

# Privacy Policy

The methods by which the personal data of users who access the site [www.friiis.com](http://www.friiis.com) and/or use the Friiis App (collectively, the “**Site**”) and, following registration, benefit from the services provided by Friiis S.r.l. through the Site, are described below. Friiis is committed to provide users of the Site with services that comply with the protection of their personal data, to allow each user control over their privacy when using the Service, utilising the functions within their profile.

This privacy policy, drawn up in line with article 13 of the General Personal Data Protection Regulation no. 679/2016 (hereafter “**GDPR**”), relates exclusively to the processing of personal data processed directly through the Site; any third-party internet sites that the user may consult via links available on the Site will remain subject to the privacy policy applied by the manager of the relevant third-party site. Users are invited to view these documents before browsing third-party sites.

## 1. Data controller

The data controller is the company Friiis S.r.l., with its registered office at Via S. Tecla 5, 20122 Milan, registered capital of €10,000 – fully paid up, VAT no. 09177260966, REA [Economic and Administrative Index] no. 2074087 (“**Company**”), Tel. +393474360313, e-mail: [info@friiis.com](mailto:info@friiis.com).

## 2. Type of data

### *Visitors’ data*

No provision of personal data by the user is required to consult the public pages on the Site. However, any contact with the Company, the voluntary, express and spontaneous sending of messages, via electronic or traditional mail, to the Company’s addresses indicated on the Site will lead to the subsequent acquisition of the sender’s addresses, including e-mail, or the relevant telephone numbers, required to respond to requests, as well as any other personal data included within the relevant communications. This data will only be used in order to follow up a user’s request, and may only be communicated to third parties if required for this purpose. The data will only be stored for the time that is strictly necessary to provide the user with the service requested, and will not be disseminated.

### *Data provided during registration, and during the service usage phase*

In order to benefit from the services available on the Site (e.g. storage of memory capsules), the user is required to register with the Site (“**User**”). Data processing will consist of all operations (such as, purely by way of example: collection, registration, consultation, organisation, storage, processing, communication, modification, selection, usage) relating mainly to data provided by the user during the registration phase, and/or upon benefiting from the services. The Company will process the following in detail:

- a) **the User’s identification and contact data**, acquired during the registration phase and management of the User’s account, including data that is essential for registration and the fulfilment of legal obligations (for example, forename, surname, address, date and place of birth, tax code, gender, telephone number, e-mail, username, password).

- b) If the User decides to log in using social media applications (for example, Facebook, Twitter), **some data made public by the User on his/her social media network profile** (for example, forename, surname, gender, town and e-mail address, corresponding to what is requested for registration with the Site without linking to a social media profile). Use of this means of access will not involve any communication by the Company of data on any social media networks;
- c) **data required to make use of services** (for example, recipients for sharing or full delivery of capsules). This data will be processed solely for the purposes of making the service available to the User;
- d) any **data relating to third parties (parties involved)** with whom the User has requested the sharing of capsules (for example, e-mail address, acceptance or rejection of the sharing or transfer of a capsule). This data, which may only be included if the interested party to whom it refers has been informed about it by the User and has consented to its inclusion, will not be subject to any active processing by the Company, will only be stored for the time that relates strictly to the services for which the User is including the data. It is understood that, in the case of the infringement of the rights of third parties, the Company may remove the content in question at any time, within the situations and limits provided for by law.

### 3. Purpose of processing and legal bases for processing

Personal data will be collected and processed for the purposes and on the legal bases as per article 6 of the GDPR, set out below:

- (1) to **provide the goods and services** requested by the User (for example, management of registration and Site access processes, management of the User's account, management of payments, storage of capsules and management of Reminders, assistance for users, management of any complaints or claims, and sharing of content in line with the User's instructions). The provision of data for these activities is essential for the correct establishment and management of the User's requests, and does not require his/her consent. The legal basis for data processing may be identified within implementation of the contract and related pre-contractual measures (Article 6, sub-section 1, letter b, of the GDPR);
- (2) for the fulfilment of any **legal and/or regulatory obligations** (for example, invoicing). The provision of personal data is mandatory, and processing does not require the consent of the interested party. The legal basis may be identified within fulfilment of the obligations deriving from the legislation in place (Article 6, sub-section 1, letter c, of the GDPR);
- (3) to compile **internal statistical analyses**, for the purposes of improving the quality of services. The provision of personal data is voluntary, and the legal basis for its processing is the pursuit of the Company's legitimate interests (Article 6, sub-section 1, letter f). The User may object to this processing by exercising the rights set out within point 9.
- (4) for the **protection of our rights**, both legal and non-judicial. The provision of data for this purpose is mandatory, and the legal basis for its processing is the pursuit of the Company's legitimate interests in exercising its rights (Article 6, sub-section 1, letter f, of the GDPR);
- (5) for the sending of via e-mail of **commercial communications** relating to similar products and services to those that are the subject of a purchase by the user. The legal basis consists of the Company's legitimate interests, in compliance with Recital 47 of the GDPR and article 130, sub-section 4, of Legislative Decree no. 196/2003 (Personal Data Protection Code). The provision of data for this activity is instrumental in the sending of e-mails of a promotional nature, and the User may object to this processing at any time.

- (6) With the User's consent, for **marketing purposes**, by means of the sending, via e-mail, SMS, social media networks, push notifications, newsletters, **communications relating to Friiis services**, and **market surveys** relating to its services. Transfer of the data required for this purpose is entirely voluntary. The User is free to refuse to provide data and consent for processing for these purposes, without this compromising in any way the User's ability to benefit from services in full.

## 4. Processing methods – Security

The User's personal data, or that of a recipient third party – whose data has been provided by the User – will be processed by the Company using electronic and manual systems, in line with the principles of fairness, honesty and transparency laid down by the applicable legislation with regard to the protection of personal data and protecting the privacy of interested parties, by means of technical and organisational security measures to ensure an adequate level of security.

Personal data is transmitted in encrypted form, using the "SSL" (Secure Sockets Layer) standard, which creates a secure connection between a client and a server, encoding data sent through the web page. With SSL, the exchange of data between our server and the User's browser will be automatically encrypted. Use of the SSL protocol is shown within the site URL, which starts with **https://** rather than **http://**. An icon in the shape of a padlock will be seen on the browser bar, or at the bottom of the page.

## 5. Data storage

The data required for achieving the purposes set out in this information document will be stored by the Company for the time necessary to achieve the purposes for which it was collected (in line with the duration of the capsules chosen by the User). The personal data required for managing tax and accounting profiles will be stored for a time period of not more than ten years after the ending of the commercial relationship, in fulfilment of the civil and fiscal obligations laid down by the legislation in place. For purposes linked to marketing, the Company will store data for as long as the User's consent remains in place, unless a different timeframe is laid down by law or subsequent decisions of the Data Protection Supervisor.

## 6. Navigation data – Cookies and Social Media functionality

### *Navigation data*

The IT systems and programs used for the functioning of the Site collect some personal data, the transmission of which is implicit in the use of Internet communication protocols (e.g. IP addresses or domain names for user's computers connected to the Site, URI – Uniform Resource Identifier addresses for resources requested, request scheduling, method used for submitting requests to the server, size of files obtained in response, numerical code relating to the status of the response provided by the server – success, error, etc. – and other parameters relating to the User's operating system and IT environment). Even in the case of information that is not collected in order to be associated with identified interested parties, it may, by its nature, through processing and connection with data held by third parties, enable users to be identified.

This data is used solely for the purposes of obtaining statistical information on the use of the Site that is not associated with any User identification data, to check its correct functioning, and is deleted immediately after processing. The data may be used for the assessment of

liability in the case of hypothetical cyber crime adversely affecting the Site: apart from this eventuality, data on web contacts will not remain in this form for more than [xx] days.

#### *Cookies and Social Media Functionality*

Our Site collects and uses technical and profiling cookies, including those from third parties. For more information, or to deactivate all or some of the cookies used, click here [\[link to the Cookie Policy\]](#).

## 7. Communication and dissemination of data

For the proper achievement of the aforementioned purposes, Company personnel employed to manage and maintain Site functions, provide assistance to Users, and for administration, as well as personnel from third party companies that provide services to the Company (for example, providers of IT hosting and Site maintenance services), including in the capacity of data processors, may have access to data collected.

It is understood that, if the User decides to share one or more capsules, the Company will contact the recipients specifically identified by the User for each capsule selected in this way, and will make the relevant capsule available on the basis of the choices made by the User, unless the capsule is destroyed.

In no case will data collected be passed on to third parties to be used for their own purposes; it is understood that, in the case of any extraordinary corporate operations (e.g. sale or leasing of the company), the data may be transferred or passed on to third parties involved in the purchase/leasing, or that are otherwise beneficiaries.

## 8. Transfer of data abroad

The Company makes use of external suppliers for the storage of capsules, specifically Amazon Web Services Inc., 410 Terry Ave North, Seattle, WA 98109-5210, US, which provides a server hosting service, with a specific requirement for storage at its data centre in Ireland, and transfer outside the European Union being prohibited.

## 9. Rights of interested parties

An interested party may exercise, with regard to the processing of data described herein, the rights provided for by the GDPR (articles 15-21), including:

- receiving confirmation of the existence of data and accessing its content (right of access);
- updating, amending and/or correcting data (right to rectification);
- requesting the cancellation or limitation of the processing of data processed in violation of the law, including data that does not need to be stored in connection with the purposes for which the data was collected or otherwise processed (right to be forgotten right to restriction of processing);
- objecting to processing (right to object);
- receiving a copy in electronic format of the data that relates to him/her as an interested party, where this data was provided within the context of the contract, and requesting that the data be sent to another data controller (right to data portability).

In order to exercise these rights, the interested party may contact the Company by writing to the contact details indicated in point 1 above, it being understood that any requests for suspension and/or cancellation of an account can also be managed through the account's configuration page. When contacting us, the interested party will need to ensure that he/she includes his/her name, e-mail/postal address and/or telephone numbers, to make sure that his/her request can be handled correctly. The User may object to the sending of commercial communications, as referred to in point 3.5, at both the point of registration and subsequently, by using the appropriate link contained within the footer of the relevant e-mail.

Users' capsules will be cancelled (i) at the point of their destruction by the User, if this occurs before their expiry, (ii) following their expiry, after 30 days from the date of the e-mail providing instructions on accessing Memories, and (iii) in the case of cancellation of an account.

If the interested party believes that there has been an infringement of legislation relating to the protection of personal data, he/she may submit a complaint to the supervisory authority of the member state within which he/she usually resides or works, or of the place where the suspected violation took place. A list of European supervisory authorities can be found here: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

Information document updated on [•].

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