YOUR PRIVACY IS IMPORTANT TO US!

In light of the regulations on the processing of personal data, in particular the European Regulation 2016/679 (hereinafter also "GDPR") and the Legislative Decree 196/2003, as amended by the Legislative Decree 101/2018, with these privacy and cookie policies we want to provide you with some useful information to explain how we will process the personal data you provide when you visit the website "rozes.ai" (hereinafter also "Website").

We would like to point out that this policy only applies to this Website and not to third-party websites that may be reached through links on the Website. Furthermore, this policy may be subject to periodic updates or changes, which will be published on the Website.

When consulting the policy, it is important to keep in mind that **personal data** means any information concerning an identified or identifiable natural person (hereinafter also "**Data Subject**"); an identifiable person is one who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural, or social identity.

The Data Controller

Data controller means the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

The **Data Controller** for the data collected through this Website is **Rozes S.r.l.**, represented by its current legal representative, with registered office at via Giovanni Battista Tiepolo 67/A, 35129 – Padova, tax code and VAT number 04678820236 (hereinafter also "**Data Controller**").

For any information regarding the processing of your personal data, you can write to the **email** address privacy@rozes.it

The Data Protection Officer ("**DPO**") appointed by the Data Controller pursuant to Articles 37 et seq. of the GDPR can be contacted by sending an email to the address dpo@rblex.it.

Data Collected, Purposes and Legal Basis for the Processing, Nature of the Data Provision

When you visit the Website, several types of data are processed:

Automatically Collected Data

Browsing Data

When you visit our Website, our servers temporarily store each access in a log file. Specifically, technical data such as the IP address of the requesting computer, the name of the owner of the IP address range, the date and time of access, the website from which the access was made (Referer URL), including the search term used – if applicable – the name and URL of the retrieved files, the status code, the operating system of your computer, the browser you used, and the transmission protocol used are stored until they are automatically deleted after a maximum of 2 years.

The processing of these data allows you to use the Website and allows us to guarantee the security and stability of the system, and to obtain anonymous statistical information. Furthermore, these data could be used to ascertain responsibility in the event of computer crimes committed against our Website, attacks on the network infrastructure, or other unauthorised or abusive use of our Website.

The provision of these data is mandatory for browsing the Website and the legal basis for this type of processing is our legitimate interest pursuant to Article 6(1)(f) GDPR.

Cookies or Similar Technologies

Cookies are small files that your browser automatically stores on your computer when you visit our Website.

Our Website only uses technical cookies and the like. By clicking here, you can view the extended cookie policy.

The legal basis for the data processing carried out through the installation of technical cookies is our legitimate interest, pursuant to Article 6(1)(f) GDPR, to ensure the functionality of the Website. In the case of installation of cookies other than technical cookies, the processing will be based on your consent, provided through the cookie banner.

Social buttons

The Data Controller uses the so-called "social buttons".

Social buttons are direct links to the social network platforms used by the Data Controller. Clicking on the links will allow you to access the related pages.

Said social network platforms act as independent data controllers. More information on the privacy policies of the social network platforms and on how to manage and disable their cookies can be found on the social network platforms.

Data provided by you, as users

"Request a demo" form

The Website contains a form that allows you to request a demo of our services. To do so, you will need to enter mandatory data such as your name, surname, telephone number, email address and company name for which the demo is requested, as well as a text message.

"Contacts" form

The Website also includes a form that allows you to contact Rozes. This form requires you to enter certain mandatory information, such as your name, surname, telephone number, email address and the name of the company you represent, as well as a text message.

Providing data through the "Request a demo" and "Contacts" forms is optional, but necessary to use the respective options. Therefore, refusing to provide all or part of the data will prevent you from requesting a demo or contacting Rozes, depending on the case.

The legal basis for this data processing is the necessity to take pre-contractual measures at the request of the data subject, in accordance with Article 6(1)(b) of the GDPR.

We inform you that we may also process the data you provide to prevent abuse and fraud, to establish, exercise or defend a legal claim of the Data Controller, and to transmit data to bodies and public authorities, in compliance with legal and regulatory provisions. In these cases, the legal basis for the processing is the legitimate interest of the Data Controller and the fulfilment of legal obligations, in accordance with Article 6(1)(c) and (f) of the GDPR.

Data Retention Methods and Period

Personal data will be stored mainly in electronic form, using specific security measures to prevent any data breach, such as data loss, unlawful or incorrect use, and unauthorised access. However, due to the nature of online transmission, these measures cannot completely limit or exclude any risk of data loss or unauthorised access. To this end, it is advisable to periodically check that you have adequate software devices to protect data transmission over the network, both incoming and outgoing (such as updated antivirus systems) and that your Internet service provider has adopted appropriate measures for the security of data transmission over the network (such as firewalls and anti-spam filters). Rozes employees and contractors who come into contact with your personal data have been duly authorised to do so and are required to maintain confidentiality and to comply with data protection regulations.

Regarding data retention, browsing data will be stored for a maximum period of 2 years. You can find more information about cookie retention periods in the dedicated cookie policy.

Personal data provided through the "Request a demo" and "Contacts" forms will be stored for the time necessary to process the request. If, in the meantime, further processing purposes should emerge, the Data Controller will provide further information accordingly.

If the processing becomes necessary to pursue further legitimate interest of the Data Controller (e.g. to prevent abuse and fraud, to establish, exercise or defend a legal claim) or to comply with legal obligations, the retention period will vary depending on the applicable legislation.

Subsequently, once the aforementioned reasons for processing no longer apply, the data will be deleted, destroyed, or stored anonymously.

Data Transfer outside the EEA

Except as further specified in the cookie policy, we inform you that personal data are stored on servers located within the European Union. Any transfer of data outside the European Union or to an international organisation will take place in accordance with applicable laws, in particular the provisions contained in Chapter V of the GDPR. In this case, the Data Controller will provide you with any further information regarding the conditions on which the transfer is based.

Your Rights

For a better understanding of your rights under the law regarding the processing of personal data, we invite you to consult in full Articles 15 and following of the GDPR. For your convenience, we have provided an excerpt of these provisions below.

- **Right of access** (Article 15 GDPR): you can request confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and further information about the processing.
- Right to rectification (Article 16 GDPR): you can request that the data you have provided, or otherwise held by the Data Controller, be corrected, or completed if they are inaccurate or incomplete.

- Right to erasure ("right to be forgotten") (Article 17 GDPR): you can request that the data collected or processed by the Data Controller be deleted without undue delay, if (i) they are no longer necessary for the purposes for which they were collected, (ii) the consent has been withdrawn and there is no other legal basis for the processing, (iii) the data subject has objected to the processing, (iv) the data have been unlawfully processed, or (v) there is a legal obligation to erase the data.
- Right to restriction of processing (Article 18 GDPR): you have the right to obtain restriction of processing of your personal data where one of the following applies: (i) you contest the accuracy of the personal data, for a period enabling the Data Controller to verify the accuracy of the data; (ii) the processing is unlawful and you oppose the erasure of the personal data, requesting instead the restriction of their use; (iii) the Data Controller no longer needs the personal data for the purposes of the processing, but the data are required by you for the establishment, exercise or defence of legal claims; (iv) you have objected to processing pursuant to Article 21(1) of the GDPR, pending the verification whether the legitimate grounds of the Data Controller override those of the data subject.
- **Right to data portability** (Article 20 GDPR): you have the right to (i) receive your data in a structured, commonly used, and machine-readable format, (ii) have your data transmitted directly from the Data Controller to another controller, if technically feasible, (iii) transmit your data to another controller without hindrance from the Data Controller.
- Right to object (Article 21 GDPR): you have the right to object, at any time, to the processing
 of your personal data for grounds relating to your particular situation, where the processing
 is based on the legitimate interest of the Data Controller, or the performance of a task carried
 out in the public interest or in the exercise of official authority vested in the Data Controller.
 This includes profiling. The Data Controller shall no longer process the personal data unless
 it demonstrates compelling legitimate grounds for the processing which override your
 interests, rights, and freedoms, or for the establishment, exercise or defence of legal claims.
- Automated decision-making, including profiling (Article 22 GDPR): you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- **Right to withdraw consent** (Article 7(3) GDPR): you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

To exercise the aforementioned rights, you can send a request to the Data Controller by writing to the contact details of Rozes indicated in the header of this policy.

Finally, we inform you that you have the right to lodge a complaint with the competent Data Protection Authority, which in Italy is the Garante per la Protezione dei Dati Personali.

EXTENDED COOKIE POLICY

Cookies are small files that your browser automatically saves on your device's hard drive when you visit our Website. They allow us to collect information about your browsing activity. Cookies are stored by the browser on the specific device used (computer, tablet, smartphone), based on the user's preferences. Similar technologies, such as transparent GIFs and all forms of local storage introduced with HTML5, can be used to collect information about user behaviour and service usage. Therefore, hereinafter we will refer to cookies and all similar technologies simply using the term "cookies".

Each cookie has an owner that indicates its affiliation. The owner corresponds to the domain specified in the cookie. Cookies installed by the website that the user is visiting are defined **"first-party" cookies**, while cookies sent by another owner, such as social media platforms or advertising network/technology providers, are defined as **"third-party" cookies**.

The **duration** of cookies installed can be limited to the browsing session or extend for a longer period, even after the user has left the website. These cookies are called persistent, and their duration is set by the server at the time of their creation. In some cases, an expiration date is set, in other cases the duration is unlimited. To disable, remove or block cookies, it is however possible to use the browser settings (as will be better specified below) or the DoNotTrack option, where available. In case of deactivation, the Data Controller cannot guarantee the complete usability of the website.

Types of Cookies used by this Website

Technical Cookies

These cookies are essential for the proper functioning of the Website and for the use of some features, such as allowing the user to view the pages of **rozes.ai** in the language that is chosen or that is deducted from the preferences of the browser used. Without technical cookies, the services normally offered by the Website may be partially or totally inaccessible. Since these cookies are necessary for browsing and using the requested services, **the Data Controller does not need your consent for their installation**, which occurs automatically following access to the Website. However, you can block or remove technical cookies by changing the configuration of your browser options. In this case, we point out that it may not be possible to access certain areas of the Website or use some of the services offered.

List of Cookies on the Website rozes.ai

Name	Provider	Type	Purpose	Duration
wp-wpml_current_language	First-party	Technical	Saves current language settings	Session
wpEmojiSettingsSupports	First-party	Technical	Determines whether the user's browser can correctly display emojis	Session

Data Location, extra-EEA Transfer and Data Communication

Personal data collected are stored on servers located within the European Union and are not transferred outside the EEA. Data collected using cookies may also be disclosed to third parties involved in the management of the Website or to external personnel (such as third-party technical service providers, hosting providers, IT companies), who will be appointed, if necessary, as data processors.

How to Disable Cookies on your Device

You can disable cookies by changing your browser settings. Below are the links to the main browsers for modifying session settings.

Chrome Firefox Edge Opera Safari

With regard to any cookies installed by third parties, you can also manage your settings by visiting the relevant opt-out link (if available), using the tools described in the third party's privacy policy, or by contacting the third party directly.

For information regarding the contact details of the Data Controller and the Data Protection Officer (DPO), as well as the rights of the data subjects, please refer to the extended privacy policy of the Website.

Last update: 15/05/2024