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PRIVACY POLICY

This page describes how the site is managed by VAIA Srl, the holder of the relevant navigable domain at the url: <http://www.vaia.eu> corresponding to the home page of the portal, including other suffixes where active and with possible redirect to this site, as well as the owner of the processing of your personal data.

This information is provided to those who interact with VAIA's web services by browsing the portal, regardless of whether they request information, updates, and/or purchase our products.

This document, therefore, provides you with all the information you need to understand how we collect and use the information that identifies the users of our portal, and in particular it contains important indications on navigation security, organizational and technical choices regarding privacy and the control systems adopted.

Whenever you would like to interact with VAIA, request information or be updated on the initiatives promoted by VAIA and voluntarily provide personal data, by filling in one of the contact forms set up on the site, you will be presented with a specific information notice for the processing of the data you provide (Contact Section, Ask a Question, Become a Partner, Join the Community or others).

This information is provided only for the reported site and not also for other websites that may be consulted by the user through links.

The information is also inspired by Recommendation No. 2/2001 that the European authorities for the protection of personal data, meeting in the Group established by art. 29 of Directive No. 95/46/EC, adopted on May 17, 2001 to identify certain minimum requirements for the collection of personal data online, and, in particular, the manner, timing and nature of the information that data controllers must provide to users when they connect to web pages, regardless of the purpose of the connection.

This Privacy Policy has been appropriately formulated to comply with the principles of the GDPR At any time during your navigation, by linking to the home page, you can return to view this page describing our Privacy Policy.

DATA CONTROLLER In connection with the consultation of this site and should you request information or support one of our projects or wish to become our partner or purchase our products, data relating to identified and identifiable persons will be processed.

The holder of their treatment is VAIA s.r.l., with headquarters in 38051 Borgo Valsugana (TN) at Via Puisle, 23, in the person of the legal representative p.t, Ateco Code: 479110, tel. 0461.842063 mobile 340.7730126 - 340.8972281 mail. info@vaia.eu, PEC vaiasrl@pec.it



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RESPONSIBILITY AND PERSONS IN CHARGE

In application of current legislation, the Data Controller is VAIA Srl.

In order to carry out its activities and to provide better customer service, VAIA may use collaborators. Such persons, where they process personal data, have been appointed as data processors and have been authorized with precise limits, privileges, purposes and instructions limited to their tasks.

For technical or organizational needs, VAIA makes use of the work of third parties including individuals or companies operating as wood craftsmen or computer and telematic services, administrative and accounting services, postal and archiving services, subjects belonging to its commercial network, outsourcers, graphic designers, videomakers and others. These subjects may take on the role of external Data Controllers or operate completely independently as separate Data Controllers or, if the conditions ex art. 26 of EU Reg. 2016/679 are met, as Co Data Controllers. When such individuals carry out processing on our behalf and act with our coordination and authority, they have been formally qualified as External Managers, have received and accepted in writing the relevant appointment and have committed themselves to carry out the processing related to the fulfillment of their assignment in full compliance with the instructions received, guaranteeing the implementation of the obligations of confidentiality and compliant processing, as well as adopting any technical and organizational measures required by current regulations. For example, VAIA makes use of companies and professionals who take care, on its behalf, of web marketing and social communication and who, by reason of their assignment, may have access to the mailing lists or other personal data of those who interact with the website (however, stored only on the server of the Company holding the mailup platform, where enabled and possibly imported by the Owner).

The list of the aforementioned subjects, upon request, is available to interested parties.

In any case, the communication and possible dissemination of personal data takes place only in accordance with the provisions of the GDPR, with the consent of the data subjects or in cases of law according to the discipline contained in Articles 6 and 7 of EU Reg. 2016/679

Under no circumstances are data disseminated or disclosed to an unconditional number of people.

SYSTEM ADMINISTRATOR

The function of System Administrator is carried out by an external resource, appropriately selected and appointed on the basis of demonstrated competence, who ensures the implementation of all operations of custody, storage, recovery and safeguarding of data and the computer systems where they are contained, also in accordance with the Recommendation issued by the Privacy Guarantor in 2009 and subsequent amendments and supplements.



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This figure will support VAIA in the event of a data breach that has involved computer systems or this web portal.

PLACE OF PROCESSING OF PERSONAL DATA AND PERIOD OF DATA STORAGE

Processing related to the web services of this Portal takes place at the aforementioned registered office, in Borgo Valsugana and/or limited to the data processed on our behalf by the External Managers at their respective offices.

We remind you that these entities are also subject, like us, to the requirements of EU Reg. 2016/679 and have guaranteed us compliance with identical standards of security and confidentiality.

The hosting of the Portal resides at Seeweb which has farms in Italy.

Please note that Seeweb, for interoperability or efficiency/continuity needs of its systems, may also use the data centers allocated at its farm in Europe, which is however subject to GDPR.

The Owner has adopted cloud solutions, only for special sharing needs or to support e-commerce. In particular, it uses the capabilities of Dropbox, which, for European users in view of GDPR compliance, has servers in Europe, allocated in Germany, and Google Drive, whose farm is allocated in Belgium (Europe-west-1b).

Both provide for the transfer of browsing data and data, including personal data, that transit on the site abroad in encrypted mode with SSL protocol

Google in the Data Processing Amendment G Suite, art. 4 et seq. expressly declares that it processes the data in accordance with the European regulations on Privacy, ensuring the availability and integrity of the data, as recommended by the Privacy Guarantor in 2012, by the Group of 29 in the Guidelines on the use of the cloud No. 5/2012 (July 2012) and by the European Commission in Communication COM (2012) 529 of 27.09.2012.

In addition, Google has ISO27018 Certification for its Cloud Platform, which guarantees the compliance of data processing with Italian and European requirements.

Finally, both Google Inc. and Dropbox Inc. have joined the Privacy Shield and hold appropriate certification, which is valid.

Vaia, should it decide to make use of cloud technology for its systems, will select the provider of such service, ensuring that the virtual platform resides in an EU country that offers adequate guarantees regarding the proper processing of data, including in accordance with the parameters of Article 46 EU Reg. 2016/679.

Data about you will be kept only as long as strictly necessary; in particular:

browsing data only for the duration of the connection session;

the data you freely provided in filling out the contact form only for the time necessary to reply to you or to process the purchase order you will have formulated (and the related billing services



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etc..) or up to the maximum limit allowed for the storage of data for promotional purposes
VAIA may proceed to store your data for a longer period of time when specific regulatory provisions (e.g. for tax regulations) or to protect itself judicially (e.g. data proving that you have given your consent to processing), limited to the maximum limit allowed for the storage of data for promotional purposes.

data for a longer period when required by specific regulatory provisions (e.g., for tax regulations) or for judicial protection (e.g., data proving that you have given consent to the processing), limited to the statute of limitations or forfeiture of the right to sue or resist in court for contractual or non-contractual liability (5 or 10 years).

Data in the electronic archives are stored at the hosting company that maintains the website portal and its database online on behalf of VAIA and are maintained only by the technical personnel assigned by the hosting company to the processing or by any persons in charge of occasional maintenance operations. Data used for marketing purposes will be retained for a period not exceeding 2 (two) years from the date of collection of consent, unless the Data Controller has assessed and duly justified, on the basis of specific characteristics of the product and/or target clientele, that it is necessary to extend the processing to a longer period (in any case not exceeding 5 years) since a processing limited to only two years would not allow the purposes for which the data were collected to be fulfilled.

PRIVACY SERVICE AND EXERCISE OF THE RIGHTS OF THE INTERESTED PARTY

You may contact the Privacy Service of VAIA Srl, reporting to the Data Controller to obtain feedback in the event of the exercise of the rights under Art. 15 et seq. EU Reg. 2016/679 and to acquire any further information on the subject of privacy, as well as for any information regarding the processing of personal data and, in particular, to:

obtain confirmation of the existence or otherwise of personal data concerning you, even if not yet registered, and obtain the communication in intelligible form of such data;

obtain information on the origin of the personal data, the purposes or methods of processing, as well as the logic applied in the case of processing carried out with the aid of electronic instruments
obtain a

list of the subjects or categories of subjects to whom the data are communicated or who become aware of the data in their capacity as Data Processors or Persons in Charge;

request the updating or rectification of the processed data and, in case of processing in violation of the law or in the cases referred to in Art. 17 of Reg. EU 2016/679, the cancellation (right to be forgotten) or transformation into anonymous form or blocking; request the limitation of the processing of data;

request, if you have an interest, the integration of the data concerning you;



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oppose, in whole or in part, the processing of personal data for legitimate reasons, even if pertinent to the purpose of collection;

object to the processing of personal data provided for commercial purposes or interactive commercial communication and to be informed by the owner, no later than the time at which the data are communicated or disseminated, of the possibility of exercising this right free of charge; to have confirmation as to whether or not an automated decision-making process, including profiling as referred to in Art. 22(1)-(4) of EU Reg. 2016/679, and at least in such cases information about the logic used, as well as the importance of and the expected consequences of such processing;

request portability of data concerning you to another Data Controller;

request to be notified if an event occurs that may have resulted in a breach of your data, if such event has resulted in a high risk to your rights and freedoms, under the conditions of Art. 34 of EU Reg. 2016/679.

Requests can be sent in paper form to the Holder's office or by e-mail to the address published on the website.

Rights referring to deceased persons may be exercised by anyone with an interest in them, as well as, of course, by legitimate heirs.

In exercising rights, you may grant, in writing, proxy or power of attorney to individuals or associations, provided that such proxies or powers of attorney are adequately documented.

TYPE OF DATA PROCESSED

DATA VOLUNTARILY PROVIDED BY THE USER

Should you contact our Company by e-mail, it will be necessary to acquire the sender's address, which is necessary to respond to inquiries, as well as any other personal data included in the message.

We need your data to enable us to send you Deferred Response Information (all of which is processed by e-mail or by telephone interview) and should you have requested to be contacted again to describe the characteristics of our product and/or to better explain the projects in which you have shown interest; to contact you again should you have sent your data and you are interested in becoming our partner or receiving information about our events or other contact you for any problems or clarifications that may be appropriate to better manage your order; keep you updated regarding the initiatives to which you have joined.

Where the request for information on one of the products or other mentioned in the site leads to a subsequent contact with our representatives, from that moment all the offer and eventual purchase will scrupulously follow the dictates enshrined in the Consumer Code for contracts



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negotiated at a distance and/or off-premises and, prior to the request for the product, you will find all the useful information, the mode of use and any other conditions governing the purchase. Should it become necessary to store your data in order to offer you a better pre- or post-sale service, you will be asked for your consent and, in any case, the data will be used solely for the execution of the contractual relationship and the consequent charges (tax or judicial), for accounting requirements or to proceed to charges connected with the purchase, as well as for legal obligations or, in any case, for permitted purposes (statistical purposes, verification of the proper functioning of the electronic tool, investigation of hypothetical computer crimes to the detriment of the site...).

Your data will not be disclosed.

You will be asked to provide data for the sending of promotional material or newsletters only in the event that you have expressly requested or authorized, in writing or by specific point & click, their sending and in relation to the services for which you have shown interest. In the event that in the information pursuant to Art. 13 EU Reg. 2016/679 you have denied consent to the sending of promotional material, but have subsequently agreed to the sending of newsletters or have decided to join our Community, by giving us your email address we will consider that the dissent initially communicated to us has been overcome and, subject to rectification, you have consented to the processing of your data also for commercial purposes.

Please note that the data subject's right to object, set out in the previous paragraph, for direct marketing purposes by email, unmanned calls or other automated mode extends to traditional ones and that, in any case, the possibility for the data subject to exercise the right to object even partially remains unaffected.

Therefore, you may decide to receive only communications by traditional means or only automated communications or neither type of communication.

In any case, however, if you no longer wish to receive any promotional communication from VAIA, you may notify us by sending an email to the contact address given on the site and we will delete your address from the archive.

The use of spamming is completely outside the policy and ethics of VAIA.

NAVIGATION DATA

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

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



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This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used in submitting 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 about the use of the site and to check its proper functioning and is deleted immediately after processing. You can find more information about this by consulting the Legal Disclaimers, in the appropriate sections "IP Addresses/Statistics" and "Adoption of Security Measures."

COOKIES

In compliance with current legislation, VAIA has chosen to provide a special notice regarding the possible use of cookies. Please read it so that you can navigate safely and knowingly.

METHODS OF PROCESSING AND

PURPOSES VAIA Srl processes the data acquired, guaranteeing their appropriateness, relevance to the purposes for which they were collected, completeness, and their periodic updating. VAIA undertakes to treat your data with the utmost confidentiality, care and diligence, in accordance with the current provisions on the protection of personal data

In particular, we inform you that:

- (a) the processing we intend to carry out with regard to the personal data of the data subjects will consist of their collection, recording, organization, storage, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, deletion and destruction, as well as the combination of two or more of these operations;
 - b) the processing of personal data will have the purposes inherent to the owner's business activity, in relation to the proposed products or environmental protection projects we pursue ;
 - c) the above processing will be carried out using both paper and computer media;
 - d) VAIA does not carry out profiling and has no automated decision-making process. VAIA makes use of a plugin that will allow the extraction and collation of contact details and information from contact forms. This data will be acquired as provided by the user, without aggregation, breakdown or other scoring or profiling procedures except for internal statistical purposes;
 - e) VAIA makes use of direct marketing, lead generation and advertising techniques. If you would like more information about this, you can contact the Data Controller at the contact details given
- Personal data are processed by suitable means (paper or automated) for the time strictly



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necessary to achieve the purposes for which they were collected.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access. VAIA, for

example, has implemented an anti-spam and anti-cheat plugin (Wordfence from the WordPress repository), firewall and antivirus and uses the reCaptcha application against bots

VAIA has taken all the minimum security measures required by law.

In addition, drawing inspiration from the main international standards, it has taken additional security measures to minimize risks pertaining to the confidentiality, availability and integrity of personal data collected and processed.

PROCESSING OF SENSITIVE DATA

The forms prepared on the site by VAIA do not provide for the request of any sensitive data.

In the event that, in the Become a Partner Section, a curriculum vitae and/or other personal

forms are sent containing particular personal data, i.e. - pursuant to art. 9 and 10 EU Reg.

2016/679 - data concerning the state of health, political, religious or trade union opinions, (or membership in movements or organizations of that nature), judicial data and data concerning

racial or ethnic origins - and not bearing an explicit written consent to the processing of such data, the immediate destruction of such document will be carried out, in order not to incur the penalties provided for by law.

CHANGES TO THESE PRIVACY POLICIES

VAIA periodically reviews its privacy and security policies and, where appropriate, revises them in relation to regulatory, organizational or technological changes.

If the policies change, the new version will be posted on this page of the website.

QUESTIONS, COMPLAINTS, AND SUGGESTIONS

Anyone who is interested in more information, to contribute their own suggestions, or to make complaints or disputes about the organization's privacy policies or the way VAIA processes personal data, can do so by writing to the e-mail address published on the site.

We remind you, however, that at any time you have the right to file a complaint with an Italian Supervisory Authority (Garante della Protezione dei dati personali, www.garanteprivacy.it).