

# Privacy Policy of VipHouses Investments" pursuant to Article 13 of the EU Regulation 2016/679 ("GDPR").

## OWNER AND RESPONSIBLE FOR THE TREATMENT OF PERSONAL DATA

VipHouses Investments srl, with registered office in Str. Abrud 99 bl. 162 (Arad) Romania CUI RO-38837883 (hereinafter referred to as "VipHouses Investments"), as the Data Controller, shall process your personal data provided through the website [www.viphousesinvestments.com](http://www.viphousesinvestments.com) (hereinafter referred to as the "**Website**") in accordance with the provisions of the applicable legislation on privacy and personal data protection and this Policy.

## PERSONAL DATA PROTECTION OFFICER (RPD)

VipHouses Investments has appointed a Data Protection Officer (DPO) who can be contacted at the following email address: "assistenza@viphousesinvestments.com"

## OBJECT AND MODALITIES OF TREATMENT

1.1 VipHouses Investments will process personal data communicated by you or legitimately obtained by you ("**Personal Data**").

In particular, the following Personal Data are processed:

1.1.1 **Data of the reserved area:** at the time of creating an *account* you will be asked to provide some personal information (eg name, surname, e-mail address, cell phone number), necessary to successfully complete the registration and the use of related services. VipHouses Investments also allows you to access the private area, or through the use of credentials provided by a social network (so-called "social login").

1.1.2. **Payment Data:** in case of purchase of products or services, payment data, including identification details, are also processed in accordance with current legislation.

1.1.3. **Contact data:** if you intend to ask questions to VipHouses Investments by writing to the email addresses listed on the Site, your email address and the content of the message will be processed. The processing of this Personal Data is necessary in order to reply to the communication received. The conferment of further data must be considered absolutely optional.

1.1.4. **Navigation data:** the computer and telematic systems and software procedures used to operate the Site acquire, during their normal operation, some data (e.g. the date and time of access, the pages visited, the name of the Internet Service Provider and the Internet Protocol (IP) address through which you access the Internet, the Internet address from which you connected to the Site, etc.), the transmission of which is implicit in the use of web communication protocols or is useful for better management and optimization of the system for sending data and e-mail.

1.1.5. **Data acquired by Customer Service:** data provided during interactions with the Customer Service of VipHouses Investments, including recordings of phone calls, if you have consented to the recording.

1.2. Processing of Personal Data for the purposes of this Policy shall mean any operation or set of operations, carried out with the help of automated processes and applied to Personal Data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction.

1.3. We inform you that such Personal Data will be processed manually and/or with the support of computer or telematic means.

## **PURPOSE AND LEGAL BASIS OF PROCESSING**

1.1. VipHouses Investments will process your Personal Data for the achievement of specific purposes and only when there is a specific legal basis provided for by the applicable law on privacy and personal data protection. In particular, VipHouses Investments will process your Personal Data only when one or more of the following legal bases apply:

- you have given your free, specific, informed, unequivocal and express consent to the treatment;
- the processing is necessary for the performance of a contract to which you are party or the implementation of pre-contractual measures taken at your request;
- in the presence of a legitimate interest of VipHouses Investments;
- VipHouses Investments is required by law to process Personal Data.

1.2. The provision of your Personal Data is necessary in all cases in which the treatment is based on a legal obligation or to perform a contract to which you are party or the execution of pre-contractual measures taken at your request. Any refusal to do so may make it impossible for VipHouses Investments to carry out the purpose for which the Personal Data is collected.

1.3. The conferment of your Personal Data is instead voluntary for the pursuit of the further purposes indicated in the table. Failure to provide your consent in relation to these latter purposes will have no consequence on the conclusion of the contract. The compulsory or optional nature of the conferment will be specified at the time of collection.

## **RESERVED AREA REGISTRATION VIA SOCIAL LOGIN**

1.1. Access to the reserved area is allowed by the following means:

- creating an *account* on the Site;
- through the use of credentials provided by a social network (so-called "social login"), in particular the identities created on Facebook, Twitter, Instagram, LinkedIn, Tik Tok.

1.2. In the event that you decide to access the private area through the credentials of a *social network*, VipHouses Investments will acquire some of your personal data (Name, Surname, Email) in accordance with the authorizations issued by you to the *social network* of reference.

You are therefore required to verify the settings provided by the *social network of* reference and to read carefully the privacy policy, as the same may authorize the *social network* to share with VipHouses Investments your personal data authorizing, therefore, VipHouses Investments to collect information such as contacts, friends and other personal data. In any case VipHouses Investments will not be aware of the registration data used by you.

1.3. VipHouses Investments will retain the identification code associated with your *account* at the *social network* service of reference when you use it to *login* to VipHouses Investments or to share content hosted by the Site; storage will take place for as long as necessary to provide the services requested.

1.4. If you create a VipHouses Investments *account* or use services on the Site by connecting through *social login*, VipHouses Investments may use the information contained in the originating *account* to complete your profile on the Site. You may at any time update or change your profile information and contact information through your *social login*.

## **MARKETING AND PROFILING PURPOSES**

1.1. The e-mail address you provided as part of the relationship with VipHouses Investments may be used by the latter to send commercial offers for products and / or services similar to those previously purchased. You may at any time object to the treatment by sending a request to the mailbox dedicated [assistenza@viphousesinvestments.com](mailto:assistenza@viphousesinvestments.com).

1.2. For all matters not included in the preceding article, within the reserved area you may freely decide whether to consent to the use of your Personal Data for sending advertising material, direct sales, commercial communications or for carrying out market research, relating to products and/or services offered by VipHouses Investments, by subsidiaries and/or associates or commercial partners of VipHouses Investments.

1.3. In addition, within the reserved area you will be able to freely decide whether to consent to the use of your Personal Data for collection by VipHouses Investments or by our parent, subsidiary, associated companies or business partners.

1.4. The processing of Personal Data for the aforementioned purposes may be carried out using "traditional" methods (by way of example, paper mail and/or operator calls), or through "automated" contact systems (by way of example, SMS and/or MMS, telephone calls without operator intervention, e-mail, fax, interactive applications).

1.5. The consent given by you for marketing purposes will be understood to be given for both the methods indicated, without prejudice, however, to your right to object, even in part, in relation to the various communication channels through which the marketing purposes are carried out, in the same manner as indicated in this statement.

1.6. Consent for the above purposes is optional and does not prevent the possibility of using the services available in the same.

Specifically:

- Subject to free and specific consent, to be issued within the restricted area in the "Consent Management". Such Personal Data may be disclosed to VipHouses Investments for the sending, by the latter, of promotional material, advertising and commercial communications,

as well as for the promotion of direct sales relating to products / initiatives of that company. These activities may be carried out using "traditional" methods (for example, paper mail and / or call with operator) or through "automated" systems of contact (for example, SMS and / or MMS, phone calls without the intervention of an operator, e-mail, fax, interactive applications).

- Subject to free and specific consent, to be issued within the restricted area in the "Consent Management", such personal data may also be disclosed to companies and third parties, business partners of VipHouses Investments, to which VipHouses Investments may communicate / transfer the data acquired for the above marketing purposes
- Subject to free and specific consent, to be given in the reserved area in the "Consent Management" section, associates or commercial partners of VipHouses Investments may carry out analyses and processing, including nominative ones, of your profile and consumption habits, in order to propose personalised products and services which are more in keeping with and functional to your interests and needs.

## **RECIPIENTS OF PERSONAL DATA**

Your Personal Data may be made accessible, for the purposes mentioned above:

- to the employees and collaborators of VipHouses Investments, agents, specifically appointed as Persons Authorized to Processing, who may act as autonomous Holders, or as Persons Responsible for processing, appointed for this purpose;
- to third party companies or other subjects ("Third Parties") who carry out certain activities in outsourcing on behalf of VipHouses Investments, in their capacity as external data processors,
- to third parties, parent, subsidiary or associated companies or business partners of VipHouses Investments, for direct marketing purposes, in compliance with the requirements of the GDPR, after obtaining your consent.

## **TRANSFER OF PERSONAL DATA**

Your Personal Data will be processed within the European Union and stored on servers published within the European Union.

## **PERSONAL DATA RETENTION PERIOD**

1.1. Personal Data processed for the above purposes will be stored in accordance with the principles of proportionality and necessity, and in any case until the purposes of the processing have been pursued.

1.2. Your Personal Data will normally be retained for as long as the business relationship with the Data Controller continues, except for the needs of collecting outstanding receivables and/or data management in the event of any disputes or claims, such as those relating to invoices issued.

1.3. Your Personal Data will normally be kept until you revoke your consent and, in any case, will be deleted automatically after 10 years from the termination of the contractual relationship, without prejudice to the possible retention of the same where necessary for the management of legal proceedings in progress and the fulfillment of specific legal obligations.

## **RIGHTS OF THE INTERESTED PARTIES**

1.1 Pursuant to Articles 15 - 22 of the GDPR, in relation to the Personal Data disclosed, you have the right to:

- access and request a copy;
- request rectification;
- request cancellation;
- obtain the limitation of the treatment;
- oppose the treatment;
- to receive such data in a structured, commonly used and machine-readable format and to transmit such data without hindrance to another data controller (where technically feasible).

1.2. We inform you that you have, however, the right to object at any time to the processing of Personal Data concerning you carried out for direct marketing purposes, including profiling, insofar as it is related to such direct marketing.

The right to object to such processing by automated means of contact also extends to the processing of Personal Data by traditional means of contact, unless you wish to object only in part.

1.3. If you object to processing for direct marketing purposes, your Personal Data will no longer be processed for such purposes.

1.4. To exercise your rights and to revoke your consent you may send a communication to the following email address: [assistenza@viphousesinvestments.com](mailto:assistenza@viphousesinvestments.com)

1.5. For further information regarding your Personal Data, you may contact the Data Protection Officer, who can be reached at the following e-mail address: [assistenza@viphousesinvestments.com](mailto:assistenza@viphousesinvestments.com)

1.6. We remind you that it is your right to lodge a complaint with the Guarantor for the Protection of Personal Data.

## **COOKIE POLICY**

### **1. Definition of Cookies**

1.1. Cookies are small text strings that the sites visited by the user send to the device used (e.g. computer, tablet, smartphone, notebook, etc..), where they are stored and then retransmitted to the same sites the next time the same user visits.

Cookies may be subject to prior consent.

1.2. The cookie makes it possible to identify the device in which it is stored throughout its period of validity or registration. During visits to the Site, information relating to navigation data received by the user's device may be stored in "cookies" installed on that device.

1.3. Cookies perform various functions and allow you to navigate the Site efficiently, remembering your preferences and improving your browsing experience.

They may also help personalize the advertisements shown to him while he is browsing and the marketing activities directed to him, ensuring that they are carried out in a manner consistent with his interests and preferences.

1.4. You can change your cookie settings at any time. Below is more information about the cookies used by the Site and how to manage your cookie settings.

## 2. Types of Cookies Used

2.1. When you connect to the Site through your browser, cookies may be installed on your device in order to recognize your device, ensure your use of the Site for the duration of the validity period of the cookies and collect information about your access to the Site.

2.2. While browsing the Site, the user may also receive cookies on his terminal that are sent by different sites or web servers (so-called "third parties"), on which some elements (e.g. images, maps, sounds, specific links to pages of other domains) present on the site he is visiting may reside. There may be, therefore, under this profile

2.2.1. **First-party cookies**, sent directly from VipHouses Investments to the user's device.

2.2.2. **Third-party cookies**, originating from a third party but sent on behalf of VipHouses Investments.

2.3. Depending on the purpose for which cookies are used, they can be distinguished in:

2.3.1. Technical Cookies: their use is strictly limited to the transmission of session identification data (random numbers generated by the server), necessary to allow the safe and efficient exploration of the Site; they are not permanently stored on the user's computer and disappear when the browser is closed. The use of such cookies is aimed at the security and improvement of the service offered.

2.3.3. Cookie Analytics: VipHouses Investments uses analytics cookies in order to analyze the number of users and how they use the Site, information that is collected in aggregate form.

2.3.4. Profiling cookies: profiling cookies are designed to create profiles of the user and are used to send advertising messages in line with the preferences expressed by the user when browsing the web or to improve the browsing experience. These cookies can be used for these purposes only with the user's consent.

2.3.5. Social Plugin: The Site contains plug-ins from *social networks* (e.g. Facebook, Twitter, LinkedIn, Instagram, Pinterest, etc.). By accessing a page of the Site with such a plug-in, the Internet browser connects directly to the servers of the *social network* and the plug-in is displayed on the screen thanks to the connection with the browser.

Even if the user is not registered to *social networks*, websites with active *social plugins* can send data to the *networks*. Through an active plugin, an encrypted cookie will be set each time you access the Site. Since the user's browser at each connection with a server of a *network* sends this cookie without request, the *network* may create a profile that recalls websites that the user has visited. In this case, it is possible to trace the encryption back to a person, for example, when the user connects to the *social network*.

## 3. Managing cookies through your browser settings

3.1. Almost all Internet browsers allow you to check what cookies are on your hard drive, block all cookies, or receive a warning whenever a cookie is installed.

In some cases, however, failure to install a cookie may result in the inability to use certain parts of the Site.

3.2. Below are the methods offered by the main browsers to allow the user to express their options regarding the use of cookies:

- Internet Explorer
- Chrome
- Firefox
- Opera
- Safari
- Android.

3.3. If you use a mobile device, you should refer to its instruction manual to find out how to manage cookies.

3.4. For more information about cookies, including how to view those that have been set on your device, how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

3.5. Facebook and Adobe Marketing Cloud cookies can be rejected according to the procedure indicated by the two providers. Therefore, by using the Site without rejecting these cookies, you consent to the processing of your data by Facebook and Adobe Marketing Cloud in the manner and for the purposes set out above only.

3.6. To view Facebook's privacy policy, please visit <https://www.facebook.com/policies/cookies/>. To view Adobe Marketing Cloud's privacy policy, please visit <https://www.adobe.com/it/privacy.html>.

3.7. Google Analytics cookies can be rejected according to the procedure indicated by Google (<https://tools.google.com/dlpage/gaoptout?hl=it>).

Use of the Site without rejecting Google's cookies implies the user's consent to the processing of his/her data by Google, limited to the aforementioned methods and purposes.

To consult the privacy policy of the company Google, relating to the Google Analytics service, the user is asked to visit the website <http://www.google.com/analytics/learn/privacy.html>. To know the privacy policy of Google, please visit the website <http://www.google.com/intl/it/privacy/privacy-policy.html>.

3.8. If you do not wish to associate your visit to the pages of the Site with your social account, you must log-off.

3.9. For more information about the processing and use of data through *social networks*, as well as privacy settings, you should check the privacy policies of the respective *social networks* or websites.

For more information on the processing of your personal data, please see our Privacy Policy.

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