

## Privacy Policy on the processing of personal data pursuant to Article 13 of EU Regulation 679/2016

**JVP S.r.l.**, registered office Viale dell'Industria 16/20, Piove di Sacco (Padua) – Post code 35028 (Padua) VAT Reg. no./tax number 02405330289, in its capacity as Data Controller (hereinafter “**Controller**”) pursuant to EU Regulation 679/2016 (hereinafter: “**Regulation** or “**GDPR**”) – considers *privacy* and the protection of personal data one of the main objectives of its activity.

Before communicating any personal information to the Controller, we ask all the Users of the JVP S.r.l. website to carefully read this Privacy Policy which contains important information on the protection of their personal information.

This Privacy Policy describes how the official website of JVP S.r.l. (<https://www.jvph.eu>) and the website <https://charmfloor.com> linked to JVP S.r.l. (and hereinafter: “**Site**”) are managed and not other external websites which can be consulted by the user through links.

Additional information can be provided in the different channels of access, divided according to the subjects dealt with (Thematic Areas).

This Privacy Policy:

- is an integral part of the Website;
- is made pursuant to article 13 of the Regulation to those who interact with the web services of the website;
- in some sections of the site, where necessary, it is completed by detailed provisions in relation to the specific processing of personal information.

The processing of personal information will be based on the principles of correctness, lawfulness, transparency, limitation of purposes and storage, minimization and accuracy, integrity and confidentiality, as well as the principle of accountability as per art. 5 of the GDPR.

The personal data of Users will therefore be processed in agreement with the legislative provisions of the Regulation and the obligations of confidentiality required therein.

Processing of personal information means any operation or set of operations, carried out with or without the aid of automated processes and applied to personal information or sets of personal information, such as the collection, the registration, the organization, the structuring, the storage, the adaptation or the modification, extraction, the consultation, the communication by means of transmission, diffusion or any other form of making it available, the comparison or the interconnection, the limitation, the cancellation or the destruction.

The personal information which is the subject of processing may be made up of textual information, photographic or video images or of any other information that can identify the data subject or make him/her identifiable.

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## 1. Data Controller

**JVP S.r.l.** registered office Viale dell'Industria 16/20, Piove di Sacco (Padua), -Post code 35028 (Padua) **VAT Reg. no./Tax number** 02405330289

## 2. Personal information which is the subject of processing

### 2.1. Navigation data – *log files*

IT systems and applications dedicated to the functioning of this website record, during their normal functioning, some data (the transmission of which is implicit in the use of the communication protocols of the Internet) not associated with Users who can be directly identified.

The information collected includes the IP addresses and the domain names of the computers used by the Users who connect to the site, the addresses in URI (*Uniform Resource Identifier*) notation of the resources requested, the time of the request, the method used in making the request to the server, the dimension of the file obtained in response, the numerical code indicating the state of the answer given by the server (successful, error, etc.) and other parameters concerning the operating system and the IT environment used by the User.

This information is processed, for the time strictly necessary, for the sole purpose of obtaining anonymous statistical information on the use of the site and to check it functions correctly.

### 2.2. Information provided on a voluntary basis by the user

Voluntarily and explicitly sending email to the addresses shown in the different channels of access of this website and filling in the forms specifically prepared entail the subsequent acquisition of the address and information of the sender/user, necessary to meet the requests produced and/or to provide the service requested.

Specific concise privacy policies will be shown or displayed on the pages of the site for particular services on request.

### 2.3. Information of third parties provided voluntarily by the Users

In using particular services, the personal information of third parties, communicated to JVP S.r.l. by the User, may be processed.

With respect to these hypotheses, the User is the autonomous controller, assuming all the obligations and responsibilities according to the law.

In this sense, the User confers on this point the greatest relief of responsibility with respect to any contestation, claim, request for damages by the processing which may be received by the Data Controller from third party data subjects, whose personal information has been processed through the User's use of the services of the website in infringement of the applicable rules on the protection of personal data.

In any case, if the User provides or on any other way, processes personal information of third parties in using the Website, the same hereby guarantees – assuming every related responsibility – that this particular hypothesis of processing is based on the prior acquisition – by the User – of the consent of the third party to the processing of the information concerning them.

## 2. Purposes of the processing

The Website of JVP S.r.l. processes personal information within the limits of what is strictly necessary for performing the institutional functions, excluding the processing when the purposes pursued may be achieved by anonymous data or ways that allow identifying the data subject only if necessary. Specific purposes, relative to the individual processes, may be reported in detail in the various channels of access.

The User may find supplementary information in these channels on the processing of personal information.

The personal information collected through the JVP S.r.l. website may be used, with the consent of the data subject, to meet your requests of:

- Registration in the reserved area of our portal to use the services dedicated to those registered;
- Consultancy;
- Accreditation for events;
- sending our informative material concerning updates and initiatives through newsletters;
- Requests for information and contact;
- Purchase of products and services including through e-commerce;
- Sending a CV.

## 3. Methods of processing

The personal information is processed using automated instruments for the time strictly necessary to pursue the purposes for which it is collected.

Specific security measures are observed to prevent the loss of the information, unlawful or incorrect uses and unauthorized accesses.

#### **4. Optional nature of giving information**

The user is free to provide the personal information shown on the forms requesting the various services offered in the portal.

Failure to give the information compulsorily required will entail the impossibility of obtaining the service.

#### **5. Transfer, communication and disclosure of personal information**

No information is shared outside the European Economic Space. If shared, the Controller will adopt the precautions required by the legislation (e.g. agreements between States, contractual clauses etc.). The information may be transferred to suppliers of the Data Controller for the purposes shown.

The personal information of the Users who ask for informative material to be sent to them (mailing-lists, answers to queries, notices and newsletters, documents and provisions etc.) are used solely for the purpose of carrying out the service requested and is communicated to third parties only in the cases in which:

- This is necessary for the fulfilment of the requests (e.g. service of sending the documentation requested);
- Communication is compulsory according to law or regulations;
- During legal proceedings.

The processing connected with the web services of this website are managed exclusively by the Data Controller and by the suppliers to achieve the purposes shown.

#### **6. Storage of personal information**

The personal information processed for the simple navigation of the website will be stored for the time strictly necessary for this functionality.

For the purposes of requesting informative material or commercial information to be sent, the personal information will be kept for a period of 2 (two) years.

In any case, JVP S.r.l. has the right to keep the personal information of the Users for the required period of time admitted by Italian law to protect its interests pursuant to art. 2947 of the Civil Code.

#### **7. Rights of the data subject**

Pursuant to articles 15 and ff. of the GDPR, the Users have the right to ask JVP S.r.l., at any time whatsoever, for access to their personal information, the rectification or cancellation of the same, or to oppose their processing pursuant to article 21 of the Regulation.

The Users also have the right to request the limitation of processing in the cases under article 18 of the Regulation, as well as to obtain in a structured form, of common use and legible by an automatic device the information concerning them, in the cases according to article 20 of the Regulation.

The requests must be made in writing to the Data Controller at the address [privacy@jvph.net](mailto:privacy@jvph.net).

In any case the Users always have the right to make a complaint to the competent supervisory authority (Watchdog for the protection of personal information), pursuant to article 77 of the Regulation, if they deem that the processing of their information is contrary to the legislation currently in force.

## 8. Modifications

JVP S.r.l. reserves the right to modify or simply to update the contents of this *Privacy Policy*, in part or completely, including due to variations in the applicable legislation and will inform the Users as soon as any modifications are introduced.

JVP S.r.l. invites the Users to regularly visit this section to learn of the most recent and updated version of the *Privacy Policy* in order to be always updated on the information collected and on the use made of it.

## 9. Contacts

To exercise the rights as above or for any other request, please write to the Data Controller:

- **JVP S.r.l., registered office** Viale dell'Industria 16/20, Piove di Sacco (Padua), - Post code 35028 (Padua) **VAT Reg. no./Tax number** 02405330289;
- @ [privacy@jvph.net](mailto:privacy@jvph.net);
- certified email: [jvp@pec.jvph.net](mailto:jvp@pec.jvph.net)