

Privacy notice on the processing of personal data provided via email addresses

Information notice pursuant to Article 13 of Regulation (EU) 2016/679

Pursuant to the applicable privacy legislation (Article 13 of Regulation (EU) 2016/679 – GDPR), Movyon S.p.A. hereby provides the following notice regarding the processing of personal data supplied by Users when submitting requests for information or clarification, suggestions, or reports concerning the Company’s services and products through the Form available on the Company’s website or on dedicated pages hosted on websites owned by third parties. In the latter case, Users are invited to consult the relevant privacy notices issued by such third parties regarding their processing of personal data.

1. DATA CONTROLLER

The Data Controller is Movyon S.p.A., with registered office at Via A. Bergamini, 50 – 00159 Rome, Italy.

The Data Controller has appointed a Data Protection Officer (“DPO”), domiciled for the purposes of the office at the registered office of the Data Controller.

2. CATEGORIES OF PERSONAL DATA PROCESSED

The personal data processed by Movyon S.p.A. include common personal data such as first name, last name, and email address.

3. PURPOSES AND LEGAL BASIS OF THE PROCESSING

Your Personal Data will be processed by Movyon in accordance with the principles of necessity, data minimization, lawfulness, fairness, proportionality, and transparency exclusively for the following purposes:

- a) managing your request for information;
- b) providing you, at the email address indicated, with commercial information and newsletters relating to products and services similar to those you have requested (so-called “soft spam”);
- c) sending advertising material and carrying out promotional, marketing, and/or direct sales activities relating to products and/or services sold and/or provided by Movyon.

The provision and subsequent processing of Personal Data referred to under letter a) above are necessary for the proper management of requests for information submitted through the Form.

The legal basis for the processing of your Data for the purpose referred to under letter b) is Movyon's legitimate interest pursuant to Article 6(1)(f) GDPR, without prejudice to your right to object to such processing at any time, easily and free of charge. In particular, you may object at any time to receiving such communications by clicking on the link included at the bottom of the relevant email or by contacting Movyon's DPO using the contact details indicated in Section 1 above.

The legal basis for the processing of your Data for the purposes referred to under letter c) is your prior express consent pursuant to Article 6(1)(a) GDPR.

The contact methods used for the direct marketing activities referred to under letter c) above will be automated in nature (via email, push notifications, bulk messaging tools, etc.). In any case, you may withdraw your consent, including partially, for example by consenting only to traditional contact methods.

Should you consent to the profiling activities referred to under letter c) above, such profiling will involve automated processing aimed at placing you within categories of individuals sharing homogeneous characteristics (in terms of request preferences), based also on any market analyses in which you may have participated.

4. METHODS OF PROCESSING

Personal data are processed in compliance with the applicable regulations through manual, IT, and telematic tools, according to logic strictly related to the purposes indicated above, in such a way as to ensure the security and confidentiality of the data.

5. DATA RETENTION PERIOD

Your Personal Data will be retained only for the time strictly necessary, in accordance with the principle of data minimization (Article 5(1)(c) GDPR), and in any case for no longer than 5 years from the date of collection.

6. DATA RECIPIENTS

Within Movyon S.p.A., only individuals specifically appointed by the Data Controller and authorized to carry out processing operations related to the activities described above may become aware of the personal data provided.

The aforementioned data may also be disclosed to third parties (parent companies/subsidiaries involved or third-party companies) required to process the information for the same purposes referred to in Section 3, which shall be appointed, where necessary, as “Data Processors”.

Under no circumstances will your personal data be disclosed to the public.

7. DATA SUBJECTS’ RIGHTS

Please note that Articles 15–22 GDPR grant data subjects the right to exercise specific rights. In particular, data subjects may obtain from the Data Controller: access to their personal data, rectification, erasure, restriction of processing, withdrawal of consent, and data portability.

Data subjects also have the right to object to the processing of their personal data. Where the right to object is exercised, the Data Controller reserves the right not to comply with the request and therefore to continue the processing where compelling legitimate grounds for processing exist which override the interests, rights, and freedoms of the data subject.

The above rights may be exercised by submitting an informal request to the Data Protection Officer (DPO) at the following certified email address (PEC): dpo@pec.movyon.com, using the specific forms made available by the Data Controller on the website www.movyon.com.

Please also note that you may lodge a complaint pursuant to Article 57(f) GDPR with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali).

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