

# Privacy Policy

Effective from December 2018.

Thank you for choosing Worldz! We have written this Privacy Policy helping you to 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 in Via Crespi, 25 Albino (BG), registered in Italy with VAT number n. 04108630163; Telephone 0039 035 761172; Email: info@worldz.net, which acts as Data Controller ("Wiralex").

This document applies to any type of personal data processing carried out by Wiralex through the website www.worldz.it (the "Site") or any type of applications owned by Wiralex, such as the Worldz Service (the "Applications" ).

This information 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) Identifiable personal information that we collect and the purposes for which we use it**

When you register with us through the Site or one of the Wiralex Property Applications (such as Worldz) to become a member of Worldz, or when you use one of Wiralex's Services or Applications, we may ask you for personal data (hereinafter referred to as identifiable personal information). This refers to information about you that can be used to contact or identify yourself ("Personal Information").

The legal basis of this processing may consist from time to time (i) in the need by Wiralex to execute the contract with you or to perform pre-contractual measures taken on your request (Article 6, paragraph 1, letter b) of the GDPR ); (ii) in the need to comply with a legal obligation imposed on Wiralex (Article 6, paragraph 1, letter c) of the GDPR); (iii) in pursuit of a legitimate interest of Wiralex, provided that your interests or rights and fundamental freedoms do not prevail (article 6, paragraph 1, letter f) of the GDPR).

In the continuation of this information the legal basis of each treatment will be specified. The personal information requested when registering for the Site or a Wiralex Application includes, but is not limited to, the name and surname, user name, telephone number, e-mail address, information collected by the SNS from which you will make the access. and, in some cases, the address of your Internet Protocol when combined with other information. The legal basis of this processing is the necessity of Wiralex to follow up your registration request and then to execute the contract with you or to take pre-contractual measures to adopt at your request (Article 6, paragraph 1, letter b) of the GDPR).

We may also collect information that you provide about your personal preferences and

interests. The legal basis of this treatment is the pursuit of the legitimate interest of Wiralex in offering you personalized services related to your specific interests; this interest is balanced by your interest in receiving this type of services (Article 6, paragraph 1, letter f) of the GDPR). You may choose not to provide us with any or all of the information we specify or request, but in this case you may not be able to register with us or take advantage of some or all of the features provided through the Services.

You can register to join Worldz through the site or applications or by accessing your account with Facebook or certain third-party social network sites ("SNS") (including Facebook and Instagram) through our site.

If you decide 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, the email address and other information you make publicly available via the SNS) from the account you have with the SNS and use this information to create your account; the information we extract may depend on the privacy settings you have with the SNS.

The legal basis of this processing is Wiralex's need to follow up on your willingness to create an Account by accessing an SNS and, therefore, to execute the contract with you or to perform pre-contractual measures taken on your request (Article 6 , paragraph 1, letter b) of the GDPR).

We use your personal information primarily to provide the Service and manage your requests.

We will create your account for your use of the Site and Applications based on your personal information and become a member of Worldz.

We also collect the other information you provide when registering with the Site as part of the registration and the administration and personalization of the web page of your personal profile on Worldz (purely by way of example, without limitation, age and individual preferences) ("Non-identifying information").

The legal basis of this treatment is the pursuit of the legitimate interest of Wiralex in offering you personalized services (in this case the personalization of your personal profile on the Website); this interest is balanced by your interest in receiving this type of services (Article 6, paragraph 1, letter f) of the GDPR).

We also collect other informations you provide as part of the registration and the administration and personalization of your profile web page on Worldz (for example, without limitation, age and individual preferences) ("Non-identifying information").

Some non-identifying information will be considered part of the user's personal information when combined with other identifiers (for example, by combining the postal code with your address) in order to identify it. However, the same information is considered non-identifying when it is taken alone or combined only with other non-identifying information (for example, 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 try to provide you with a better experience, to improve the quality and value of services and to analyze and

understand how the Our site, applications and services are used. We may also use the combined information without aggregating it to serve you in particular, for example to deliver a product based on your preferences or restrictions.

The legal basis of this treatment is the pursuit of the legitimate interest of Wiralex in offering you personalized services; this interest is balanced by your interest in receiving this type of services (Article 6, paragraph 1, letter f) of the GDPR).

### **Marketing for you.**

We use your personal information to contact you with Worldz's newsletter, marketing or promotional material 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 "Editing or deleting information" below).

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

Consequently, Wiralex has a legitimate interest in sending marketing communications or newsletters for emails, text messages or MMSs referring to Wiralex products or services or third parties (article 6, paragraph 1, letter f) of the GDPR). This legitimate interest is balanced by your interest in receiving this type of communication.

### **Log Data.**

When you visit the Site or the 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 the information that your browser sends each once you visit a website ("Registration Data").

This log data may include information such as the Internet protocol address, the type of browser or Web page you were visiting before accessing our site and application, to the pages of our site and the application visited, to the time spent on these pages, information you seek on our site and application, access times and dates and other statistics. We may use this information to monitor and analyze the use of the Site, of the Applications and of the Service and of the technical administration of the Site and of the Applications, to increase the functionality and ease of use of the Site and of the Applications and to better adapt our Site and Applications to the needs of our visitors. For example, some of this information is collected in such a way that when you visit the Site and the Application again, it may recognize you and offer advertisements and other information appropriate to your interests.

We also use this information to verify that site and application visitors meet the criteria required to process their requests. We do not treat the Registration Data as personal data or use it in association with other personal information, although we may aggregate, analyze and evaluate such information for the same purposes as indicated above for other non-identifying information. The legal basis of each treatment described above is the pursuit of the legitimate interest of Wiralex in offering you personalized services; this

interest is balanced by your interest in receiving this type of services (Article 6, paragraph I, letter f) of the GDPR).

### **Device information.**

In addition to log data, we may also collect information about the device you are using with 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 about the information your device has at our disposal, also check the device manufacturer's or software vendor's policies.

The legal basis of this processing is the pursuit of the legitimate interest of Wiralex to know the information described above (Article 6, paragraph I, letter f) of the GDPR); this interest is balanced by your interest in allowing Wiralex to properly manage the Site, Applications or Services.

## **2) Sharing and dissemination of information**

### **Worldz Users.**

When you register through the Site and Applications and send personal information to create a profile, Worldz users can see your name. If you choose to provide additional personal information in your profile, Worldz users may view such additional personal information, including, but not limited to, photos, location, website and biography. Providing additional personal information is voluntary and should be related to the degree of interaction you want to have with Worldz users. We advise you in any case to protect your personal data without sharing the credentials of access to your profile to third parties.

The legal basis of Wiralex's sharing of your personal data described above in the manner described above can be found in the legitimate interest of Wiralex to offer each Worldz user the possibility to know some personal data of other users (Article 6, paragraph I, letter f) of the GDPR); this legitimate interest corresponds to the legitimate interest of every user to interact with other Worldz users.

### **Your sensitive informations**

### **Aggregated information 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 profiles and other purposes. Any aggregate information shared in these contexts will not contain your personal information.

### **Service Provider**

We may employ third-party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Site and Application-related services (for example, without limitation, maintenance services, database management, web analysis and site improvement and Applications 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 obliged not to disclose or use them for other purposes. The third parties who perform the actions described above, if they have access to personal data that Wiralex deals with as data controller, have been appointed by Wiralex itself as data controllers pursuant to art. 28 of the GDPR.

### **Social Network.**

We may share informations in your account (including personal information) with the SNS you have linked to your account. These third parties have access to your personal information only for this purpose (unless the SNS has received your personal information independently of the service) and are obliged not to disclose it or use it for other purposes. Each SNS acts as an independent data controller and is subject to the application of the GDPR privacy policy independently of Wiralex.

### **Facebook o Instagram Connect.**

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

### **Compliance and law enforcement.**

Wiralex Srl can cooperate with government and police officials and private parties to enforce and respect the law. We may disclose any information relating to you to government or law enforcement officials or private parties as we deem it necessary or appropriate to respond to legal requests and processes (including, but not limited to, quotations) to protect the property and rights of Wiralex srl or a third party, to protect the security of the public or any person, or to prevent or stop activities that we may consider, or to represent a risk of illegal, immoral or legally prosecutable activity.

The legal basis of the processing of your data for the purposes described above is the need by Wiralex to comply with legal obligations (Article 6, paragraph 1, letter c) of the GDPR).

### **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 under regulatory or administrative provisions;
- to companies, consultants or professionals in charge of installation, maintenance, updating and, in general, the management of Wiralex's hardware and software or for which it uses its services;
- to external companies responsible for sending advertising messages on behalf of Wiralex;
- to Wiralex employees and / or collaborators;
- to all those public and / or private entities, natural and / or legal persons (legal, administrative and fiscal consultancy, Judicial Offices, Chambers of Commerce, Chambers and Labor Offices, etc.), if communication is necessary or functional to the correct fulfillment of the contractual obligations assumed, as well as the obligations deriving from the law.

The data concerning it will not be disseminated, if not in an anonymous and aggregate form, for statistical or research purposes. The legal basis of the processing of your data for the purposes described above may be from time to time Wiralex's need to comply with legal obligations (Article 6, paragraph 1, letter c) of the GDPR) or the obligation on the part of Wiralex to execute the contract signed with you (Article 6, paragraph 1, letter b) of the GDPR).

### **Business transfers**

Wiralex Srl may sell, transfer or otherwise share some or all of its resources, including personal information, in connection with a merger, acquisition or corporate reorganization. or sale of goods or in the event of bankruptcy.

### **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 measures to protect against unauthorized access to our systems that store personal information, for example by using policies that restrict access to such systems to authorized personnel.

When ordering products or services through the Site or the Applications, we use the aforementioned guarantees for the transmission of information from you to us. For example, we could use the Secure Sockets Layer (SSL) protocol or cryptographic technologies.

You must keep your username, password (s), or other secure and confidential access information to protect against unauthorized access to your account information or computer. You should adopt passwords that others can not easily understand. You should also be sure to disconnect from your computer or any shared computer when you are finished using them.

We may make any disclosure legally required of any breach of security, confidentiality or integrity of unencrypted electronically stored "personal data" (as defined in applicable statutes on security breach notification) to you via e-mail or post on this site or via the Application as soon as possible and without unreasonable delays, to the extent that they are consistent with (i) the legitimate needs of law enforcement or (ii) any measure necessary to determine the scope of the violation and restore the reasonable integrity of the Site, Applications or data system.

The legal basis of the processing of your personal data for the aforementioned purposes is the legitimate interest of Wiralex to ensure the security of the Site and Applications in order to prevent the unlawful processing of personal data of users; this legitimate interest corresponds to the legitimate interest of every user in the protection of his personal data

#### 4) International transfer

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 and stored on computers located outside your state, province, country or another government 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. Data transfer in the U.S. takes place on the basis of Commission Implementing Decision (EU) 2016/2295 of 12 July 2016 (pursuant to Directive 95/46 / EC of the European Parliament and of the Council, on the adequacy of the protection offered by the EU-US shield regime " [notified under number C (2016) 4176] and of the consequent "Authorization to transfer data abroad through the agreement called" EU - USA Privacy-Shield "issued by the Guarantor for the Protection of Personal Data on 27.10.2016 , being all recipients of data located in the USA registered in the Privacy Shield, in addition, in some cases, in contracts with such recipients are also included the standard contractual clauses as per the "Commission Decision of 5 February 2010 on contractual clauses type for the transfer of personal data to controllers established in third countries pursuant to Directive 95/46 / EC of the European Parliament and of the Council "(notified under C (2010) / 87 / EU] and therefore on the basis of the consequent "Authorization for transfers to third countries through the standard contractual clauses set out in Commission Decision 2010/87 / EU in case of importer established in a third country" issued by Guarantor for the Protection of Personal Data with measures of May 27, 2010 and November 15, 2012.

#### 5) Links on other sites

Our site and our applications may contain links to other websites. If you choose to visit an advertiser by clicking on an ad banner or other type of ad or by clicking on another third party link, you will be redirected to the third party website. The fact that we link to a

website or present an advertising banner or other type of advertising is not an endorsement, authorization or representation of our affiliation with such third party, nor is it an endorsement of their privacy or privacy policies or practices. information security. We do not control third-party websites. These other websites may place their own cookies or other files on their computer or mobile device, collect data or request personal information. Other sites follow different rules regarding the use or disclosure of personal information provided to us. We encourage you to read the privacy policies or statements of other websites you visit.

Wiralex is not (and can not be held responsible) for any violation of your personal data by the owners of the sites or applications you have visited by clicking on a link on the Site or the Applications.

## **6) Our Policy for children**

Our site, applications and services we provide are not aimed at individuals under the age of 18. children under the age of 13. Therefore, we do not knowingly collect personal data from minors.. If a parent or guardian realizes that a minor subjected to his parental responsibility or protection, your child has provided us with personal information without their consent, please contact us at [info@worldz.net](mailto:info@worldz.net). If we learn that a child under 13 has provided us with Personal Information, we will delete this information from our files. Likewise, we do not seek to collect personal information from minors of legal age in any country where information is collected, nor the Site, Applications or Services addressed to such children in another country. Minors should seek permission from their parents or guardians before disclosing any personal information. If we learn that a minor of legal age in another country has provided personal information, we will delete this information from our files. By continuing to use the Site or the Applications and / or providing any personal information to us, you represent and warrant that you are of legal age, not less than 13 years of age, or if you use the Site or Applications of another country and / or to provide information to us from another country, are not under the legal age in that country according to Italian legislation or according to their own legislation.

## **7) How contact us**

If you have any questions about this policy or any of the practices here, please contact us in Via Crespi, 25, Albino (BG) 24021 Italy Tel: (0039) 035-761172, or send us an e-mail to [info@worldz.net](mailto:info@worldz.net).

## **8) Terms of Service, Notifications, Update and Privacy Policy**

We would also like to inform you that if you decide to visit the Site or use our Apps or Services, your visit and any privacy dispute is subject to this Privacy Policy and our Terms of Service, including but not limited to , limitations on damages and settlement of disputes. As noted above in this Privacy Policy on how to contact us, if you have any concerns



regarding the privacy in relation to the Site, our Applications or our Services, we invite you to contact us with a complete description of the problems, and we will do our best to solve any problems as soon as possible.

Since our business may change from time to time, you may need to make changes to this Privacy Statement 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 periodically send reminders of our changes to our Privacy Policy or Terms of Service, but you should periodically check our Site or Applications, as appropriate, to familiarize yourself with our current Privacy Policy or Terms of Service. Any changes to our Privacy Policy or Terms of Service will become effective upon publication of the revised version (s) of our Site or Applications, as appropriate. 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 art. 13 of the GDPR, we inform you that you have the right to:

- ask Wiralex for access to personal data and the correction or deletion of the same or the limitation of processing that concern you or to oppose their treatment, in addition to the right to data portability;
- revoke the consent at any time without prejudice to the lawfulness of the treatment based on the consent given prior to the revocation;
- propose a complaint to a supervisory authority (eg: the Guarantor for the protection of personal data).

The above rights may be exercised by request without formalities to Wirelex to the contacts indicated in art. 9. In particular, Wiralex informs you that the right to portability implies that you have the right to receive the personal data concerning you provided to Wiralex in a structured, commonly used and readable form by automatic device and that you have the right to transmit such data to a another data controller other than Wiralex.

## **10) Retention period**

Wiralex informs you that it will keep your personal data to the extent permitted by law. In particular, your personal data will be kept for a period of 10 years for justice needs and to fulfill legal obligations. The data provided to fulfill the contract signed with you will be kept for 10 years from the date of subscription. The data provided and that have the legitimate interest of Wiralex as their legal basis will be retained until this interest continues.

## **11) Consequences of failed conferment**

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 result in Wiralex from time to time inability to execute the contract signed with you, to comply with legal obligations or to pursue a legitimate interest.