

## **Data Treatment Owner**

BARTES LTD

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**Email address of the DPO:** nikolay.bartesltd@gmail.com

## **Types of collected Data**

Among the Personal Data collected by this Website, either independently or through third parties, there are: name, surname and email.

Full details of each type of collected data are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the data is collected.

The Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically during the use of this site.

Unless otherwise specified, all the Data requested by this website are mandatory. If the User refuses to communicate them, it may be impossible to provide the Service. In case that the website indicates some Data as optional, Users are free to refrain from communicating such Data, without any consequence on the availability of the Service or on its operation.

Users who have doubts about which data are mandatory, are encouraged to contact the owner.

Any use of Cookies - or other tracking tools - by the website or third-party service owners used by the site, unless otherwise specified, it's intended to provide the Service requested by the User, in addition to the additional purposes described in this document and in the Cookie Policy, if available.

The User assumes the responsibility of the Personal Data of third parties obtained, published or shared through the website and guarantees to have the right to communicate or disseminate them, freeing the Owner from any responsibility towards third parties.

## **Mode and place of treatment of the collected Data**

### **Manner of Treatment**

The Data Owner uses appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data.

Processing is carried out using IT and / or telematic tools, with organizational methods and logic strictly related to the purposes indicated. In addition to the Owner, in some cases, other parties involved in the organization of the site (administrative, commercial, marketing, legal, system administrators) or external parties (such as third party technical service providers, postal couriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, Data Supervisor by the Owner. The updated list of Data Supervisor may always be requested from the Data Owner.

### **Legal basis of the Treatment**

The Owner processes Personal Data relating to the User if one of the following conditions exists:

- the User has given consent for one or more specific purposes; Note: in some jurisdictions the Data Controller may be authorized to process Personal Data without the User's consent or another legal basis

specified below, until the User objects ("opt-out") to such treatment. However, this is not applicable if the processing of Personal Data is regulated by European legislation on the protection of Personal Data;

- the processing is necessary for the execution of a contract with the User and / or the execution of pre-contractual measures;
- processing is necessary to fulfill a legal obligation to which the Owner is subject;
- processing is necessary for the performance of a task of public interest or for the exercise of public powers vested in the Data Controller;
- processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties.

It is in any case always possible to ask the Owner to clarify the concrete legal basis of each treatment and in particular to specify if the treatment is based on the law, provided for by a contract or necessary to conclude a contract.

## **Place**

The Data are processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For more information, contact the owner.

The User's Personal Data may be transferred to a country other than the one in which the User is located. To obtain further information on the place of treatment, the User can refer to the section on the details on the processing of Personal Data.

The User has the right to obtain information regarding the legal basis of the transfer of Data outside the European Union or to an international organization of public international law or constituted by two or more countries, such as the UN, as well as regarding the security measures adopted by the Data Controller to protect the Data.

If one of the transfers described above takes place, the User may refer to the respective sections of this document or request information from the Data Controller by contacting him at the details indicated at the beginning.

## **Period of conservation**

The Data is processed and stored for the time required for the purposes for which it was collected.

Therefore:

- The Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of this contract is completed.
- The Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until such interest is satisfied. The User can obtain further information on the legitimate interest pursued by the Owner in the relevant sections of this document or by contacting the Owner.

When the treatment is based on the consent of the User, the Owner may keep the Personal Data for longer until such consent is revoked. Furthermore, the Data Controller may be obliged to keep the Personal Data for a longer period in accordance with a legal obligation or by order of an authority.

At the end of the storage period the Personal Data will be deleted. Therefore, upon expiration of this term the right of access, cancellation, rectification and the right to the portability of the Data can no longer be exercised.

### **Purposes of the processing of the collected data**

The User Data is collected to allow the Owner to provide its Services, as well as for the following purposes: Contacting the User.

To obtain further detailed information on the purposes of the processing and on the Personal Data that are concretely relevant for each purpose, the User may refer to the relevant sections of this document.

### **Details on the treatment of Personal Data**

Personal Data is collected for the following purposes and using the following services:

- **Contact the user**

### **User Rights**

Users can exercise certain Rights with reference to the Data treated by the Owner.

In particular, the User has the right to:

- **revoking consent at any time.** The User can revoke the consent to the processing of his Personal Data previously expressed.
- **oppose to the treatment of own data.** You may oppose to the processing of your data when it takes place on a legal basis other than consent. Further details on the opposition right are indicated in the section below.
- **access their own data.** The User has the Right to obtain information on the data processed by the owner, on certain aspects of the processing and to receive a copy of the data processed.
- **check and ask for rectification.** The User can verify the correctness of his / her Data and request its updating or correction.
- **obtain the treatment limitation.** When certain conditions are met, the User can request the limitation of the processing of his / her Data. In this case, the Owner will not process the Data for any other purpose than their storage.
- **obtain the cancellation or removal of the Personal Data.** When certain conditions are met, the User can request the deletion of their Data by the Owner.
- **receive the data or have it transferred to another owner.** The User has the right to receive his / her Data in structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain its transfer without obstacles to another holder. This provision is applicable when the Data is processed by automated tools and the processing is based on the consent of the User, on a contract to which the User is a party or on contractual measures connected to it.
- **make a complaint.** The User can make a complaint to the competent personal data protection supervisory authority or act in court

## **Details on the Opposition Right**

When Personal Data is processed in the public interest, in the exercise of public authority over which the Data Owner is invested or to pursue a legitimate interest of the Data Owner, Users have the right to oppose the processing for reasons connected to their particular situation.

Users are reminded that, if their Data is processed for direct marketing purposes, they may oppose the processing without giving any reason. To find out if the Data Controller is processing data for direct marketing purposes, Users can refer to the respective sections of this document.

## **How to exercise rights**

To exercise User Rights, Users can address a request to the contact details of the Owner indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible, in any case within one month.

## **Further information on treatment**

### **Defence in court**

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its eventual establishment for the defence against abuse in the use of this Application or of the connected Services by the User.

The User declares to be aware that the Owner may be required to disclose the Data by order of the public authorities.

### **Specific information**

At the request of the User, in addition to the information contained in this privacy policy, the site may provide the User with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

### **System log and maintenance**

For needs related to operation and maintenance, the site and any third party services it uses may collect system logs, that is files that record the interactions and that may also contain Personal Data, such as the User IP address.

### **Information not contained in this policy**

Further information in relation to the processing of Personal Data may be requested at any time from the Data Owner using the contact details.

### **Changes to this privacy policy**

The Data Controller reserves the right to make changes to this privacy policy at any time by informing the Users on this page and, if technically and legally feasible, by sending a notification to the Users through one of the contact details in possession of the Owner. Please therefore consult this page regularly, referring to the date of the last modification indicated at the bottom.

If the changes involve processing whose legal basis is consent, the Owner will collect the User consent again, if necessary