

Privacy Policy of EUROMED srl

EUROMED srl collects some Personal Data from its Users.

POLICY SUMMARY

Personal Data collected for the following purposes and using the following services:

Contacting the User

Contact form

Personal Data: address, city, email address, first name, last name, phone number and various types of Data

Analytics

Google Analytics with anonymized IP, Facebook Ads conversion tracking, Analytics collected directly and Yandex Metrica

Personal Data: Cookies and Usage Data

Interaction with live chat platforms

What's up Widget

Personal Data: Cookies, Data communicated while using the service and Usage Data

Tag Management

Google Tag Manager

Personal Data: Cookies and Usage Data

Further information about Personal Data

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery.

The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by EUROMED srl depends on the payment system used.

Contact information

Owner and Data Controller

EUROMED srl - Viale Elba 3 - 57037 Portoferraio - (LI)

Owner contact email: info@twm-rent.it

FULL POLICY

Owner and Data Controller

EUROMED srl - Viale Elba 3 - 57037 Portoferraio - (LI)

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Types of Data collected

Among the types of Personal Data that EUROMED srl collects, by itself or through third parties, there are: Cookies, Usage Data, email address, Data communicated while using the service, first name, last name, phone number, address, various types of Data and city.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using EUROMED srl.

Unless specified otherwise, all Data requested by EUROMED srl is mandatory and failure to provide this Data may make it impossible for EUROMED srl to provide its services. In cases where EUROMED srl specifically states that some

Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.
Any use of Cookies – or of other tracking tools – by EUROMED srl or by the owners of third-party services used by EUROMED srl serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through EUROMED srl and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of EUROMED srl (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.

- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Analytics, Remarketing and behavioral targeting, Advertising, Contacting the User, Managing contacts and sending messages, Interaction with live chat platforms and Tag Management.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Advertising

This type of service allows User Data to be utilized for advertising communication purposes displayed in the form of banners and other advertisements on EUROMED srl, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Cookies to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside EUROMED srl. For more information, please check the privacy policies of the relevant services.

In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics with anonymized IP (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of EUROMED srl, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.

Contacting the User

Contact form (EUROMED srl)

By filling in the contact form with their Data, the User authorizes EUROMED srl to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data collected: address, city, email address, first name, last name, phone number and various types of Data.

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on EUROMED srl in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

Further information about Personal Data

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery.

The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by EUROMED srl depends on the payment system used.

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Cookie Policy

EUROMED srl uses Cookies. To learn more and for a detailed cookie notice, the User may consult the Cookie Policy.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of EUROMED srl or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, EUROMED srl may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, EUROMED srl and any third-party services may collect files that record interaction with EUROMED srl (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How "Do Not Track" requests are handled

EUROMED srl does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within EUROMED srl and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through EUROMED srl (or third-party services employed in EUROMED srl), which can include: the IP addresses or domain names of the computers utilized by the Users who use EUROMED srl, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using EUROMED srl who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

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, including the security measures concerning the operation and use of EUROMED srl. The Data Controller, unless otherwise specified, is the Owner of EUROMED srl.

EUROMED srl (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by EUROMED srl as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookies

Small sets of data stored in the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to EUROMED srl, if not stated otherwise within this document.

Cookie Policy of EUROMED srl

Cookies consist of portions of code installed in the browser that assist the Owner in providing the Service according to the purposes described. Some of the purposes for which Cookies are installed may also require the User's consent.

Where the installation of Cookies is based on consent, such consent can be freely withdrawn at any time following the instructions provided in this document.

Technical Cookies and Cookies serving aggregated statistical purposes**Activity strictly necessary for the functioning of the Service**

EUROMED srl uses Cookies to save the User's session and to carry out other activities that are strictly necessary for the operation of EUROMED srl, for example in relation to the distribution of traffic.

Activity regarding the saving of preferences, optimization, and statistics

EUROMED srl uses Cookies to save browsing preferences and to optimize the User's browsing experience. Among these Cookies are, for example, those used for the setting of language and currency preferences or for the management of first party statistics employed directly by the Owner of the site.

Other types of Cookies or third parties that install Cookies

Some of the services listed below collect statistics in an anonymized and aggregated form and may not require the consent of the User or may be managed directly by the Owner - depending on how they are described - without the help of third parties.

If any third party operated services are listed among the tools below, these may be used to track Users' browsing habits – in addition to the information specified herein and without the Owner's knowledge. Please refer to the privacy policy of the listed services for detailed information.

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

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Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.

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Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

How to provide or withdraw consent to the installation of Cookies

In addition to what is specified in this document, the User can manage preferences for Cookies directly from within their own browser and prevent – for example – third parties from installing Cookies.

Through browser preferences, it is also possible to delete Cookies installed in the past, including the Cookies that may have saved the initial consent for the installation of Cookies by this website.

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses: [Google Chrome](#), [Mozilla Firefox](#), [Apple Safari](#) and [Microsoft Internet Explorer](#).

With regard to Cookies installed by third parties, Users can manage their preferences and withdrawal of their consent by clicking the related opt-out link (if provided), by using the means provided in the third party's privacy policy, or by contacting the third party.

Notwithstanding the above, the Owner informs that Users may follow the instructions provided on the subsequently linked initiatives by the [EDAA](#) (EU), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

Owner and Data Controller

EUROMED srl - Viale Elba 3 - 57037 Portoferraio - (LI)

Owner contact email: info@twm-rent.it

Since the installation of third-party Cookies and other tracking systems through the services used within EUROMED srl cannot be technically controlled by the Owner, any specific references to Cookies and tracking systems installed by third parties are to be considered indicative. In order to obtain complete information, the User is kindly requested to consult the privacy policy for the respective third-party services listed in this document.

Given the objective complexity surrounding the identification of technologies based on Cookies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of Cookies by EUROMED srl.

Latest update: May 29, 2018