquiry of your web browser, and the time stamp of that inquiry. In addition, the status and the amount of data transmitted in the course of the inquiry are collected. We also collect product and version information about the web browser used and the operating system of the computer. The IP address of your computer is stored only for the duration of your use of our website; afterwards, it is deleted or anonymized by truncation. The remaining data is stored for a limited period of time.

We use this data to operate the website, more specifically for troubleshooting, or in order to assess the degree of utilization of the website, or to carry out adjustments or improvements thereof. Such purposes also constitute our legitimate interest in data processing in accordance with Article 6(1)(f) of the GDPR.

### 8.2. Use of cookies

Like many other websites, our website uses cookies. Cookies are small text files that are stored on your computer and store certain settings and data of your web browser for the exchange with our website. Cookies enable us to recognise your computer and to make any default settings immediately available. You can find all the detailed information about the usage of cookies that our website does on our Cookies Policy Page: <https://www.le-terrazze.it/en/cookies-policy/>

### 8.3. Google Analytics

We use Google Analytics for statistical evaluation.

Google Analytics is a web analytics service provided by Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how you use the site. The information generated by the cookie about your use of this website

will as a rule be transmitted to and stored by Google. On behalf of the Company, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity, and providing other services relating to website activity and Internet usage for the website owner. Google will not associate the IP address transmitted by your browser in connection with Google Analytics with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser software; however, please note that if you do this you may not be able to use the full functionality of this website. You can prevent the data generated by the cookie and based on your usage of this website (including your IP address) being sent to and processed by Google by downloading and installing the browser plug-in available at: <https://tools.google.com/dlpage/gaoptout?hl=en>.

For further details please visit <https://tools.google.com/dlpage/gaoptout?hl=de/> or <http://www.google.com/intl/de/analytics/privacyoverview.html> (general information on Google Analytics and data protection). Please be advised that on our web pages, Google Analytics has been extended by the code “anonymizeIp();” in order to anonymise IP addresses by deleting the last octet.

Our legal basis for the use of Google Analytics is your consent according to Article 6(1)(a) of the GDPR.

#### [8.4. Links to other websites](#)

Our online service may contain links to other websites (examples: Google, Google Maps, Google Play Store, App Store). Generally, these links are identified as such. We cannot control to what extent linked websites comply with the applicable data protection provisions. We therefore recommend that for other providers’ data protection statements, you refer to the information given on their respective websites before you call up the link.

#### [8.5. Social networks Plugins](#)

We may use Social Plugins on our websites to provide you a better experience across the digital channels. These social plugins (example Facebook Messenger BOT), imply the installation of cookies from the social network providers (Facebook, Instagram, Twitter, etc.) on your browser. In order to assure that you are informed of it and accept it, we will ask for your consent before loading any cookie or before presenting you any component or page from such providers.

More details about our Personal Data Protection Commitment for Fan Pages are available [here](#).

## 8.6. Browser Notifications (web push notifications)

We may be sending you Web Push Notifications using OneSignal.

The Web Push Notifications that we may be sending you are about our exclusive discounts and promotions, sweepstakes, news, events and information on other activities promoted by the Company or by its respective partners.

Web Push Notifications are notifications that can be sent to a user via the browser (Chrome, Opera, Safari, etc). These are alert style messages that slide in at the top or at the bottom right hand corner of the screen when the browser is seen in computer, or that are presented in the top or middle of the screen when the browser is seen in mobile devices.

One Signal is a push notification Service provided by One Signal, a U.S. company located at 2850 S Delaware St Suite 201, San Mateo, CA 94403. OneSignal uses a specific cookie, which is a text file placed on your computer, in order to be able to send you the notifications via Browser.

For further details please visit: <https://onesignal.com/blog/product-policy-updates-for-gdpr/>; <https://documentation.onesignal.com/docs/handling-personal-data>. Please be advised that OneSignal will automatically not collect IP Addresses from all EU Users.

We will ask for your consent to send you Web Push Notifications. We will not send you Web Push Notifications unless you give us consent and you can give and withdraw your consent at any time.

In accordance with Article 6(1)(a) of the GDPR, your consent constitutes the legal basis for such processing of your personal data.

## 9 How May You Exercise your Data Protection Rights?

### 9.1 Rights of persons concerned

You have extensive rights with respect to the processing of your personal data. The data subject may exercise his or her right by contacting the company at the address: [dataprotection@le-terrazze.it](mailto:dataprotection@le-terrazze.it).

The data subject may exercise, under the terms of the law, the following rights:

- **right of access;**
- **right to rectification;**
- **right to restriction of processing;**
- **right to withdraw the consent;**

- **right to data portability;**
- **right to object;**
- **right to erasure (or right to be forgotten)**

He or she is also entitled, under the terms of the law, to the right to lodge a complaint to the Autorità Garante per la Protezione dei Dati Personali, con sede in Piazza di Monte Citorio n. 121 - 00186 Roma, indirizzo E-mail: [garante@gpdp.it](mailto:garante@gpdp.it)

## 9.2 Additional information regarding the withdrawal of consent and objection

You may at any time withdraw your consent with future effect. The withdrawal of the consent does not affect the legality of any processing performed on the basis of such consent given up until the withdrawal thereof.

Insofar as the processing of your personal data is not based on consent given by you but on another legal basis, you can object to the data processing. Your objection will lead to a review and, if necessary, to termination of the data processing. You will be informed of the outcome of the review and – if the data processing is to be continued nonetheless – you will receive further information from us on why the data processing is admissible.

## 10 Updates to this Data Protection Commitment

The terms of the present commitment may be altered or updated, which will be subject to disclosure on our website. Any revision of this Data Protection Commitment is identified by the date specified (see below). We reserve the right to amend this Data Protection Commitment at any time with effect for the future. Amendments will be made, among other things, in case of technical adjustments of the website or changes of the data protection laws. The Data Protection Commitment as amended from time to time is always made available directly through our website. We recommend reading the Data Protection Commitment on a regular basis.

## 11 Document changes

Date	Version	Country	Comments
17-05-2018	1.0	IT	Initial version
27-07-2018	2.0	IT	Update to the contacts
20-11-2020	3.0	IT	Additional information about Cookies, Google Analytics, Browser Notifications and Social Media
28-07-2021	4.0	IT	Amendment to the legal basis to send newsletter