

# Disclosure on personal data processing, pursuant to Articles 13 of the UE Regulation 2016/679 (“GDPR”)

This Policy explains which of your personal data are collected by DocDonkey (hereinafter “we” or “DocDonkey”), for which purposes and how they are processed. You can also find below the necessary information to enforce your rights provided for by GDPR.

Generally, we collect your personal data when you create an account, when you use our services, when you email or call us or send us a message, or when you use our websites. We inform you that the personal data collected during such activities will be processed in order to reply to your inquiries, to allow you to use the products and services provided by DocDonkey, to carry out marketing activities, to provide customer support and to carry out analyses in order to ensure the safety of our products and services, as specified below.

## **1. Who processes your data – Data Controller**

DocDonkey is a registered trademark of Revfin srl, licensed to Alientech S.r.l. a socio unico, with registered office in Trino (VC), via dei Cordari 1 – 13039 –Italy, which acts as the Data Controller of the processing of your personal data.

## **2. Which data we use – type of processed data**

For the purposes of creating your DocDonkey account, managing your orders, supplying of our services, as well as providing assistance, we process your personal data that identify you.

To allow you a better experience with DocDonkey services, we process information relating to your IP address.

In order to properly manage our platform, we process the data generated through your actions, for example when you add an item to the cart or the wish list, and those generated during a transaction, such as the amount of the transaction, hour and place of the transaction and payment methods.

In order to send you commercial information about our products and services, we may use your email address and your name, provided you have previously authorized such processing.

## **3. Where we collect your data – Data collection methods**

**Directly from you.** For example, when you create an account, buy one of our products or services, or send us a request via email or through other communication means. If you do not communicate your data, we cannot activate your account, nor process your order or provide you a service.

**Through the use of the website.** We use cookies and other analysis tools, to improve the functionalities of the websites and our tools and make their use more efficient. To learn more, please see our Cookie Policy: <https://www.iubenda.com/privacy-policy/85107426/cookie-policy>

#### **4. Why we process your data – Purpose and legal basis of processing**

**To provide you with DocDonkey services through our platform, give you information about the activation of your account and about DocDonkey services, and provide assistance.** The processing of your data is necessary to give you access to the platform and its functionalities, respond to your requests and provide assistance.

During your use of the platform, we may collect information about your IP address. Failure to provide such information may entail the impossibility to access or use our services.

The legal basis for this processing is the completion of our services.

**To fulfil your order.** The processing of your data is necessary in order to enjoy the courses you have enrolled in. The legal basis for this processing is the execution of the sales contract.

**To send you communications about your purchase order.** We may send you emails regarding your account or your purchase of DocDonkey courses. The legal basis for this processing is the execution of the sales contract.

**To properly manage your administrative position.** We process your data for accounting, administrative and tax purposes, directly related to the business of DocDonkey as required by the applicable accounting, tax and law provisions. The legal basis for this processing is the compliance with legal obligations.

**To send essential information concerning your account and your use of DocDonkey products and services.** We use your email to send you important information about the status of your account, the security of DocDonkey and services or changes to this privacy notice. The legal basis for this processing is DocDonkey legitimate interest to inform you about your account and services you have enabled.

**To let you interact with customer support operators.** We may use your e-mail address or telephone number, as well as your name, to assist you in case you need help. The legal basis for this processing is the execution of the agreement that you concluded with DocDonkey when you accepted the terms and conditions of use of DocDonkey services.

**To prevent or assess unlawful conduct, to protect and enforce our rights.** For example, we may use your data to prevent or prosecute illicit acts and infringements of our or third party intellectual / industrial property rights, or to prevent or prosecute cybercrimes or crimes committed through computer networks. The legal basis for such processing is the legitimate interest of DocDonkey to protect our rights and prevent criminal offences.

**To receive newsletters from DocDonkey.** After obtaining your consent, you may receive from DocDonkey e-mail communications with promotional and / or informative content about our products and services. The legal basis for this processing is your consent. You can revoke your consent at any time by clicking “Unsubscribe” in the e-mail you received or by sending a request to [info@docdonkey.com](mailto:info@docdonkey.com).

**To obtain information on the use of the website.** When you browse our platform, even when you do so without being registered or having logged in, the software procedures and the computer system controlling the functioning of the web applications acquire, during their normal operation, some data whose transmission is implicit in the use of Internet communication protocols.

**To carry out analytics statistics on the use of the website.** Analytical tools are used to detect user behavior on our platform, to improve the user experience and monitor the pages you visit, access time, frequency and duration of visits, links you click on and other actions that you make when using our services.

The legal reason for processing this analytical information is DocDonkey's legitimate interest in understanding how customers interact with our website, so we can enhance the user experience and functionality of our website.

This technical data may also be used to process information, including statistical and profiling information, necessary to improve or correct our services and our marketing activities, in order to improve the quality and functionality of our platform or to provide new services or technologies. The legal basis for this processing is DocDonkey's legitimate interest to improve the quality and safety of our products and services provided to users.

## **5. Cookies and similar technologies**

**What are cookies.** Cookies are small text files that the websites visited by users send to their terminals, where they are stored before being re-transmitted to the same websites during successive visits.

**Cookies used by DocDonkey's platform and their purposes.** The first time you will visit the platform, you will be asked to accept cookies through a banner.

You can change, even later, the settings of your browser so as to know when you receive cookies or disable the automatic acceptance of cookies function.

The website uses the following cookies categories:

- Technical cookies (or browsing cookies), which contribute to the functioning of the website, for example to allow browsing through the pages and access the reserved area of the website; the legal basis for the processing underlying the use of these cookies is the legitimate interest of DocDonkey in providing efficient and well-functioning services to its customers.
- Functional cookies, which allow activating specific functionalities of the website and store your preferences (such as the language), in order to improve your browsing experience; the legal basis for the processing underlying the use of these cookies is the legitimate interest of DocDonkey in providing efficient and well-functioning services to its customers.
- Analytical cookies, which allow the acquisition of statistical information in aggregate and anonymous form, in relation to the navigation modalities; the legal basis for the processing

underlying these cookies is the legitimate interest of DocDonkey in providing efficient and well-functioning services to its customers.

- Profiling cookies, which allow the creation of personalized user profiles for advertising purposes and are then used to undertake marketing activities; the legal basis of the processing underlying the use of these cookies is your consent. You can withdraw your consent at any time by changing your browser settings.

To learn more, please read our Cookie Policy: <https://www.iubenda.com/privacy-policy/85107426/cookie-policy>

## **6. Processing methods**

In accordance with the purposes indicated above, your personal data may be processed as follows:

- Entrusting processing operations to third parties;
- Processed by using electronic means;
- Manual processing by means of paper archives.

Each treatment is carried out in compliance with the procedures referred to in articles 6 and 32 of the GDPR, through the adoption of the appropriate security measures provided as to ensure the security and confidentiality of the data.

## **7. With whom we share your data**

**With our employees.** Your data will be shared exclusively with competent and duly appointed and trained subjects for carrying out the services necessary for the correct management of your relationship, with a guarantee of protection of your rights.

**With service suppliers.** Your data may be disclosed to third parties, for one or more of the purposes described above, in particular to: public and / or private entities for which data communication is mandatory or necessary in fulfillment of legal obligations or functional to the administration of the relationship, consultants and independent contractors - even in associated form - banks, credit institutions and payment service providers.

**With service providers.** DocDonkey uses third-party services (cloud, analysis, messaging, website browsing functionalities) that operate as data processors pursuant to agreements in compliance with art. 28 GDPR and in accordance with the provisions relating to the transfer of data to third countries, where such data are actually transferred. These subjects acquire only the personal data necessary to fulfil their functions and may use them only for the purpose of performing these services on our behalf or to comply with the law.

**With judicial or administrative authorities.** Where we believe we have to do so to comply with an order from the judge or an authority, or to comply with legal obligations or in order to protect us or third parties judicially, we may disclose your data to the Judicial Authority or to a Governmental Agency in Italy or the European Union.

## **8. Disclosure of your data**

Your personal data will not be disclosed in any other way.

## **9. Data retention period**

We inform you that, in compliance with the principles of lawfulness, limitation of purposes and minimization of data, pursuant to art. 5 of the GDPR, the retention period of your personal data is:

- Established for a period of time not exceeding the achievement of the purposes for which your data are collected and processed and in compliance with mandatory deadlines;
- Prescribed by law.

## **10. Your rights**

Pursuant to Articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR, in addition to managing your preferences on the processing of your personal data in accordance with the previous paragraphs, you can contact DocDonkey to:

- Obtain confirmation of the existence or nonexistence of your personal data, even if not yet recorded, and their communication in an intelligible form;
- Request access to your personal data, updating, rectification or integration of your personal data;
- Request erasure, transformation into anonymous form and limitation of the processing of your data;
- Object, for legitimate reasons, to the processing of your personal data, even if pertinent to the purpose for which they were collected;
- Ask for the portability or copy of your data;
- Revoke consent, at any time, to the processing of your data for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication (this will not affect the lawfulness of the treatment based on the consent given before of the revocation);
- Ask for the identification details of the data controller, the managers and the designated representative, as well as information about the subjects or categories of subjects authorized to process your data, the external data processors and those in charge.

When you exercise the right of access, you also have the right to know:

- If the processing of your data is underway;
- What are the purpose and the methods of processing;
- What are the categories of processed data;
- The retention period of your data (or the criteria for determining the retention period);
- If an automated processing is underway (e.g. by profiling) and what is the logic of such processing;
- The origin of the data (if not collected initially by us).

You have the right to lodge a complaint with the Authority for the Protection of Personal. To this end, you can find the appropriate form on the website [www.garanteprivacy.it](http://www.garanteprivacy.it).

## ***11. How to exercise your rights***

You can exercise your rights at any time by sending a registered letter with return receipt to the following address:

ALIENTECH S.R.L. a socio unico  
Via dei Cordari, 1  
13039 Trino (VC)  
Italy