

## PRIVACY 2024



As of May 25, 2018, the new General Data Protection Regulation (REG. EU 679/2016) came into effect. The GDPR further strengthens your rights regarding data protection. A key part of this regulation involves increasing transparency in how personal data is handled.

In this context, we at 1B srl (hereinafter referred to as "SBLIND") have updated our data protection policy.

As part of the improvement process imposed by the new regulation, we have clarified how we manage our users' personal data to prevent any possible misunderstandings or unclear interpretations of data processing.

In relation to the new regulation, we provide, for clarity and transparency, how SBLIND may use the data entered by its users:

**THE COMPANY 1B SRL, OWNER OF THE SBLIND BRAND, INFORMS ALL ITS USERS THAT THE DATA ENTERED DURING REGISTRATION WILL BE PROCESSED IN COMPLIANCE WITH THE CURRENT LEGISLATION AND, AS A STRATEGIC BUSINESS CHOICE, WILL NOT BE SOLD OR TRANSFERRED TO THIRD PARTIES AND WILL NOT BE USED FOR COMMERCIAL PURPOSES.**

Such data will be used exclusively in the interest of the user and, if necessary, may be communicated to competent authorities for security-related functions and compliance with the law.

We emphasize that it is our choice to protect and not disclose user data to third parties to avoid contributing to the dissemination and circulation of personal information.

**We consider this practice to be a "problem" that 1B srl does not want to foster. Instead, the protection of the digital identity of our users is at the heart of our project. The indiscriminate circulation of data that invades our privacy and compromises it on a daily basis cannot be considered "normal."**

During the registration process on the platform, only the user's first and last name, email address, and registration location will be required.

1. For business profiles, both BASIC and PREMIUM, the data necessary to carry out the payment procedures will be entered which will take place directly in the app and which will be managed by third-party operators.
  - These details will be managed, stored, and used exclusively by 1B srl (owner of the SBLIND brand) in the user's interest, to provide services and information for using the platform.
  - They may be used for information-related activities only by 1B srl and will not be transferred, sold, or communicated to third parties.

- During the purchase of paid packages, payment data may be requested and communicated to the relevant financial institutions.
- Content uploaded to the platform is managed and stored on servers owned by Aruba Spa and AWS. Such content will not be stored but will be retained for the necessary time for sharing. Once this period has passed, Sblind will delete/destroy the content. This period can be modified and managed autonomously by Sblind.

This update clarifies to Sblind users that our interest is to use the data provided exclusively to benefit them. 1B srl does not want, nor does it deem useful, the exploitation of sensitive data. SBLIND's business model is based on faster, more immediate, and less invasive sharing of information/content, minimizing data input.

The philosophy that has guided Sblind's creation draws a path toward a completely non-invasive use of sensitive data. For example, any user, using the Sblind app, can view content uploaded simply by being at a particular place at a particular time, without entering any personal data. Completely anonymously. Sblind is designed to share content based on proximity, not on individual/user data.

It is important to note that the platform does not contain algorithms that map behaviors and digital actions. We defend the right to consult and use a sharing platform without having our behaviors mapped, clustered, analyzed, and sold, thereby creating profiles that can be sold to third parties. Sblind does not adopt this practice in any way.

FOR ANY FURTHER QUESTIONS/CLARIFICATIONS ABOUT DATA PROCESSING, DO NOT HESITATE TO CONTACT US AT:

[info@sblind.com](mailto:info@sblind.com) — we will be happy to clarify any doubts.

## **COOKIE POLICY AND MANAGEMENT**

Pursuant to Article 13 of Legislative Decree 196/03 "Personal Data Protection Code," we inform you that the personal data you provide or otherwise acquire in the course of professional services requested or offered to 1B srl will be processed in compliance with the principles of fairness, lawfulness, and transparency. 1B srl, as the Data Controller, guarantees that the processing will fully protect your privacy and rights.

Data processing involves the collection, registration, organization, storage, modification, selection, extraction, use, connection, blocking, communication, dissemination, deletion, and destruction of data, including if not registered in databases.

### Purpose and Methods of Processing

In general, the processing of this data is necessary to:

- Pursue business objectives and exercise control over them.
- Ensure the efficiency of 1B srl's processes (the company that controls the Sblind brand).

Specifically:

- Personal data and, where necessary, sensitive data of the employees of the CLIENT COMPANY will be processed for:
  - Planning and managing the contract in place and the associated obligations.
  - Allowing Sblind to communicate and interface effectively with the USER.
- Marketing and commercial activities, including sending newsletters, with the prior consent of the interested party. This activity only concerns SBLIND and 1B srl.

- Registered users' data will not be communicated, delivered, or transferred to third parties.

Processing of personal data of suppliers operating on behalf of 1B srl involves:

- Planning and managing services and obligations defined within existing work agreements.

The processing will be carried out using tools designed to ensure the security and confidentiality of the data and will also be conducted using electronic means suitable for storing, managing, and transmitting the data.

Data Retention Duration

The information collected will be stored in company archives for at least 10 years and in any case according to the terms of the law. However, if the interested party believes the purpose of the processing has been exhausted for any reason, they must provide written notice to the 1B srl headquarters, which will immediately delete the information, unless contrary to legal provisions.

## **DATA DELETION**

Upon the user's/concerned party's express request, 1B srl will delete the entered data. At any time, you can send an email to [1b@pec.it](mailto:1b@pec.it).

Alternatively, the user can access their profile page, scroll to the bottom, and click on the "Delete Account" button, prominently displayed in the center. This action will delete the account, as well as all entered data and uploaded content. It will not be possible for either the interested party or 1B srl to recover this data.

Unless otherwise indicated at registration, the content uploaded will always be deleted 30 days after its publication. The system, with programmed automation, will permanently delete the content from the platform and servers at 24:00 on the thirtieth day.

## **Business Profiles**

Business profiles will be treated in the same way, with the only differences being the timing of storage and publication of content.

There are different durations for business profiles, 60 days for content uploaded from the basic business profile and 120 days for content uploaded from premium business profiles.

After this period, all contents, files, videos, images will be permanently deleted from the servers of 1B srl.

## **SHARING, COMMUNICATION, AND SCOPE OF DISSEMINATION OF YOUR PERSONAL DATA**

The provided data will be processed by personnel duly appointed to handle it, operating under the supervision of administrators.

Data dissemination will only occur to fulfill legal obligations, or with your explicit consent. Data may be communicated to credit institutions for payment management only in the case of paid package purchases.

## **USER RIGHTS**

The processing of data, essential for the proper management of commissioned services, can be performed with the help of electronic or automated tools. Continuing with the translation:

The processing of data may consist of any operation or series of operations among those listed in Article 4, paragraph 1, letter a) of the aforementioned Legislative Decree.

We remind you that providing your data is optional; however, failure to provide all or part of your personal data may result in the partial or complete inability to provide the agreed services.

In relation to the aforementioned processing, you may exercise your rights under Article 7 of the Personal Data Protection Code, which is presented below:

#### Article 7 " –Right of Access to Personal Data and Other Rights"

1. The data subject has the right to obtain confirmation of the existence or non-existence of personal data concerning them, even if not yet recorded, and to have such data communicated in an intelligible form.
2. The data subject has the right to obtain information about:
  - The origin of the personal data;
  - The purposes and methods of the processing;
  - The logic applied when processing is carried out with the help of electronic tools;
  - The identifying details of the data controller, data processors, and the designated representative pursuant to Article 5, paragraph 2;
  - The entities or categories of entities to whom the personal data may be communicated or who may become aware of the data in their capacity as designated representative within the State's territory, as data processors, or as persons in charge of the processing.
3. The data subject has the right to obtain:
  - The updating, rectification, or, when interested, the integration of the data;
  - The deletion, anonymization, or blocking of data that have been processed unlawfully, including data that do not need to be kept for the purposes for which the data were collected or subsequently processed;
  - The certification that the operations referred to in points (a) and (b) have been made known, also with regard to their content, to the entities to whom the data were communicated or disseminated, unless this requirement proves impossible or involves the use of means that are clearly disproportionate to the right protected.
4. The data subject has the right to object, in whole or in part:
  - On legitimate grounds, to the processing of personal data concerning them, even if relevant to the purpose of the collection;
  - To the processing of personal data concerning them for the purpose of sending advertising or direct sales material, or for carrying out market research or commercial communication.

To exercise the rights granted to you by Article 7 of the Code, you may contact the data controller in writing or verbally, with a minimum interval of 90 days between requests.

If the request is made verbally, it can only address:

- The origin of the personal data, the location, and the method of collection;
- The purposes and methods of processing;
- The method and logic of processing with electronic/information/telecommunication tools;
- The identifying details of the data controller and the data processor;
- The entities or categories of entities to whom the personal data may be communicated or who may become aware of the data.

If the request is made in writing, it must be sent by registered mail with return receipt, fax, or email to the legal office of the data controller: 1B srl, Via Zelasco, 1 – 24121 – Italy – [info@sblind.com](mailto:info@sblind.com).

It is also possible to request a "CERTIFICATE OF ATTESTATION" to certify that the requests made have been properly addressed and communicated to those to whom the data had been previously disclosed.

As an interested party, you may also delegate a third party by providing a signed power of attorney or delegation in the presence of an authorized representative, or provide a signed copy along with a non-certified copy of the data subject's identification document. If your request is submitted on behalf of a legal entity, it must be submitted by the authorized person in accordance with the entity's statutes or regulations.

You can also request information on behalf of a deceased person if you can demonstrate a personal interest, or act in the interest of the deceased or for legitimate family reasons deserving of protection. The data controller must respond to the request within 15 days of receipt or within 30 days in the event that a response is problematic, with written notification of the reasons for the delay provided by the 15th day.

## COOKIES

(Summary of technical cookies, possibly integrated with non-technical cookie descriptions and specific purposes)

The website [www.sblind.com](http://www.sblind.com), in compliance with current regulations, is not required to request consent for technical and analytics cookies.

### What are Cookies?

Cookies are small text files used to store preferences, data, and information about the browsing and use of the website you are visiting. They are necessary to display the site correctly (technical cookies) or to collect (in a completely anonymous way) user behavior on the site, with the goal of making the site more functional for visitors (analytics cookies).

### Persistent Cookies

These cookies are not deleted when the browser is closed but remain until a pre-set expiration date.

### Session Cookies

These cookies are deleted each time the browser is closed.

### How to Disable the Use of Cookies

Cookies can be blocked or disabled by following these simple steps ([link to an external website](#)). Be aware that these solutions may prevent the user from using or viewing parts of the website.

## THIRD-PARTY WEBSITES AND SERVICES

[www.sblind.com](http://www.sblind.com) may contain links to other websites that have their own privacy policies, which may differ from those adopted by 1B srl. Such links are marked with the notation "link to an external site" or an icon. The owner of the website [www.sblind.com](http://www.sblind.com) is not responsible for the privacy policies of these sites or for any damage these sites may cause to the user.

### Social Media Cookies

When visiting a website, users may receive cookies both from the visited site ("first-party cookies") and from websites managed by other organizations ("third-party cookies"). A notable example is the presence of "social plugins" for Facebook, Twitter, Google+, and LinkedIn. These plugins are generated directly by the aforementioned websites and integrated into the page of the host site. The most common use of social plugins is to share content on social networks.

The presence of these plugins involves the transmission of cookies to and from all websites managed by third parties. The management of information collected by "third parties" is governed by their respective privacy policies. To ensure greater transparency and convenience, the web addresses of the various policies and methods for managing cookies are listed below:

- Facebook Privacy Policy:

[<https://www.facebook.com/help/cookies/>](<https://www.facebook.com/help/cookies/>)

- Facebook Settings: Access your account, go to the privacy section.

- LinkedIn Privacy Policy: [<https://www.linkedin.com/legal/cookie-policy>](<https://www.linkedin.com/legal/cookie-policy>)
- LinkedIn Settings: [<https://www.linkedin.com/settings/>](<https://www.linkedin.com/settings/>)
- Google+ Privacy Policy: [<http://www.google.it/intl/it/policies/technologies/cookies/>](<http://www.google.it/intl/it/policies/technologies/cookies/>)
- Google+ Settings: [<http://www.google.it/intl/it/policies/technologies/managing/>](<http://www.google.it/intl/it/policies/technologies/managing/>)

## Google Analytics Plugin

The website [www.sblind.com](http://www.sblind.com) includes some components transmitted by Google Analytics, a web traffic analysis service provided by Google, Inc. ("Google"). These are third-party cookies collected and managed anonymously to monitor and improve the performance of the host site (performance cookies). Google Analytics uses cookies to collect and analyze anonymously the behaviors of the users of the website [www.sblind.com](http://www.sblind.com) (including the user's IP address). These data are collected by Google Analytics, which processes them to produce reports for 1B srl regarding the activities on its website.

This website does not use (and does not allow third parties to use) Google Analytics tools to track or collect personally identifiable information. Google does not associate your IP address with any other data held by Google, nor does it attempt to link an IP address to the identity of a user. Google may also disclose this information to third parties where required by law or where such third parties process the information on Google's behalf.

For more information, refer to the following link:

- [Google Privacy & Terms](<https://www.google.it/policies/privacy/partners/>)

You can selectively disable Google Analytics by installing the opt-out component provided by Google. To disable Google Analytics, refer to the following link:

- [Google Analytics Opt-Out](<https://tools.google.com/dlpage/gaoptout>)

The company 1B SRL and its administrators are always available for any doubts, requests, or clarifications at the email address: **[info@sblind.com](mailto:info@sblind.com)**

**September 2024**