

Full privacy policy

The protection of your privacy is one of our main objectives.

Register S.p.A. (hereinafter “Register”), with registered office in Viale della Giovine Italia 17, Florence, CAP 50122, undertakes to constantly protect the privacy of its users on-line. This document outlines our policy on privacy, explaining how your personal data are managed when using our services, and to enable you to give express consent to the processing of your personal data while being aware of the website sections requiring the entry of such data. Note that the various sections of the web sites of Register (hereinafter “Site”) requiring entry of your personal data may contain specific disclosure options in accordance with art. 13 of the Regulation (EU) 2016/679 (hereinafter “GDPR”), which must be viewed by you before providing the requested data. The information and data supplied by you or otherwise acquired when registering for the various services of Register, (for example to register domain names, to supply an email account, to supply a certified email account (PEC), supply web space, supply hosting services, supply other accessory services, hereinafter referred to in general as “Services”), will be processed in observance of the provisions of the GDPR and the obligations for confidentiality that form the basis of the work of Register. In accordance with the provisions of the GDPR and the Legislative Decree 196/2003 and its subsequent amendments (hereinafter “Italian Data Protection Code”), the processing operations carried out by Register will comply with the principles of lawfulness, fairness, transparency, purpose and retention limitation, data minimisation, accuracy, integrity and confidentiality.

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1. Data Controller and Data Protection Officer and representative in the United Kingdom

The controller of the processing operations carried out through the Site is Register (hereinafter “Controller” or “Data Controller” or “Company” or “Register”). The Data Controller’s organisation comprises a Data Protection Officer (hereinafter “DPO”). The DPO is available for any information regarding the processing of the personal data carried out by Register. It is possible to contact the DPO by writing to [dpo\(at\)register.it](mailto:dpo(at)register.it).

With specific regard to the activities carried out by Register through the services of Facebook Inc., as described in Section 3 (h) of this policy, Register acts as a joint controller of the processing together with Facebook Inc.: please refer to Section 3 (h) of this policy for more information. Register has designated as its representative in the United Kingdom the company Namesco Limited, with registered office in Acton House, Perdiswell Park, Worcester, WR3 7GD. The representative may be contacted at the following e-mail address: dc(at)names.co.uk.

2. Personal data undergoing processing

Processing of personal data means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We inform you that the personal data undergoing processing - depending also on how you intend to use the Services - may consist of an identifier such as the name, e-mail address, ID number, location data, online identifier, purchases made and other data enabling you to be identified or identifiable, depending on the type of Services requested (hereinafter "Personal Data").

In particular, the Personal Data processed through the Site are the following:

a. Browsing data

The computer systems and software procedures used for operation of the Register web site acquire, during routine operation, some personal data, the transmission of which is considered implicit in the use of the Internet communication protocols. This information is not collected to be associated with identified persons, but which in their nature may, through processing and associations with data retained by third parties, enable the identification of users. This category of data includes IP addresses or domain names of the computer used by the users to connect to the site, URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the dimensions of the file obtained in the response, the numerical code indicating the status of the response sent by the server (successful, error, etc.) and other parameters regarding the operating system and IT environment of the user. These data are used exclusively to retrieve anonymous statistical information on use of the present site and the sites of our clients, and to ensure correct operation of the latter, identify faults and/or abuse, and are deleted immediately after processing. The same data may be used to ascertain responsibility in the hypothetical case of computer crime harmful to the site or third parties: with the exception of this case, the data on web contacts are not stored for more than fourteen days, unless specific requests are made by the user (e.g. access to the user's personal pages within Register summarising services used, information published etc.).

b. Data processed during engagement with social media

Besides filling out the appropriate registration form, you can register to the Services if you have a Facebook profile by just clicking on the "Login with Facebook" button. In this case, Facebook will automatically send Register some of your Personal Data, indicated in the pop-up window, which appears upon applying, and you will not need to fill out any other forms. If, instead, you are already a registered user of Register and also have a Facebook profile, you can choose to associate your Register account to your Facebook account by clicking on "Login with Facebook" and then on "Associate Account": this way, your Register identification code will be associated to your Facebook user code, and you can then directly authenticate yourself by just clicking on "Login with Facebook" to your Register control panel without entering any credentials.

In the same way, Register gives you the possibility of associating your Register account to any Google, Twitter and LinkedIn accounts. In such cases too, these social media sites will automatically send Register some of your Personal Data, indicated in the pop-up window, which appears upon applying.

c. Data provided voluntarily by the data subject

When using specific Services (such as Register promotions allowing the assignment of domain names to third parties), the Personal Data of third parties that you submit to the Service Manager may undergo processing. In such case, you are considered an independent data controller, assuming all the obligations and responsibilities of law. To this effect, you fully indemnify in this regard Register against any complaints, claims and demands for compensation for damages arising from processing, etc., that may be received by Register from third parties whose Personal Data have been processed through the use of the Services, in violation of the applicable rules on personal data protection. In any case, if you provide or in other way process Personal Data of third parties in using the Service, you henceforth guarantee - assuming all related responsibilities - that this specific processing is grounded on an appropriate legal basis (for example, the data subject's consent) in accordance with art. 6 of the GDPR, which legitimizes the processing of the information in question.

d. Domain name registration data

With regard to the processing operations of Personal Data carried out as part of the domain name management service, it should be noted that Register will only implement the processing operations deemed strictly necessary for providing the service, with the exception of further processing operations grounded on an appropriate legal basis, pursuant to art. 6 of the GDPR (for instance, your consent). The data collected by Register as part of an application for domain name registration are solely those strictly necessary for the provision of the service and are listed in the Service Order in section 4.3. The provision of such data is in itself optional, however, failure to provide such data entails that Register will not be able to provide the requested service. It should be noted that the Personal Data of the domain name holder, for purposes strictly related to the provision of the service, may be disclosed to third parties. Specifically, in order to manage domain names, the Internet Corporation for Assigned Names and Numbers (hereinafter "Icann") requires Register, as a registrar, to place in escrow to a licensed Escrow Agent a copy of the data needed to register a domain name under the authority of Icann itself.

Such service is provided to Register by Iron Mountain Intellectual Property Management, Inc., designated by Icann.

Additionally, the data may be disclosed to the national and international Registration Authorities to which Register is required to send the technical and administrative documentation under the relevant legislation, and to any other subjects accredited for the registration of domain names with regard to extensions for which Register lacks accreditation. Such data sharing is required in order to use the service; therefore, in accordance with the privacy legislation in force, data sharing is justified under art. 6 (1) (b) of the GDPR. It follows that when you sign up for the service, you agree to the disclosure of some of your Personal Data to the above subjects. If, instead, when applying for domain name registration, you provide Register with Personal Data of other third parties involved in the processing, you are considered an independent data controller, assuming all the obligations and responsibilities of law. To this effect, you fully indemnify in this regard Register against any complaints, claims and demands for compensation for damages arising from processing, etc., that may be received by Register from third parties whose Personal Data have been processed through the use of the Services, in violation of the applicable rules on personal data protection. In any case, if you provide or in other way process Personal Data of third parties in using the Service,

you henceforth guarantee - assuming all related responsibilities - that this specific processing is grounded on an appropriate legal basis in accordance with art. 6 of the GDPR, which legitimizes the processing of the information in question. Additionally, in order to improve the service, the data will be generally published, and therefore disclosed, on the WHOIS public database containing the Personal Data of the domain name assignees. With regard to this processing, note that Icann acts as an autonomous data controller and Register has no control whatsoever on the personal data processing activities performed by the said subject. Icann policies are currently under review and any development in this regard shall be appropriately notified. Additionally, domain names could be published on the WHOIS database managed by the relevant Authorities which, in their turn, are currently amending their policies on the publishing of personal data. We hereby clarify that these subjects act as autonomous data controllers and that Register, which in order to perform its domain registration service needs to disclose the registrant data to these subjects (failing which it would not be possible to perform the service), has no control whatsoever on the personal data processing activities performed by these subjects. Register, insofar as it concerns it and as part of its provision of domain names, shall not publish your Personal Data, but such data may be disclosed to third parties on an individual basis, under express and duly documented request, for purposes of protection of industrial property rights, as better described at paragraph 3.i of this policy.

e. Traffic data

As part of the e-mail service, Register processes certain data for the transmission of communications on the electronic communications network. These data are listed in Legislative Decree no. 109 of 30 May 2008, and are specifically:

- IP address used, e-mail address and any further sender ID;
- IP address and fully qualified domain name of the mail exchanger host for SMTP technology, or any type of host for a different technology used in the transmission of communication;
- e-mail address and any further ID of the recipient of the communication;
- IP address and fully qualified domain name of the mail exchanger host (for SMTP technology), or any type of host (for a different technology used) that delivered the message;
- IP address used by the recipient for receiving and/or browsing e-mail messages, irrespective of the technology or protocol used;
- date and (GMT) time of the log-in and log-off of the user of an Internet-based e-mail service, along with the IP address used, irrespective of the technology and protocol applied;
- Internet service used.

These data are processed and retained by Register to provide the service and by legal obligation - specifically, for detecting and suppressing criminal offences - adopting stringent security measures that make them accessible only to specially authorized persons in writing, who access them exclusively prior to a request of the judicial authority, accompanied by a reasoned order issued by a public prosecutor and, in any case, with highly sophisticated authentication techniques provided for by law. As required by law, the personal data are retained by Register for the purpose of ascertaining and prosecuting crime for six years after their collection. Additionally, the data are processed by Register for the typical activities following from the provision of the service (for instance, for documentation purposes in the event of billing disputes or payment claims, for fraud detection, and to carry out analysis on behalf of the customers), in accordance with the law. In such case, the personal data are retained, meanwhile adopting stringent security measures as provided for by law, for six months from their collection, and subsequently deleted.

f. Data processed in the context of the PEC service.

For specific information on the data processing activities performed by Register as data controller in the context of the PEC services, please refer to the “Informativa privacy PEC”, available at the following link: <https://www.register.it/company/legal/#pgc-22195-3-0> (information notice available only in Italian).

g. Data processed in the context of the SPID service.

For specific information on the data processing activities performed by Register as data controller in the context of the SPID services, please refer to the “Informativa privacy SpidItalia”, available at the following link: <https://www.register.it/assistenza/manuali-spid/>

3. Purposes of processing, legal basis and mandatory or discretionary nature of processing

The purposes of the processing we intend to carry out, following your express consent where necessary, are the following:

- a. to allow us to provide the Services you requested and the subsequent, independent management of your control panel, which you will access by registering and creating your user profile on providing the Services, including the collection, retention and processing of data for the establishment and subsequent operational, technical and administrative management of the relationship arising from the provision of the Services, and the exchange of messages during the course of the relationship;
- b. to allow you to browse and explore this website;
- c. to answer requests for assistance or information, which we will receive via e-mail, telephone or chat through the "[Contact us](#)" section of our Site, or through the appropriate "[Privacy Notices](#)" form at <https://www.register.it/company/segnalazioni-privacy.html?lang=en> or by clicking on the "CONTACT US ON WHATSAPP" button on the page "<https://www.register.it/siti-web/realizzazione-siti/sito-evoluto/>", aimed at allowing users who request the creation of their own website to interact with Register operators. For answers to telephone requests for assistance received by Register, we inform you that the calls are going to be recorded so that Register can prove it has properly handled requests received. With regards to requests received by Register by e-mail, they too will be retained, together with the appropriate replies, for the time necessary to assure the correct processing of the requests, as well as, subsequently, to allow Register to defend itself in court, where necessary. Requests received by clicking on the "CONTACT US ON WHATSAPP" button on the page "<https://www.register.it/siti-web/realizzazione-siti/sito-evoluto/>" will be managed through the use of the WhatsApp application, which privacy policy is available at this address: <https://www.whatsapp.com/legal/privacy-policy-eea>. The legal basis for the processing of Personal Data for the purposes referred to in letters (a), (b) and (c) above is art. 6(1)(b) of the GDPR as the processing is necessary for the provision of contractual services. The provision of Personal Data for these purposes is optional, but failure to provide it entails the impossibility to activate the requested Services. On the other hand, with specific regard to the recording of telephone calls, the processing is based on art. 6 (1)(f) of the GDPR, as Register has a legitimate interest in ensuring effective and consistent service, as well as in pursuing the improvement of the service itself. This interest, according to the balancing assessment carried out by the Data Controller, prevails over data subjects' fundamental rights and freedoms, also taking into account the security measures applied to the recordings. If you do not wish for this processing to take place, we invite you to submit only written requests to our customer service and to avoid the use of the telephone. With regard to the data which is necessary to demonstrate that the Company has correctly provided services and answered requests, the relevant data retention is based on the Company's legitimate interest of being able to exercise its right of defense in court where necessary;
- d. to fulfil legal, accounting and tax obligations: this processing is legitimate under art. 6(1)(c) of

the GDPR. Once the Personal Data has been provided, the processing may indeed be necessary to comply with legal obligations to which Register is subject; and in those cases, it is not possible for the users to object to this processing, since it is a processing operation deriving from legal obligations;

e. to carry out direct marketing activities via e-mail for services similar to those you have subscribed to, unless you objected to such processing initially or in subsequent communications, in order to pursue Register's legitimate interests to promote products and services which you may be reasonably interested in; this processing is based on the assumption of lawfulness under art. 130, paragraph 4 of the Italian Data Protection Code: "if the owner of the processing uses, for the purpose of direct sale of its products or services, the e-mail address provided by the data subject in the context of the sale of a product or service, the consent of the data subject may not be required, provided that these services are similar to those being sold and the data subject, who is adequately informed, does neither at first nor in the occasion of subsequent communications refuse such uses. The Data Subject, at the time of collection and at the time of sending any communication made for the purposes referred to in this paragraph, is informed of the possibility to object at any time to the processing, in an easy manner and free of charge"; objections to this processing have no impact on the use of services;

f. to conduct studies, research, market statistics; to send you advertising and information material, commercial information, or surveys to improve the service ("customer satisfaction") via e-mail or SMS, and/or over the telephone through operator and/or through the official pages of Register on social media as well as through your control panel, if you are a Register customer; furthermore, if you are a Facebook user, you may see Register advertising banners on your Facebook profile (hereinafter reference will be made to the activities listed herein as "Marketing"): the processing of your data for Marketing purposes is based on your consent pursuant to art. 6(1)(a) of the GDPR. You may object to the processing of your data for Marketing purposes through your control panel, or by sending a request from the Site <https://www.register.it/company/segnalazioni-privacy.html>, or through the mechanism specified in the footer of commercial e-mails, or by writing to [dpo\(at\)register.it](mailto:dpo@register.it). Objections to this processing have no impact on the use of services. From time to time, Register carries out specific Marketing activities, together with other companies of the team.blue Group, acting as joint controllers with Register; in particular:

i. the sending of personalized advertising material via e-mail, jointly with the company Iubenda S.r.l., with registered office in via San Raffaele, 1 - 20121 Milan ("Iubenda"). In particular, the activity consists in uploading a list of domains relating to Register's customers, associated with their e-mail address, on a platform managed by Iubenda, on the basis of Register's legitimate interest in carrying out joint marketing activities with other companies of the team.blue Group. Subsequently, Iubenda scans the domains in order to detect any non-compliance of the website with respect to the privacy legislation and, in case one or more non-compliances are detected, links the scan result with each e-mail address uploaded to the platform, based on Iubenda's legitimate interest in carrying out joint marketing activities with other Group companies. This activity will be performed only where you have previously given your consent to Register in order to carry out Marketing activities; therefore, the legal basis of this processing activity is your consent, pursuant to art. 6 (1) (a) of the Regulation. Register has agreed with Iubenda that Register is the main contact point for the exercise of your rights: therefore, you can object to this processing in the same ways indicated above in relation to Marketing activities and you can in any case exercise the rights indicated in paragraph 7 below by writing to [dpo\(at\)register.it](mailto:dpo@register.it).

g. only with regard to certain services, the data may be processed for disclosing to third parties for their marketing purposes, namely to provide you with information and/or to propose offers on products, services or initiatives offered or promoted by other companies of the team.blue Group and/or its affiliates and/or subsidiaries and/or other business partners and outsourcers who act as independent data controllers: this processing is also based on your consent, pursuant to art. 6(1)(a)

of the GDPR, which may be given specifically; any refusal to grant consent has no effect on the use of the services;

h. to make personalised commercial suggestions based on the products or services you have purchased, or about which you have shown interest while browsing on our Site after your registration, or on the basis of the group of customers you belong to (“Profiling”). This means, for example, that if you are a retailer you will receive commercial offers intended for retailers; if you have browsed our Site to search for information on certain services, you will receive offers related to these services; finally, if you are using a service, on the basis of your use of the service you will receive related communications from Register (for example, if the service capacity is reaching the limit, you will be warned and invited to increase the capacity of the service itself, or will be offered complementary services and / or compatible with the one you purchased). This type of analysis is typically performed without the use of cookies on purchase data relating to both individuals and legal entities and the related decisions are not based solely on automated processing. This processing is necessary for the purposes of the legitimate interest of the data controller to customise its commercial suggestions carried out by the Controller, pursuant to art. 6(1)(f) of the GDPR, and on the basis of an assessment on the balance of interests, which led to the conclusions that the legitimate interest of Register is not detrimental to the fundamental rights and freedoms of the Data Subject. You can always object to this processing through the appropriate [“Privacy Notices”](#) form <https://www.register.it/company/segnalazioni-privacy.html?lang=en> or by writing to dpo@register.it, specifying the reasons of your particular situation; moreover, if you are a Facebook user, you may receive personalised promotional messages on your Facebook page (for example, if you have a company and a company page on Facebook, you may see promotional messages from Register on your page that may be in line with your interests) based on Register's use of the targeting features made available by Facebook; for example, Register uses these features to sponsor its posts and promotional content, in order to bring them to the attention of certain segments of Facebook users (e.g., people between 30 and 40 years old interested in IT products and residing in a certain geographical area); this profiling activity is carried out by Facebook, while Register does not have access to personal data in the clear. For more information, you can read the Facebook privacy policy at the following link: <https://www.facebook.com/policy.php>. In the context of these activities, Register is the Data Controller together with Facebook Inc.: the relevant joint controllership agreement is available at the following page https://www.facebook.com/legal/terms/page_controller_addendum.

i. solely for purposes of security and prevention of fraudulent conduct, on the basis of a legitimate interest of Register in preventing fraud and deception to its own detriment or to the detriment of its customers, pursuant to art. 6(1)(f) of the GDPR and on the basis of Recital 47 of the GDPR, which expressly provides that the processing of personal data strictly necessary for the purposes of preventing fraud also constitutes a legitimate interest of the data subject, as well as on the basis of various balances of interests carried out by the Controller which do not show that the processing operations in question are detrimental to the Data Subject’s fundamental rights and freedoms. In particular, such activities shall include:

i. an automated control system, which also makes use of cookies and other similar tracking technologies (as better specified in section 2.f above), to track and analyse certain behaviour of the users on the Site, associated with their IP addresses and other Personal Data associated with the browsing on the Site. The consequence of such processing is that, if a person attempts to engage in fraudulent conduct on Register Site, for example in order to benefit several times from the same promotion without having the right to do so, Register reserves the right to exclude such person from the promotion or to take any other appropriate measure for its own protection.

ii. anti-spam: Register reserves the right to refuse activation or to block email accounts or hosting of its customers from which spamming or phishing activities originate. Where possible, Register will

proceed to verify the identity of the customer in order to carry out the necessary investigations and, only in the event of no response or where false documents are set, will put in place the block. This activity involves the processing of personal data such as e-mail addresses, copy of ID documents, photos and traffic data and finds its legal basis in article 6 (1) (f) and Recitals 47 and 49 of the GDPR, which refer to the legitimate interest of the Controller;

iii. checks on the usage of hosting: if there is an exceptional increase in the disk space used by the customer, the Company – limiting itself to external checks that neither have an impact on the Personal Data of the customer, nor include the identification of the content that has been uploaded – attempts to determine whether there are unlawful uses of the service (both in terms of contractual or regulatory provisions), in order to notify the customer, to protect its rights and to ensure the security of its systems.

iv. a real-time anti-fraud verification system for payments, when a purchase is carried out on the Site: this processing includes the communication of some Personal Data (specifically your name, surname, postal address, IP address, telephone number, e-mail address, bank identification, contents of the cart and user agent information, namely browser and language settings) to MaxMind Inc., a company specialized in anti-fraud services which provides a fraud score to the purchase based on the automated processing of Personal Data disclosed by the Company. The fraud score is elaborated using a machine learning algorithm that formulates a risk assessment; further details on how the algorithm works are available [here](#). If the attributed score exceeds a first threshold, the transaction is accepted but reported internally as "suspicious" and subjected to an internal control by authorized personnel, who may authorize the transaction on a case-by-case basis. Where the score exceeds a second and higher threshold, the transaction is automatically rejected. Both thresholds are manually set by the Company based on a sample of cases ascertained as suspicious or fraudulent. In any case, the Company periodically reviews the formulation of the threshold in order to avoid false positives. Where a transaction is automatically rejected, it is nonetheless verified by authorized personnel of the Company. Furthermore, in this case the user will be provided with means to promptly contact the Company, in order to challenge the decision and express his/her point of view. MaxMind Inc.'s privacy policy is available [here](#).

v. profiling aimed at obscuring some Register's offers to customers who connect from and / or pay from non-EU countries, in particular from countries included in a "Black List" drafted by Register on the basis of anti-fraud analyses. If you cannot access the offers for these reasons, you can always contact Register's support in order to overcome this block.

vi. verification of the identity of Register's customers by requesting photos or other documents suitable for this assessment. This activity is carried out in the following cases: i) where you purchase one or more servers (dedicated or virtual) for the first time, ii) in the event that the Company receives reports relating to violation of industrial or intellectual property rights by third parties, or where such violations are independently detected by Register, iii) the customer is identified as fraudulent by the automatic control system referred to in section 3 (i) (i) above.

l. for the purpose of communication to third parties on the basis of the third party's own legitimate interest pursuant to art. 6 (1) (f) of the Regulation, typically (albeit not exclusively) in the field of domain names, for the purpose of protecting the industrial property rights of the third party or in the case of reports of abuses allegedly committed to the detriment of third parties.

m. display of personalized content and presentation of personalized offers on the Site, by means of the use of profiling cookies and other tracking technologies ("Marketing Automation"). This means, for example, that if you browse our Site to search for information on certain services offered by the

Company, offers relating to those services will be presented to you on the Site.

This activity is carried out through the use of first-party proprietary cookies developed and served by the Company and is based on your consent, expressed by clicking on "Accept" in the cookie banner which is served when you land on the Site. You can withdraw your consent to the use of these cookies at any time by following the instructions provided in section 2.f of this privacy policy, or by managing the cookie settings in your browser.

n. analytics activities by means of tracking through the use of cookies and similar technologies, aimed at verifying and measuring the quality and effectiveness of Register's online advertising campaigns (e.g., how many users who have landed on Register's site and purchased Services actually came from marketing campaigns carried out through Google, Facebook, etc.), in order to improve the performance of those campaigns, as well as the Services offered by Register. The legal basis for this processing activity is the Company's legitimate interest to improve its campaigns and Services, pursuant to art. 6 (1) (f) of the Regulation.

4. Recipients of personal data

For the purposes referred to in Section 3 above, your Personal Data may be shared with:

a.i) persons, companies or professional firms which typically acts as data processors providing Register with advice and consulting in accounting, administrative, legal, tax, financial and debt collection matters related to the provision of the Services; ii) subjects to engage with in order to provide the Services and which typically act as autonomous data controllers (for instance, the national and international Registration Authorities to send the technical and administrative documentation and Maintainer forms to, the authorities that manage the WHOIS database containing the personal data of the domain name assignees or the company Iron Mountain Intellectual Property Management Inc., designated by Icanm as escrow agent, credit card payment service providers (Mercury Payments and Banca Sella), etc.) iii) persons or companies authorised to perform technical maintenance (including maintenance of network equipment and electronic communications networks) and which typically act as data processors; iv) Italian or foreign team.blue Group companies, for administrative and statistical purposes, and which typically act as autonomous data controllers; v) MaxMind Inc., a company specialized in anti-fraud services that acts both as data controller and as data processor on behalf of the Company (collectively "**Recipients**");

b. subjects, bodies or authorities to disclose your Personal Data to in accordance with the provisions of law or under the orders of the authorities (for example, during the course of criminal investigations, Register may receive requests from the judicial authority to provide traffic logs);

c. persons authorized by Register to process the Personal Data required for carrying out activities strictly related to the provision of the Services, who have committed themselves to confidentiality or have an appropriate legal obligation of confidentiality, for example Register's employees;

d. business partners for their own autonomous and separate purposes, only if you have given your specific consent;

e. auditing firms;

f. third parties who request access to domain name registration data on the basis of their own legitimate interest, as better described under paragraph 3.1 of this policy.

The full list of data processors is available by sending a written request to [dpo\(at\)register.it](mailto:dpo(at)register.it).

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5. Transfer of personal data

Some of your Personal Data are shared with Recipients who may be located outside the European Economic Area. Register ensures that your Personal Data are processed by these Recipients in accordance with the GDPR. Indeed, transfers can be based on an adequacy decision or on the Standard Contractual Clauses approved by the European Commission. For further information please send a written request to [dpo\(at\)register.it](mailto:dpo(at)register.it). In the domain name registration services, data are communicated to the subjects listed in section 2 (d) of this policy: in some cases, such processing involves the transfer of data at stake outside the European Economic Area. In these cases the data are transferred on the basis of article 46 and article 49 of the GDPR.

6. Data retention

The Personal Data processed for the purposes referred to in Section 3 (a-b-c) will be retained for the period deemed strictly necessary to fulfil the stated purposes. In any case, since the Personal Data are processed for the provision of the Services, Register will retain the Personal Data for the period allowed by Italian law to protect its interests (art. 2946 et seq. of the Italian Civil Code). In particular, in order for the Company to be able to demonstrate that it has correctly fulfilled its contractual obligations, Register will retain the data necessary for this purpose for the period of time pursuant to Italian law establishing limitations for bringing actions for breaches of contract.

Personal Data processed for the purposes referred to in Section 3 (d) will be retained for the period required by the specific obligation or by applicable law. By way of example, as already specified traffic data will be retained for judicial purposes for six years from their generation; otherwise, they will be retained for six months; invoices will be kept for ten years.

For the purposes referred to in Section 3 (f) (Marketing), your Personal Data may, instead, be processed until you withdraw your consent or until three years after you have ceased to be a Register customer, or if you have only registered to the Site and have not purchased any products or services. Register has, in any case, the possibility to retain your Personal Data for the period allowed by Italian law to protect its interests (art. 2947 (1) (3) of the Italian Civil Code). With specific regard to the Marketing activity indicated in section 3 (f) (i), your data will be deleted from the platform once the e-mail sending activity has taken place. For the purposes referred to in section 3 (h) (Profiling), the retention criteria of your Personal Data are those that govern the processing of data for Marketing purposes. For the purposes referred to in section 3(i)(i) (anti-fraud), the data are kept for the time necessary for the Company to be able to prevent and combat fraudulent conduct carried out through the Site, such as, for example, benefiting from the same promotion several times without being entitled to it. For the purposes referred to in section 3(i)(ii) (anti-spam), the data will be retained for the entire duration of your contractual relationship with the Company.

With regard to traffic data, for six months after its generation, for the purpose of providing the service and for six years for the purpose of ascertaining and prosecuting crimes; for the purposes referred to in section 3(i)(iii) (audits on hosting usage), the data will be retained for the period of time that the customer uses the service. For the purposes referred to in section 3 (i) (vi) (identity verification), Register will process Personal Data up to the time allowed by Italian law to protect its interests (Article 2946 of the Italian Civil Code and subsequent amendments).

For the purposes referred to in section 3 (m) (Marketing Automation), your Personal Data will be processed until your consent is withdrawn or, in any case, if you are a user not registered on the Site, for 14 days or, if you is a registered user, for 2 months.

For the purposes referred to in section 3(n), your Personal Data will be processed for 25 months from the gathering.

Further information on the data retention periods and the criteria adopted in determining these

periods may be requested in writing from the Data Controller or from the DPO.

7. Data subjects' rights

Notwithstanding the obligations or faculties to retain the Data described in paragraph 6 above, you are entitled at any time to request access your Personal Data, to correct, erase or object, under the conditions provided for by Art. 21 of the GDPR, to their processing; you are entitled to request the restriction of their processing in the cases provided for by art. 18 of the GDPR, and to obtain, in a structured and commonly used and machine-readable format, the data regarding you (data portability), in the cases under art. 20 of the GDPR.

Requests are sent in writing from [from here](#) or by sending a written request to dpo(at)register.it. To exercise the right to portability and obtain further information on its content, please open the following link: <https://www.register.it/portabilita-dei-dati/?lang=en>.

It should be noted that, if you request erasure of your Personal Data but you have not withdrawn the previously given your consent for the purposes set out in paragraph 3(g), you may continue to receive any promotional e-mails previously scheduled for the time frame between the deletion of your Data and the technical time of a few hours necessary to update the systems for sending promotional e-mails.

Furthermore, in the case of requests from data subjects regarding the reporting of abuse in the use of the Services or of spamming - activities already prohibited by contract as set out in par. 8 of the [General Conditions of Service](#)- carried out by a Register Customer (it should be noted that such customer typically acts as a data controller pursuant to the GDPR), and in the case of any further requests for the exercise of the rights under art. 15 and ensuing articles of the GDPR, Register, without going into the details of the request, will, on the one hand, promptly inform the customer/data controller and, on the other, provide the data subjects with the details of the customer/data controller.

In any case, you will always be entitled to file a complaint with the competent supervisory authority (the Italian Data Protection Authority), pursuant to art. 77 of the GDPR, if you believe that the processing of your data violates applicable law, as well as to seek judicial redress through the courts (art. 79 of the GDPR).

8. Amendments

This Privacy Policy has been effective since 19/05/2022. Register reserves the right to partly or fully amend or simply update its content, as a result also of changes in applicable law.

If the changes to this policy concern substantial changes in processing activities or may have a significant impact on the data subjects, Register will notify them appropriately and in due time to the data subjects.