

Privacy Policy

This Privacy Policy has the intention to describe the mode of application management of Atavisticapp (hereinafter referred to as "Application") in relation to the processing of personal data for those users who benefit from the services offered.

This notice is made pursuant to Art. 13 of the Privacy Code in matter of protection of personal data referred to in Legislative Decree No. 196/2003 (hereinafter referred to as the "Privacy Code"), the measure adopted by the Authority "Identification of simplified procedures for the information and the acquisition of consent for the use of cookies", 8 May 2014, and the Recommendation n. 2/2001 which has been adopted on 17 May 2001 by the European authorities for the protection of personal data, gathered in a group established by meaning of Art. 29 of directive n. 95/46/CE.

The Proprietor may modify or simply update, in whole or in part, the present Privacy Policy. Changes and updates will be binding as soon as published on the application. The user is therefore invited to read the Privacy Policy everytime they access to the application.

- **Fundamentals**

Personal data are handled according to the principles of relevance, legality and correctness as foreseen by the Privacy Code, through the use of appropriate security measures and, where provided, as a consequence of the conferral of the consensus on the part of users. These data are kept in a form which allows to identify the person concerned, for a period of time not greater than that necessary, for the purposes they were collected or subsequently processed for.

- **Holder and place of treatment of data**

Within the meaning of Art. 28 of the Privacy Code, the proprietor of the application and of the treatment of data is Atavisticapp S.r.l., registered office in Via Casal Bruciato 53, 00159 Rome, VAT number 14178111002, 1501896, Social Capital 10,000 Euro, e-mail address Info@atavistic.it, Certified Electronic Mail Atavisticapp@pec.it, (hereinafter the "Owner").

The data are processed at the owner's operational sites and in any other place in which the parties involved in the treatment are localized, and are handled by the personnel in charge of processing them, or by any responsible for occasional maintenance operations. For more information, contact the owner.

- **Purposes**

Except for those cases in which the communication of personal data is required by law obligations or is strictly relevant and necessary for the fulfilment of the requirements or contractual obligations for the execution of the service, personal data are provided voluntarily and optionally by users at the time of activation of the service, for the following purposes:

1. Registration and authentication of the user;
2. Types of personal data processed.

- **Personal Data**

The personal data can be inserted by the user voluntarily or collected automatically during the use of this application. The failure on the part of the user to some personal data could prevent this application from delivering its services.

The user assumes the responsibility of personal data to third parties published or shared via this application and ensures that they have the right to communicate or merge them, freeing the holder from any liability toward third parties.

- **Navigation Data**

During their normal use, computer systems and software procedures used to operate with this Application acquire some personal data, whose transmission is implicit in the use of internet communication protocols.

This information is not collected to be associated with identified stakeholders but, by their own nature, could allow to identify the user through elaborations and associations with data held by third parties.

This category includes the IP addresses or domain names used by users who connect to the site, the addresses in the URI (Uniform Resource Identifier) 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, etc.

These data are used for the purpose of obtaining anonymous statistical information and Aggregated Application usage and to check its correct functioning and reside permanently on third party servers (hosting provider). The data could be used to ascertain responsibility in case of hypothetical computer crimes to the detriment of the application.

- **Cookies**

No personal data of the users is acquired by the application. No use is made of cookies for the transmission of information of a personal nature, nor so-called persistent cookies of any kind are used, or users-tracking systems.

The use of session cookies (which are not stored in a persistent manner on the user's computer and vanish with the closure of the browser) is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary to allow a safe and efficient exploration of the site.

The session cookies used in this application avoid the recourse to other IT techniques which could potentially compromise the confidentiality of user's navigation and do not allow the acquisition of personal identification data of the user.

- **Links to Third Party Sites**

The holder may submit or offer products or services of third parties on their application. Pertaining to the privacy policy, the sites of the said subjects adopt different criteria and are independent from ours. Therefore, the holder declines any responsibility for the content or activities of such linked sites.

- **Treatment mode**

The treatment of the data can consist, as well as in their collection, even in their recording, storage, modification, disclosure, cancellation, diffusion, etc.

It will be carried out both with the use of the paper support, both with the aid of electronic instruments informatics and telematics or innovative anyway, according to suitable methods and tools to ensure the security and confidentiality of data in accordance with the provisions of Arts. 31 and following of the Privacy Code, pertaining to "minimum security measures for the treatment of personal data" aimed at ensuring a minimum level of protection of personal data.

In particular, all technical, computer, managing, logistic and procedural safety measures will be adopted, as provided for by the Privacy Code, from the "Annex B" the same decree (so-called Technical Disciplinary), and from the various measures subsequently adopted to integration, in order to guarantee at least the minimum level of data protection provided for by the law.

In addition, the methodologies applied guarantee that access to the data is permitted only to those people in charge of the treatment on our part.

- **Rights of interested parties**

Users have the right to contact us for any information about their personal data, to obtain confirmation of the existence of the same data and to know their content and origin, verify its accuracy or request its integration or updating, or rectification, cancellation, transformation in anonymous form or block in violation of the law, and to oppose in any case, for legitimate reasons, to this treatment.

Requests may be transmitted in the following ways:

- E-mail, sent to the address Support@atavistic.it;
- Registered mail, that will need to be shipped to the address Atavisticapp S.r.l., Via Casal Bruciato 53, 00159 Rome - Italy.

- **Definitions**

Application: site, app, instrument hardware or software through which personal data of the users are collected.

Personal data: any information related to a natural person, even indirectly identified or identifiable, by reference to any other information including a personal identification number.

User: the individual using this application, which must coincide with the person concerned or must be authorised from the former, and whose personal data are the subject of the treatment.

Responsible of the treatment: a person, legal, public administration and any other institution, association or body appointed by the holder to the treatment of personal data, as provided by the present privacy policy.

Holder of the treatment: a person, legal, public administration and any other institution, association or body which compete, even together with another holder, decisions pertaining to aims, modalities of treatment of personal data and tools used, safety profile, in relation to the functioning and the enjoyment of this application.

The holder of the treatment, except as otherwise specified, is the owner of this application.

Treatment of personal data: according to the Italian law, it indicates any operation or set of operations, carried out even without the aid of electronic tools, concerning the collection, recording, organization, conservation, consultation, elaboration, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, erasure and destruction of data, even if not recorded in a data bank.

04/09/2018

