Full privacy policy

Disclosure agreement

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

Register.it S.p.A. (hereinafter Register.it), with registered office in Viale della Giovine Italia 17, Florence, CAP 50122, undertakes to constantly protect the privacy on-line of its users. 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 in the awareness of the website sections requiring the entry of such data. Note that the various sections of the web sites of Register.it (hereinafter "Site") requiring entry of your personal data contain specific disclosure options in accordance with art. 13 of the Regulation (EU) 2016/679 (hereinafter: the "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.it, (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.it. In accordance with the provisions of the GDPR, the processing operations carried out by Register. it will comply with the principles of lawfulness, fairness, transparency, purpose and retention limitation, data minimization, accuracy, integrity and confidentiality.

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1. Data Controller and Data Protection Officer

The Controller of the processing operations carried out through the Site is Register.it as specified above. The Data Controller's organization comprises a Data Protection Officer (**DPO**). The DPO is available for any information regarding the processing of the personal data of Register.it, including the list of data processors. It is possible to contact the DPO by writing to dpo(at)dada.eu

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 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.it 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.it 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.it 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.it and also have a Facebook profile, you can choose to associate your Register.it account to your Facebook account by clicking on "Login with Facebook" and then on "Associate Account": this way, your Register.it 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.it control panel without entering any credentials. In the same way, Register.it gives you the possibility of associating your Register.it account to any

Google, Twitter and LinkedIn accounts. In such cases too, these social media sites will automatically

send Register.it 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.it 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.it against any complaints, claims and demands for compensation for damages arising from processing, etc., that may be received by Register.it 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.it 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.it 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.it 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.it, 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.it 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.it 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.it 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.it 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. it against any complaints, claims and demands for compensation for damages arising from processing, etc., that may be received by Register.it 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 provide 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. it 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.it, 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.it, insofar as it concerns it and as part of its provision of domain names, shall not publish your personal data.

e. Traffic data

As part of the e-mail service, Register.it 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.it 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.it for the purpose of ascertaining and prosecuting crime for six years after their collection. Additionally, the data are processed by Register.it 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. Cookies Definitions, characteristics, and application of standards

Cookies are small text files that sites visited by the user send and register on your computer or mobile device, to then be re-sent to the same sites when they are visited again. It is thanks to these cookies that the site remembers the actions and preferences of the user (for example login data, selected language, dimensions of font, other display settings etc.) so that they do not need to be specified a second time when the user returns to the site or browses another page of the same site. The cookies are therefore used for electronic authentication, the monitoring of sessions and storage of information regarding the activities of users accessing a site, and may also contain a unique ID code that enables a system to track the browsing activities of a user within the site itself, for statistical or advertising purposes. When browsing a site, the user may also receive, on his/her computer or mobile device, cookies from sites or web servers other than the site being visited (i.e. third party cookies). Some operations may not be able to be performed without the use of cookies, which in certain cases are technically necessary for operation of the site. There are various types of cookie, depending on their characteristics and functions, and these may remain stored on the user's computer or mobile device for different periods of time: the so-called session cookies, which are automatically deleted on closure of the browser; the so-called persistent cookies, which remain on the user's device through to a pre-set expiry.

According to current Italian legislation, express consent by the user is not always required from the user to use cookies. In particular, "technical cookies" do not require this consent. These are cookies used exclusively to transmit communication messages on an electronic communication network, or those strictly necessary to provide a service specifically requested by the user. In other words, these are cookies that are indispensable for operation of the site or required to perform activities requested by the user.

In the case of technical cookies, which do not require express consent for their use, the Italian Data Protection Authority (see Provision Identification of simplified methods for information consent and the acquisition of consent for the use of cookies of 8 May 2014, hereinafter referred to as "Provision") also includes:

"analytics cookie" where used directly by the site manager to collect information, in aggregate form, on the number of users and how the latter visit the site itself;

browsing or session cookies (for login);

function cookies, which enable the user to browse a site according to a selected set of criteria (for example language, products selected for purchase) for the purposes of improving the service provided to the user.

On the contrary, "profiling cookies", i.e. those used to create user profiles and used to send advertising messages in line with the preferences outlined by the user while browsing on the network, required specific consent from the user.

Types of cookie used by the site and option of (de)-selection (cookies - or links to the information policies of the third parties that send cookies - marked with an asterisk refer to the website

www.simply.com)

The Site uses the following cookies that can be deselected as required, with the exception of third party cookies, in which case the user should refer directly to the selection and deselection modes of the respective cookies, indicated via the links:

Technical browsing or session cookies strictly necessary for operation of the Site or to enable the user to use the contents and services requested by the latter.

Analytics cookies, which enable the system to understand how the site is used by the users. In the case of these cookies, no information on the user ID is collected, or any personal data. The information is processed in aggregate and anonymous form.

Function cookies, i.e. cookies used to activate specific site functions and a selected set of criteria (for example language, products selected for purchase) for the purposes of improving the service provided to the user.

Profiling cookies used to send advertising messages in line with the preferences shown by the user within the online browsing environment.

CAUTION: deleting the technical and/or function cookies of the Site could make it impossible to browse or render unavailable certain services or functions of the Site, causing some malfunctions, in which case the user would be obliged to modify or manually enter some information or preferences each time he/she visits the Site.

Third party cookies, i.e. cookies of sites or web serves other than that of Register.it, used for specific purposes of the said third parties, including profiling cookies. Note that these subjects, listed below with the relative links to their privacy policies, are independent Controllers of the data collection and handling processes via cookies; you must therefore refer to their personal data handling policies, information policies and consent forms (selection and deselection of respective cookies) as specified in the aforementioned Provision. To complete this it must be noted that Register.it makes the utmost effort to track cookies on its own Site. These are updated regularly on the table below, where we ensure transparency of the cookies sent directly by Register.it and the purposes of these procedures. As concerns these cookies, we provide the links to the information policies of the third parties that send them via our Site: we assign these third parties, as noted above, with the responsibility of supplying the information policy and collecting consent from the users, as envisaged in the Provision. This responsibility refers not only to the cookies sent directly by the third parties but also any additional cookies sent via our Site based on the use of the services used by the third parties themselves. In fact, with regard to these cookies, sent by the suppliers of services of the aforementioned third parties, Register.it cannot exercise any right of control and cannot be aware of either the characteristics or purposes of these.

The following section lists the links to the information on third party cookies:

<u>Adform</u>

Zopim

Optimizely

<u>Google</u>

<u>Facebook</u>

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• <u>Open-Xchange</u>

In detail, the cookies sent from Register via their own Site are specified below:

Cookies present on the Site

Type of cookies and Controller	Technical name of cookies	Function and purpose	Persistence time
REGISTER.IT • first-party Technical	orderCodeCK	This cookie is used to store the ID code of the order during a purchaser - it enables the system to retrieve the information on the entire contents of a basket in the event of problems.	At the end of a session (closure of browser /2h inactivity)
REGISTER.IT • first-party Technical	dpsid	This cookie is used to store the unique ID of the current session. This cookie is essential for correct operation of the site (including cart).	At the end of a session (closure of browser /2h inactivity)
REGISTER.IT • first-party Technical	USERLOGGED	This cookie contains the BILLING name and surname, i.e. the ID code of the user. It is used to be able to identify the user if this is required to provide the service.	At the end of a session (closure of browser /2h inactivity)
REGISTER.IT • first-party Technical	USERID	This cookie contains the ID code of the user on the STORE platform. It is used to be able to identify the user if this is required to provide the service. Unlike the previous cookie, it does not contain the name and surname of the user.	At the end of a session (closure of browser /2h inactivity).
REGISTER.IT • first-party Technical	renewItems	This cookie indicates the number of products used by the client and in expiry within the next 30 days. It is used to send users an automatic alert in the header of the page during login.	At the end of a session (closure of browser /2h inactivity)
REGISTER.IT • first-party Technical	fmconfig	This cookie serves to the provide the fileManager service used by the user. It enables memorisation of the hosting platform and sorting of the files to be displayed.	20 days
REGISTER.IT	newsTooltipShow	Used for the management of Tooltips (client messaging system). This	6 years

• first-party Technical		is used to communicate with the client with the display of messages on the page, notifications of new page functions and services. It is not strictly necessary, but useful to improve services and user experience.	
REGISTER.IT • first-party Technical	gb_cp_*	This cookie stores the sidebar display preferences (a part of the control panel containing the lists of products purchased and/or of the clients).	1 year
PEC-EMAIL.COM • first-party Technical	PHPSESSID	This cookie is used to store the unique ID of the current session. This cookie is essential for correct operation of the site.	At the end of a session (closure of browser /2h inactivity)
PEC-EMAIL.COM • first-party Technical	atmail6	This cookie is used to store the unique ID of the current session. This cookie is essential for correct operation of the site.	At the end of a session (closure of browser /2h inactivity)
PEC-EMAIL.COM first-party Technical	pennyblack	Cookies that maintain the last username entered on login when accessing from a mobile phone.	At the end of a session (closure of browser /2h inactivity)
WEBMAI.REGISTER.IT • first-party Technical	atmail6	This cookie is used to store the unique ID of the current session. This cookie is essential for correct operation of the site	At the end of a session (closure of browser /2h inactivity)
.REGISTER.IT • first-party Technical	cplsLogged	These cookies serve to recognise the status of the user login and are required to ensure the correct display of certain personal information (the cookie itself does not contain any personal information).	At the end of a session (closure of browser /2h inactivity)
.REGISTER.IT • first-party Technical	cpLanguage	This cookie serves to maintain the presentation of site contents in the language selected by the user.	6 years
.REGISTER.IT • first-party Technical	cc_cookie_accept	Cookie that memorises the acceptance of profiling cookies (also by third parties) by the browser user	6 years
.REGISTER.IT • first-party Technical	cc_cookie_decline	Cookie that memorises the refusal of profiling cookies (also by third parties) by the browser user	6 years
SEARCH.REGISTER.IT • first-party Technical	laravel_session	This cookie serves to maintain the session on the search system	2h

.REGISTER.IT	ashkii		At the end of a
• first-party		Counter of current browsing step and session referrer.	session (closure of 2h
Profiling			inactivity)
.REGISTER.IT			
• first-party	_wicasa	First session referrer code.	90 days
Profiling			
.REGISTER.IT			
• first-party	cookid	Unique session ID.	90 days
Profiling			
.REGISTER.IT			At the end of a
• first-party	dbmFP	Session referrer code.	session (closure of browser /2h
Profiling			inactivity)
.REGISTER.IT			
• first-party	dbmPK	Counter of current browsing step and first session referrer	90 days
Profiling			
.REGISTER.IT			
• first-party	trkid	Cookies to store selection regarding privacy cookies.	At the end of a session (closure of
Profil ing			browser /2h inactivity)
Profil	trkid	Cookies to store selection regarding privacy cookies.	browser /

Cookie settings

Here the user can make selections regarding the reception of profiling cookies. Failure to authorise the specified cookies (profiling) will not affect operation of the site. The user can block or delete (all or part) technical and function cookies via the specific functions in the browser used. However, the user should note that failure to authorise technical cookies may render the site unusable, without the possibility of viewing contents and using the relative services. Disabling the function cookies of the Site could render unavailable certain services or functions of the Site, or cause malfunctions, in which case the user would be obliged to modify or manually enter some information or preferences each time he/she visits the Site. The user selections regarding site cookies will in turn be registered in a specific cookie. However, this cookie could in some situations not function correctly: in these cases we recommend that the

user deletes unwanted cookies and disables use also via the functions in the browser used.

The user's cookie preferences will be reset if different browsers are used to access the Site.

Profiling cookies

Profiling cookies are used to send advertising messages in line with the preferences shown by the

user within the online browsing environment.

Enabled

Disabled

How to view and modify cookies via your browser

You can select which first-party cookies to authorise via the relative procedure set up in this page,

and can also authorise, block or delete (totally or in part) the cookies via the specific functions in

your browser.

For more information on how to set the preferences for cookies via your browser, refer to the

following instructions:

Internet Explorer

- <u>Firefox</u>
- <u>Chrome</u>

3. Purposes 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 <u>Register.it</u> websites;

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 or through the appropriate "Privacy Notices" form at https://www.register.it/company/segnalazioni-privacy.html?lang=en. For answers to telephone requests for assistance received by Register.it, we inform you that the calls may be registered so that Register.it can prove it has properly handled requests.

d. to discharge legal, accounting and tax 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, to pursue Register.it's legitimate interests to promote products and services which you may be reasonably interested in;

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.it on social media;

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 Dada Group and/or its affiliates and/or subsidiaries and/or other business partners and outsourcers who act as independent data controllers;

h. to make personalised commercial proposals based on the products or services you have purchased, or about which you have shown interest while browsing on our Site, 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 targeted communications from Register.it (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 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

<u>Safari</u>

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data controller to customize its commercial proposals. You can always object to this processing through the appropriate "Privacy Notices" form at https://www.register.it/company/segnalazioni-privacy.html?lang=en;

i. solely for purposes of security and prevention of fraudulent conduct, the Data Controller puts an automated control system in place to track and analyze user's behaviour on the Site, associated with the processing of Personal Data such as, among which, the IP address. The consequence of such processing is that, if a person attempts to engage in fraudulent conduct on Register.it Site, for example in order to benefit several times from the same promotion without having the right to do so, Register.it reserves the right to exclude such person from the promotion or to take any other appropriate measure for its own protection.

4.Legal basis and mandatory or optional nature of the processing

The legal basis of the processing of Personal Data for the purposes referred to in section 3 (a-b-c) is art. 6 (1) (b) of the GDPR, since processing operations are required in order to provide the services as per contract. The provision of Personal Data for these purposes is optional, however, failure to provide them would imply the inability to initiate the requested Services.

The purpose referred to in Section 3 (d) constitutes a lawful processing of Personal Data pursuant to art. 6 (1) (c) of the GDPR. Once Personal Data are provided, the processing may indeed be required to comply with legal obligations Register.it my be subject to.

Processing operations carried out for the marketing purposes described under section 3 (f) and for disclosing to third parties described under section 3 (g) are based on the granting of your consent pursuant to art. 6 (1) (a) of the GDPR. The provision of your Personal Data for these purposes is entirely optional and does not affect your use of the Services. The processing activities under section 3 (e) performed for the purposes of e-mail marketing on products or services similar to those purchased by you, find instead its legal basis, pursuant to art. 6.1.f of the GDPR, in the legitimate interest of Register.it to promote its products or services in a context in which the data subject can reasonably expect this type of processing, and which s/he can oppose at any time. Indeed, if you refuse to have your data processed for marketing purposes pursuant to section 3(e) and 3(f), you can at any time do so via your control panel, by sending a request at

https://www.register.it/company/segnalazioni-privacy.html?lang=en or through the link at the bottom of the e-mail. The profiling processing referred to in section 3 (h) is based on the legitimate interest of the Data Controller, pursuant to art. 6.1.f. of the GDPR, to personalise its commercial communication. The processing referred to in section 3 (i) is grounded as well in the legitimate interest of the Data Controller to detect fraud and scams committed against it in accordance with art. 6(1)(f) of the GDPR.

5. Recipients of personal data

For the purposes referred to in Section 3 above, your Personal Data may be shared with: a. subjects typically acting as data processors, namely: i) persons, companies or professional firms providing Register.it 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 (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, credit card payment service providers, (Mercury Payments and Banca Sella), etc.) iii) persons authorised to perform technical maintenance (including maintenance of network equipment and electronic communications networks); iv) Italian or foreign Dada Group companies for administrative and statistical purposes (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.it may receive requests from the judicial authority to provide traffic logs);
c. persons authorized by Register.it 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.it's employees;
d. business partners for their own autonomous and separate purposes, only if you have given your specific consent.

The full list of data processors is available by sending a written request at.

6. Transfer of personal data

Some of your Personal Data are shared with Recipients who may be located outside the European Economic Area. Register.it 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. Further information is available from the Data Controller. In the domain name registration services, data are communicated to the subjects listed in section 2 (e) of this policy: in some cases such processing involves the transfer of data at stake outside the European Economic Area. As this transfer is necessary for your use of the service, it is justified under art. 49(1)(b) of the GDPR, according to the current privacy law.

7. 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 fulfill such purposes. In any case, since the Personal Data are processed for the provision of the Services, Register.it will retain the Personal Data for the period allowed by Italian law to protect its interests (art. 2946 and ensuing articles of the Italian Civil Code). The 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.

For the purposes referred to in Section 3 (e) (f), your Personal Data may, instead, be processed until you withdraw your consent or until three years after you have ceased to be a Register.it customer, or have only registered to the Site and have not made any purchase of products or services. Register.it has, in any case, the possibility of retaining your Personal Data for the period allowed by Italian law to protect its interests (art. 2947 (1) (3) of the Italian Civil Code). Further information on the data retention period and the criteria adopted in determining this period may be requested in writing from the Data Controller or to the DPO.

8. Data subjects' rights

You are entitled to request Register.it at any time to access your Personal Data, correct, erase or object to their processing in the cases provided for by art. 20 of the GDPR; you are entitled to request the processing limitation in the cases under art. 18 of the GDPR, and to obtain, in a structured and

commonly used and machine-readable format, the data regarding you (portability), in the cases under art. 20 of the GDPR.

Requests are sent in writing from <u>here</u>. To exercise the right to portability and obtain further information on its content, please open the following <u>link</u>.

It should be noted that, 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.it 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.it, 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.

9. Amendments

This Privacy Policy has been effective since May the 9th 2018. Register.it reserves the right to partly or fully amend or simply update its content, as a result also of changes in applicable law.

For the previous version from April the 3rd 2018 to May 9th 2018 please click here