

Privacy Policy

Thank you for choosing Worldz! We have written this Privacy Policy to help you understand what information we collect, the purposes for which we collect it, how we use it, and what choices you have regarding your information.

This information is provided by Wiralex Srl, registered office Via Crespi, 25 Albino (BG), registered with the Chamber of Commerce of Bergamo with VAT no. 04108630163; share capital of Euro 27,030.61; Telephone 0039 035 761172; Email: info@worldz.net, acting as Data Controller ("Wiralex").

This document applies to any type of processing of personal data carried out by Wiralex through the website www.worldz.net or through the websites of our business partners (indifferently, the "Site") or any type of application (such as, for example, the application that can be downloaded on your phone) owned by Wiralex (the "Applications").

Wiralex offers services that allow you to receive discounts through your interactions on social media, such as the Worldz service ("Services").

This Policy is prepared in accordance with the provisions of Regulation (EU) 2016/679 of the Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data ("GDPR").

1) Personal identifiable information we collect and the purposes for which we use it

When you register on the Site (and therefore also on our business partners' sites) or register for one of the Applications to become a member of Worldz, or when you use one of the Wiralex Services or Applications, we may ask you for personal information (also referred to below as personally identifiable information). This refers to information about you that can be used to contact or identify you ("Personal Information").

The legal basis for this processing may from time to time consist of (i) the need on the part of Wiralex to perform the agreement with you or to carry out pre-contractual measures taken at your request (Art. 6, paragraph 1, lett. (b) of the GDPR); (ii) in the need to fulfil a legal obligation incumbent on Wiralex (Art. 6, para 1, letter c) of the GDPR); (iii) in the pursuit of a legitimate interest of Wiralex, this provided that your interests or fundamental rights and freedoms do not prevail (Art. 6, para 1, letter f) of the GDPR).

The legal basis of each processing operation will be specified in the remainder of this notice.

Registration

The Personal Information required to register on the Site or a Wiralex Application includes, but is not limited to, your first and last name, user name, phone number, email address, date of birth, other information collected by Wiralex partners such as Facebook, Instagram and other third party social networking sites from which you will be logging in, and in some cases your Internet Protocol address when combined with other information. We will also collect information you provide about your personal preferences and interests.

The requested information is all necessary and functional to carry out your registration to the Site and to one of the Wiralex Applications.

The legal basis for this processing is the need for Wiralex to comply with your registration request and thus to execute the agreement or perform pre-contractual measures taken at your request (art. 6, paragraph 1, letter b) of the GDPR), and the pursuit of Wiralex's legitimate interest in offering you personalised services related to your specific interests; this interest is balanced by your interest in receiving this type of services (art. 6, paragraph 1, letter f) of the GDPR).

Providing Personal Information is optional, but your refusal will result in your inability to register or to use some or all of the features provided through the Services.

You can register to join Worldz through the Applications or by accessing your account with Facebook, Instagram or certain third party social networking sites ("SNS") through the Site.

During the process of registering via an SNS, you will be presented with a screen from the SNS you wish to sign in with, which is not editable by Wiralex, where you will be asked for your login credentials (which will not be disclosed by the SNS to Wiralex) and asked to agree to share your Personal Information with Wiralex.

If you choose to create your Account by accessing an SNS through the Site, we may extract the Personal Information you have provided to the SNS (such as your "real" name, email address and other information you make publicly available through the SNS) from the account you have with the SNS and use that information to create your Account; the information we extract may depend on the privacy settings you have with the SNS.

The legal basis for this processing is the need for Wiralex to follow up on your wish to create an Account by accessing an SNS and, therefore, to execute the agreement with you or to execute pre-contractual measures taken at your request (Article 6(1)(b) of the GDPR).

In the event that you are an already registered user of Worldz and wish to log in via another Site or the Application you will be recognised as an already registered user and you will not be asked again to agree to share your Personal Information with Wiralex.

We use your Personal Information primarily to provide the Service and process your requests.

We will create your account for use of the Site and Applications based on the Personal Information you provide and you will become a member of Worldz.

We also collect other information you provide when registering with the Site as part of the registration and administration and customisation of your personal profile webpage on Worldz (including, without limitation, your age and individual preferences) ("Non-Identifying Information").

The legal basis for this processing is the pursuit of Wiralex's legitimate interest in offering you personalised services (in this case the personalisation of your personal profile on the Site); this interest is balanced by your interest in receiving these types of services (Art. 6(1)(f) of the GDPR).

Some non-identifying information will be considered part of your Personal Information if it is combined with other identifiers (e.g. combining your postcode with your address) in a way that allows you to be identified. However, the same information will be considered non-identifying when taken alone or combined only with other non-identifying information (e.g., viewing preferences).

We may combine your Personal Information with non-identifying information and aggregate it with information collected from other Worldz users (defined below) to attempt to provide you with a better experience, to improve the quality and value of the Services and to analyze and understand how our Site, Applications and Services are used. We may also use the combined information without aggregating it to serve you specifically, for example, to deliver a product to you based on your preferences or restrictions.

The legal basis for this processing is the pursuit of Wiralex's legitimate interest in offering you personalised services; this interest is balanced against your interest in receiving these types of services (Art 6(l)(f) of the GDPR).

Transfer of Personal Information

Some Personal Information provided by you may be transferred by Wiralex to its business partners, i.e. the companies that own the Site on which you have registered or logged in Worldz. The personal information that may be transferred includes, but is not limited to, your first and last name, telephone number, e-mail address and date of birth.

The legal basis for this processing is the need for Wiralex to comply with your request to perform the agreement or to carry out pre-contractual measures taken at your request (Art. 6, paragraph 1, letter b) of the GDPR), and the pursuit of Wiralex's legitimate interest in offering you the service; this interest is balanced by your interest in receiving this type of service (Art. 6, paragraph 1, letter f) of the GDPR).

Marketing

We use your Personal Information to contact you via our newsletter, marketing or promotional materials and other information that may be of interest to you. If you decide at any time that you no longer wish to receive such communications from us, please follow the unsubscribe instructions provided in any communication or update your "preferences". (See "Changing or deleting information" below).

Recital 47 of the GDPR provides that it may be considered a legitimate interest to process personal data for direct marketing purposes.

It is therefore a legitimate interest of Wiralex to send you marketing communications or newsletters by email, SMS or MMS referring to products or services of Wiralex or third parties (Article 6(l)(f) of the GDPR). This legitimate interest is balanced against your interest in receiving these types of communications.

Log Data

When you visit the Site or Applications, or use our Services, either as a User or as an unregistered user while browsing (one of these, a "Worldz User"), our servers automatically record information that your browser sends whenever you visit a website ("Log Data").

This Log Data may include information such as your Internet protocol address, browser type or the web page you were visiting before accessing our Site and Application, the pages of our Site and Application that you visit, the time spent on those pages, information you search for on our Site, access times and dates, and other statistics.

We may use this information to monitor and analyze the use of our Site, Applications and Service and the technical administration of our Site and Applications, to increase the functionality and ease of use of our Site and Applications and to better tailor our Site and Applications to the needs of our visitors. For example, some of this information is collected so that when you re-visit the Site and Application, it may recognize you and offer advertisements and other information appropriate to your interests. We also use this information to verify that visitors to the Site and Application meet the criteria required to process their requests. We do not treat Registry Data as personal information or use it in combination with other Personal Information, although we may aggregate, analyse and evaluate such information for the same purposes as set out above with respect to other non-identifying information.

The legal basis for any processing described above is the pursuit of Wiralex's legitimate interest in offering you personalised services; this interest is balanced against your interest in receiving such services (Art. 6(I)(f) of the GDPR).

Device information

In addition to Log Data, we may also collect information about the device on which you are using Worldz, including the type of device, the operating system you are using, device settings, unique device identifiers and crash data. The collection of some or all of this information often depends on the type of device you are using and its settings. For more information on what information your device makes available to us, please also check the policies of the device manufacturer or software provider.

The legal basis for this processing is the pursuit of Wiralex's legitimate interest in knowing the information described above (Article 6(I)(f) of the GDPR); this interest is balanced against your interest in allowing Wiralex to properly operate the Site, Applications or Services.

2) Sharing and dissemination of information

Worldz Users

When you register through the Site and Applications and submit Personal Information to create a profile, Worldz users may see your name. If you choose to provide additional Personal Information in your profile, Worldz Users may see such additional Personal Information, including, but not limited to, your photo, location, website, and biography.

Providing additional Personal Information is voluntary and should be related to the degree of interaction you wish to have with Worldz users. However, we recommend that you protect your personal information by not sharing your profile access credentials with third parties.

The legal basis for Wiralex sharing your personal data as described above in the manner just described is found in Wiralex's legitimate interest in offering each Worldz user the opportunity to learn about certain personal data of other users (Art. 6(I)(f) of the GDPR); this

legitimate interest is matched by each user's legitimate interest in interacting with other Worldz users.

Special or judicial data

Wiralex does not process any special or judicial data.

Aggregate and non-identifying information

We may share aggregate information that does not include Personal Information and we may otherwise disclose non-identifying information and log data with third parties for industry analysis, demographic profiling and other purposes. Any aggregate information shared in these contexts will not contain your Personal Information.

Service Provider

We may employ third party companies to facilitate our Service, to provide the Service on our behalf, to perform Site and Application related services (e.g., without limitation, maintenance services, database management, web analytics and enhancement of Site and Application features) to help us analyze how our Site, Applications and services are used, or to perform other services. These third parties have access to your Personal Information only to perform these activities on our behalf and are required not to disclose it to any third party or use it for any other purpose.

Third parties performing the actions just described, if they have access to Personal Information that Wiralex processes as a data controller, have been appointed by Wiralex itself as data controllers within the meaning of Article 28 of the GDPR.

Social Networks

We may share information in your account (including Personal Information) with SNSs that you have linked to your account. These third parties have access to your Personal Information for this purpose only (unless the SNS has received your Personal Information independently of the service) and are obliged not to disclose or use it for any other purpose.

Each SNS acts as an autonomous data controller and is subject to the privacy enforcement of the GDPR independently of Wiralex.

Facebook or Instagram Connect

We allow users to automatically post recent activity on Facebook or Instagram. In addition, you may be able to change your privacy settings for content you post on Facebook.

Communication of personal data

Without prejudice to what is indicated in the preceding points, your data may be communicated

- to all those subjects (including Public Authorities) who have access to personal data by virtue of regulatory or administrative provisions;
- to companies, consultants or professionals in charge of installing, maintaining, updating and, in general, managing the hardware and software of Wiralex or which it uses to provide its services;

- to external companies in charge of sending advertising communications on behalf of Wiralex;
- employees and/or collaborators of Wiralex;
- to all those public and/or private entities, natural and/or legal persons (legal, administrative and fiscal consultancy firms, Judicial Offices, Chambers of Commerce, Chambers and Offices of Labour, etc.), if the communication is necessary or functional to the correct fulfilment of the contractual obligations undertaken, as well as the obligations deriving from the law.

The data concerning you will not be disseminated, except in anonymous and aggregate form, for statistical or research purposes.

The legal basis for processing your data for the purposes just described may from time to time be the need for Wiralex to comply with legal obligations (art. 6, paragraph 1, letter c) of the GDPR) or the obligation on the part of Wiralex to perform the agreement (art. 6, paragraph 1, letter b) of the GDPR).

Business Transfers

Wiralex may sell, transfer or otherwise share some or all of its assets, including Personal Information, in connection with a corporate merger, acquisition or, reorganization.

3) Security

We work to protect the security of your Personal Information. We maintain a variety of physical, electronic, and procedural safeguards when collecting, storing, and disclosing Personal Information. For example, we take steps to protect against unauthorized access to our systems that store Personal Information, such as by using policies that restrict access to those systems to authorized personnel.

When you order products or services through the Site or Applications, we use the above safeguards to transmit information from you to us. For example, we may use Secure Sockets Layer (SSL) protocol or encryption technologies.

You should keep your username, password or other access information secure and confidential to protect against unauthorized access to your account information or computer. You should adopt passwords that others cannot easily understand.

WIRALEX DOES NOT STORE, RETAIN, MANAGE IN ANY WAY, THE PASSWORDS YOU USE TO LOG IN THROUGH YOUR FACEBOOK OR INSTAGRAM ACCOUNT.

You should also be sure to log out of your computer or any shared computer when you have finished using them.

We may make any legally required disclosure of any breach of security, confidentiality or integrity of "personal information" stored in an unencrypted electronic manner (as defined in applicable security breach notification statutes) to you by email or postings on this Site or through the Application as soon as possible and without unreasonable delay, to the extent consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the Site, Application or data system.

The legal basis for processing your personal data for the above purposes is the legitimate interest of Wiralex in ensuring the security of the Site and Applications so as to prevent the unlawful processing of your personal data; this legitimate interest is matched by the legitimate interest of each user in the protection of his or her personal data.

4) International Transfers

For the reasons specified in this Privacy Policy for which we collect your information, for example to provide you with the Site, Applications or Services, your information may be transferred to, and stored on, computers located outside of your state, province, country or other governmental jurisdiction where privacy laws may not be as protective as those in your jurisdiction.

In particular, your data may be transferred to the U.S.A. In relation to this country, the European Commission has not determined that the level of data protection offered is adequate. Therefore, you acknowledge that the transfer of your personal data presents risks due to the lack of an adequacy decision by the European Commission and of adequate safeguards. Therefore, you acknowledge and take note that the transfer may in any case take place pursuant to Article 49 of the GDPR as the transfer of your personal data may be necessary (i) for the performance of the agreement concluded with Wiralex or the performance of pre-contractual measures taken at your request; (ii) for the conclusion or performance of a contract concluded between Wiralex and another natural or legal person for your benefit;

5) Links to other websites

Our Site and Applications may contain links to other websites.

If you choose to visit an advertiser by clicking on a banner ad or other type of ad or by clicking on another third party link, you will be redirected to that third party's website. The fact that we link to a website or display a banner ad or other type of advertisement is not an endorsement, authorization, or representation of our affiliation with such third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer or mobile device, collect data or solicit Personal Information. Other sites follow different rules regarding the use or disclosure of Personal Information that you provide to us. We encourage you to read the privacy policies or statements of the other websites you visit.

Wiralex is not (and cannot be held) responsible for any breach of your Personal Information by the owners of sites or applications that you visit by clicking on a link on the Site or Applications.

6) Our policy regarding children

Our Site, Applications and the Services we provide are not directed to individuals under the age of 14. Therefore, we do not knowingly collect personal data from children under that age. If a parent or guardian becomes aware that a child under the age of 14, who is subject to parental responsibility or guardianship, has provided us with Personal Information without

their consent, please contact us at info@worldz.net. If we become aware that a minor has provided us with Personal Information, we will delete such information from our files.

Similarly, we do not knowingly collect Personal Information from minors of legal age for consent in connection with information society services (subject to applicable law from time to time) in any country in which we operate. Such minors should seek permission from their parents or guardians before disclosing any personal information. If we become aware that a child of legal age in another country has provided Personal Information, we will delete such information from our files.

By continuing to use the Site or Applications and/or providing any Personal Information, you represent and warrant that you are 14 years of age or older or, if you are using the Site or Applications in another country and/or providing information from another country, you represent and warrant that you are of legal age under the laws applicable from time to time.

7) How to contact us

If you have any questions about this policy or any of the practices described herein, please contact us at the following addresses:

Wiralex Srl, Via Crespi, 25, Albino (BG) 24021 Italy

Telephone: (0039) 035- 761172

Email: info@worldz.net.

8) Terms of Service, Notifications, Updates and Privacy Policy

We would also like to inform you that if you decide to visit the Site or use our Applications or Services, your visit and any dispute over privacy is subject to this Privacy Policy and our Terms of Service, including but not limited to limitations on damages and dispute resolution. If you have any privacy concerns regarding the Site, our Applications or our Services, please contact us at the contact information above, giving a full description of the concerns, and we will do our best to resolve them as soon as possible.

Because our business may change from time to time, we may need to make changes to this Privacy Policy or our Terms of Service.

We therefore reserve the right to change this Privacy Policy or our Terms of Service from time to time. We may send periodic email reminders of our changes to our Privacy Policy or Terms of Service, but you should periodically check our Site or Applications, as applicable, to familiarize yourself with our current Privacy Policy or Terms of Service. Any changes we make to our Privacy Policy or Terms of Service will become effective upon posting of the revised version of our Site or Applications, as applicable. Unless otherwise stated, our current Privacy Policy and Terms of Service apply to all information we have about you and your account.

9) Your rights

Pursuant to Article 13 of the GDPR, Wiralex informs you that you have the right to:

- request from Wiralex access to and rectification or erasure of your personal data or restriction of processing concerning you or to object to its processing, as well as the right to data portability;
- withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given before the withdrawal;
- to lodge a complaint with a supervisory authority (e.g. the Data Protection Authority).

The above-mentioned rights may be exercised by making a request to Wirelex at the contacts indicated in Section 7 without formalities.

In particular, Wiralex informs you that the right to portability implies that you have the right to receive in a structured, commonly used and machine-readable format the personal data concerning you provided to Wiralex and that you have the right to transmit such data to another data controller other than Wiralex.

10) Storage period

Wiralex informs you that it will retain your personal data to the extent permitted by law. In particular, your personal data shall be retained for a period of 10 years for the purposes of justice and to comply with legal obligations. The data provided to fulfil the agreement will be kept for 10 years from the date of signing. Data provided on the legal basis of the legitimate interest of Wiralex shall be retained for as long as this interest continues.

11) Consequences of not providing data

The provision of personal data for the purposes described above is always necessary for the pursuit of the aforementioned purposes. Therefore, failure to provide it will make it impossible for Wiralex to perform the agreement signed with you, to comply with legal obligations, to pursue a legitimate interest or to provide the Services.