

**PRIVACY DISCLAIMER
ON THE PROCESSING OF PERSONAL DATA
OF USERS OF WHER APPLICATION**

Article 13 of the EU Regulation 2016/679 of 27/04/2016 (General Data Protection Regulation, hereinafter referred to as **GDPR**) inform you about necessary information regarding the processing of personal data provided by you through the use of the Wher application and related services.

This disclaimer explains which personal data we collect, for what purposes, how we treat them and which are your rights.

We are aware of the fact that providing your personal data involves a high level of trust and that confidentiality and protection of personal data are fundamental rights. Therefore, it is our primary objective to treat your personal data in compliance with the GDPR EU Regulation.

1. Data Controller

The Data Controller, in accordance to articles 4 and 24 of the GDPR, is the Italian company **FREEDA S.R.L.** (C.F. and VAT No. 11582450018), in the person of its legal representative pro tempore, with registered office in Turin in via Maria Vittoria n. 38 (hereinafter the **Data Controller**). The data controller can also be contacted by e-mail at the following address privacy@w-her.com.

2. Purpose of processing

The processing is aimed at the correct and complete execution of the services provided by the Wher application (**the app**). More precisely, the personal data you provide will be used for the following purposes:

- a) allow the registration and management of your Wher account, including access to and use of the app (including for example the publication of evaluations, comments and other content in the community), according to the [conditions and terms of use of the app](#);
- b) communicate with you, for example to send you information about Wher, newsletters and invitations to community events, measure your interest in order to improve the app and the service, request opinions, for example through surveys.
- c) fulfil legal obligations and resolve any disputes or problems.

3. What data we are collecting

The Data Controller collects the personal data that the user (**the interested**) provides when he registers with the app (via his Facebook or Google account) and when he uses the app. To register and access to the services offered by the app, you must be at least 14 years old.

The personal data processed for the purposes indicated in letter **a)** of the previous point consist specifically: ID of the social account (Facebook or Google) used for registration; name and surname used on the Facebook or Google account; sex; age group or (if specified) date of birth; city; link to the profile photo of the Facebook or Google account used (you can choose to hide the profile photo from other users of the app); e-mail address (if provided); mobility habits (i.e. the type of preferred means of transport, to be chosen from the following: bicycle, feet, car, public transport); the IP address used to connect to the app; the electronic device used and the version of the respective operating system; the history of accesses / uses of the app. Of the aforementioned data those treated also for the specific purposes referred to in letter **b)** are: name and surname used on the Facebook or Google account; city; email address. For the purposes indicated in letter **c)** we use: name and surname used on the Facebook or Google account; IP address; email address.

4. Legal basis of processing and mandatory or optional data providing

All data required for the purposes referred to in letters **a)** and **c)**, except for the email address and mobility habits, are mandatory for the execution of the services provided by the app (Article 6 letter b) GDPR) and the fulfilment of legal obligations (Article 6 letter c) GDPR). Therefore, your refusal to provide such data will make it impossible for the owner to establish and manage the relationship itself and to provide the services requested. By accessing the app and related services you consent to the processing of such data.

With reference instead to the purposes referred to in letter **b)**, consent is optional and your specific and explicit consent represents the legal basis of the processing. In the event of failure to consent to the aforementioned treatment, it will not be possible to carry out the activities provided therein.

5. Data processing and updating

The processing of personal data will be carried out by the Data Controller exclusively for the aforementioned purposes, both on paper and computer and electronic media (including portable devices), in compliance with current legislation on confidentiality, security and in compliance with the principles of correctness, lawfulness, transparency and protection of your rights. The processing is carried out directly by the owner's organization and / or by his own internal representatives or external managers, for this purpose specifically appointed and instructed. It is important that the data held by the Data Controller are correct, accurate and up-to-date, therefore, if the data you provide, including through social accounts, are incorrect or subsequently modified, it is necessary that you promptly

notify us of the corrections or changes through the Wher application or by writing to privacy@w-her.com. **Your personal data will in no way be the object of communication, transfer and disclosure to third parties.** The data provided may be communicated only to collaborators of the Data Controller (internal Officers or external Managers), who in any case must be able to provide all the guarantees in order to ensure full compliance with the provisions on the processing of personal data as well as to guarantee the protection of your rights and must act under the authority and instructions of the owner exclusively for the purposes described above. The complete and updated list of internal representatives and external managers can be consulted by sending a request to the e-mail address: privacy@w-her.com. Personal data in electronic format will be stored on servers located within the European Union and will not be transferred to non-EU countries. If it is necessary, in order to comply with the purposes connected with the treatment, to provide for a transfer of data outside the European Union, this will take place in compliance with the limits and conditions established in art. 44 et seq. of the GDPR.

6. How long we keep your data

In compliance with the provisions of art. 5 paragraph 1, lett. e) of the GDPR personal data will be stored, in a form that allows the identification of the user (Interested), for a period of time not exceeding the achievement of the purposes for which they are treated. And more precisely, the data collected for the purposes indicated in letters **a)** and **b)** of art. 3 of this information will be kept for the entire duration of registration. The data relating to the purposes referred to in letter **c)** may be retained for a longer period, determined on the basis of current legislation and specifically for a maximum period of ten years.

7. What are your rights

As an interested party, you may at any time assert the following rights provided for in articles 15 and ss. of the GDPR:

- request access to personal data or the confirmation of the processing of personal data and indications about categories of personal data processed, the purposes of processing, any recipients or categories of recipients to whom the personal data are communicated and, where possible, their retention period (**right of access**);
- to rectify inaccurate or incomplete data (**right of rectification**)
- to cancel personal data if one of the conditions indicated in the art. 17, paragraph 1 of the GDPR occurs and in compliance with the exceptions provided in paragraph 3 of the same article (**right to cancellation**);
- obtain the limitation of the processing, in the cases provided by art. 18 of the GDPR (**right to limit the treatment**);
- obtain data portability, i.e. receive them from the Data Controller, in a structured format, commonly used and readable by an automatic device, and transmit them to another Data Controller without hindrance (**right to the portability of personal data**);
- oppose the processing, including automated processes, if is not possible to obtain the deletion of the data by legitimate reasons (**right of opposition**);
- revoke the consent, in the cases in which the treatment is based on your consent, without prejudicing the lawfulness of the processing based on the consent given before the revocation (**right to revoke the consent**);
- make a complaint to the Authority (Data Protection Authority) (**right of complaint**).

To exercise previous rights, or for questions, clarifications and information regarding the processing of your data and the security process adopted, you can forward your request to the following address:

FREEDA S.R.L.
Via Maria Vittoria n. 38
10123 - TORINO
E-mail: privacy@w-her.com

8. Changes to this statement

This disclaimer may change over time. We recommend that you always refer to the most up-to-date version, available at the website www.w-her.com.

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