COOKIES POLICY

Our Cookie Policy intends to describe the types of cookies used by the Site https://www.closr.it/ (hereinafter “Site”), the purpose of the installed cookies, and the ways in which the User can select or deselect the cookies of the Site and take advantage of the offered services.

We use cookies to make our Site easier and more intuitive. Cookie data are collected to make the Site browsing experience more enjoyable and more efficient in the future.

1. WHAT ARE COOKIES

Cookies are small text strings sent by the applications visited by the User to his terminal (usually the browser), where they are stored to be retransmitted to the same applications at the following visit of the same User.

The word Cookie relates both to the same cookies as well as to all similar technologies.

Cookies are used in order to faster access to online services and to improve the activity of browsing of the User through session tracking, storage of information, faster uploading of contents, etc.

2. TYPES OF COOKIES

Cookies are classified as follows:

**First-Party Cookies:** proprietary cookies used by the Site in order to enable the User to browse more efficiently and/or monitor the actions he exercises;

**Third-Party Cookies:** cookies that are set from a Site other than the one the User is currently visiting in order to allow him to browse more efficiently and/or to monitor the actions exercised by him.

Furthermore, there are different types of cookies:

- **Technical and Analytics Cookies:** cookies regarding activities strictly necessary for the operation and provision of the service (ex. session cookies to log in), cookies related to the activity of saving preferences and of optimization (ex. cookies to save the cart or language choices/currency, etc.), analytical cookies for the collection of information in an anonymous and aggregate form.

Technical cookies include:

- **Session or Browsing Cookies:** used to keep track of the activity of User in the internet. They guarantee normal browsing and use of the Site, allowing for example to rapidly browsing and make a purchase or to authenticate for accessing to restricted areas, and are actually necessary for its proper functioning;

- **Functional Cookies:** allow the User to browse in accordance to a set of selected criteria (for example, language, products selected for the purchase, etc.) in order to improve the service offered to the User;

- **Analytics Cookies:** used to collect information regarding the use of the Site. The Data Controller uses this information for statistical analysis and to improve the Site and to simplify its use, as well as to monitor its correct functioning. This type of cookie collects anonymous information regarding the activity of Users in the Site and regarding the modalities in which they reached the visited Site and the pages. Cookies in this category are sent from the site itself or from third-party domains. Analytical cookies may be:
- **First-Party Analytics Cookies:** assimilated in terms of regulation to technical cookies whether used by the Data Controller of the Site without profiling the User, but exclusively to collect information, in an aggregate and anonymous form, regarding the number of Users and how they visit the Site for statistical purposes and to improve the performance of the site;

- **Third-Party Analytics Cookies:** are made available by third parties and are assimilated to technical cookies if third parties do not make User profiling by using appropriate tools to reduce the identification potential of cookies (for example, by masking significant portions of the IP address) and without integrating gathered information with other information already made available.

With regard to technical cookies, it is required to exclusively release the Cookie Policy without requesting the consent. Disabling or deleting the relevant cookies by accessing to the functions of the browser of the User, may compromise the optimal browsing on this Site.

- **Profiling Cookies:** used to track User browsing on the internet and to create a profile of his habits:
  - **First-Party Profiling Cookies:** installed by the Data Controller to create User profiles in order to send advertising messages in line with the preferences displayed in the browsing in the internet. Given their particular invasiveness in the private sphere of Users, the applicable law requires that Users, prior adequate notice regarding the use of the relevant cookies, must give their consent;
  - **Third-Party Profiling Cookies:** used by third parties accessing to the information, therefore not in anonymous and aggregated modality, and crossed with other data already in their possession. The Site does not have direct control of third-parties cookies. The User is therefore encouraged to check the Cookie Policy on website of the third party.

The use of these cookies requires the acquisition of prior consent of the User.

3. **COOKIES INSTALLED ON THE SITE**

The cookies on this Site are:

- **technical and analytics cookies** necessary to operate the Site, for aggregated statistical analysis and to improve and simplify the use of the Site and to save preferences of browsing and to optimize the browsing experience of the User;

- **third party cookies** which may also make activity of profiling and tracking of the User even without the acknowledgement of Data Controller. For further information, we recommend the User to carefully review the privacy policies of the individual services listed below.

Please find below the list of third-party cookies used by this Site:

- **Google Analytics**
  
  for analytics

  For further information please visit: [https://www.google.com/intl/en_en/analytics/learn/privacy.html](https://www.google.com/intl/en_en/analytics/learn/privacy.html)

- **Facebook Sharing**
  
  Facebook uses cookies to provide the User with "share" and "like" functionality on their dashboard. Provided by Facebook, Inc.

  For more information, see the page [https://www.facebook.com/about/privacy](https://www.facebook.com/about/privacy)

- **Facebook login**
  
  Facebook uses cookies to give Users the ability to sign up using their Facebook account. Provided by Facebook, Inc.
4. **COOKIES DURATION**

Cookies have a duration determined by the expiration date or a specific action such as closing the browser set up at the time of installation. Cookies may be:

- **Temporary or session**: used to store temporary information, allowing the User to link actions that are executed during a specific session, and are removed from the computer when the browser is turned off;

- **Persistent cookies**: used to store information, such as the login name and password of the User, in order to prevent the same User from typing them again each time he visits a specific website. These remain stored on the computer even once closed the browser.

5. **EXPRESSION OF CONSENT**

With respect to cookies that require consent, at the first visit of the Site, the User automatically displays a banner containing both the link to this complete Cookie Policy and the request for consent to the use of cookies.

Consent can be provided by the User by clicking the OK button on the banner and/or by scrolling on the page and/or accessing to any other sections of the Site by clicking on the links on the web page below the banner itself. At any time, it is possible for the User to modify or revoke his consent.

6. **HOW TO DISABLE COOKIES**

The User can manage preferences relating to cookies directly in his browser and prevent third parties from installing cookies. Further, it is also possible to delete cookies that have been installed in the past, including the cookie in which the expression of consent to the installation of cookies has been saved by this Site. By disabling all cookies, the operation of this Site may be compromised.

The User can find information and exercise his right to object the tracking of cookies in his browser at the following addresses:


- Google Chrome: [https://support.google.com/chrome/answer/95647](https://support.google.com/chrome/answer/95647);

- Mozilla Firefox: [https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer](https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer);


In addition, cookies can be disabled by requesting opt-outs directly to third parties or via the website [http://www.youronlinechoices.com/it](http://www.youronlinechoices.com/it) where the User can manage the tracking preferences of most of the advertising tools.

In order to modify the settings related to Flash cookies, it is possible to click on the following link: [https://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html](https://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html).

7. **Rights of the User**

The Users may exercise specific rights with respect to Personal Data processed by the Data Controller. In particular, the User has the right to:

- withdraw its consent at any time;
- object the Processing of its Data;
- access its Data;
- monitor and request the rectification of Data;
- obtain a restriction of Processing;
- obtain the erasure or remotion of its Personal Data;
- receive its Data or obtain the transfer to a different Data Controller;
- lodge a complaint before the supervisory authority for the protection of personal data or start legal proceedings.

In order to exercise their rights, the Users may send a request to the contact information of the Data Controller indicated in this document. These requests are free of charge and performed by the Data Controller in the shortest possible time, in any case no later than 30 days.

In order to exercise these rights, please contact the Data Controller Visup srl, piazza IV novembre, 7 - 20124 Milan, admin@visup.it

Further information about data processing can be found at the following link https://www.closr.it/privacy/.

Latest update 23/05/2018
Privacy Policy

The purpose of this document is to inform Users with regard to Personal Data collected from the website Closr (hereinafter, the Application).

The Data Controller, as identified below, may amend or simply update, wholly or in part, this privacy policy informing the Users about the changes. The amendments or updates shall be binding as soon as they are published on the Application. Therefore, the User is invited to read the Privacy Policy at every access to the Application.

If the User does not accept any amendments to the Privacy Policy, the User must terminate the use of the Application and he may ask to the Data Controller to remove his Personal Data.

1. Personal Data collected by the Application

The Data Controller shall collect the following categories of Personal Data:

A. Voluntary contents and information provided by the User

- **Contact information, credentials, contents:** for example biographical data, e-mail address or postal address or other contact details, password and security information used for authentication and access to the account, personal interests and preferences and any other personal contents, etc.

Any failure of the User to provide Personal Data may prevent this Application to provide its services.

The User takes any responsibility regarding Personal Data of third parties published or shared through this Application and the User ensures to be entitled to communicate or release them, holding the Data Controller harmless from any liability toward third parties.

Whether the processing of Personal Data is based on the consent of the User, he can revoke it at any time.

B. Data and contents automatically acquired while using the Application

- **Technical Data:** the computer system and the software procedures functional to this Application may acquire, in the course of their ordinary activity, any Personal Data, whose communication is implicit in the use of internet communication protocols. Such information is not collected to be associated with identified third parties, however, due to the nature of these Data, the same Data may identify Users, in the Processing and through the association, with Data held by third parties. This category includes IP addresses or domain names used by Users who connect to the Application, addresses of Uniform Resource Identifier (URI) of the requested resources, time of the request, method used submitting the request to the server, size of the file obtained, etc.

- **Usage Data:** Data may be collected relating to the use of the Application by the User, such as the pages visited, the actions performed, the features and services used by the User.

- **Geolocation Data:** the Application may collect location Data, which may be accurate or inaccurate. The precise location Data may consist in GNSS Data (Global Navigation Satellite System, such as GPS), as well as in Data which identify the nearest repeater, Wi-Fi hotspots and bluetooth, communicated when you enable products or features based on the location.

C. Personal Data collected through cookies or similar technologies

This Application uses cookies, web beacons, unique identifiers and any other similar technologies to collect Data regarding pages, visited links and other actions, which you may perform while using our Services. They are stored for being communicated back to the same websites at the next visit of the User.
The Data subject may read the complete Cookie Policy at the following address: https://www.closr.it/privacy/.

2. **Purposes of the processing**

Collected Data may be used for the following purposes:

- registration and authentication of the User
- support and contact with the User
- interaction with live chat
- external handling of payment tools through credit card, bank transfer or any other tool. The Data used for payment are acquired directly by the requested payment service provider without being processed in any way by this Application. Payments are provided
- monitoring, analysis and tracking of User behavior communicating Data to https://www.google.com/intl/it_it/analytics/learn/privacy.html
- technical monitoring of the infrastructure for maintenance, fixing and performance improvement communicating Data to https://newrelic.com/termsandconditions/privacy
- sending of e-mails or newsletter and handling of mailing list communicating Data to https://mailchimp.com/legal/privacy/
- commercial affiliation
- communication for our own promotional and commercial purposes
- communication for our own market research and surveys

3. **Personal Data processing methods**

The Processing of Personal Data is performed with IT and/or digital tools, with methods of organizations and with logics strictly related to the indicated purposes.

In certain cases, subjects other than the Data Controller which are involved in the organization of the Application may access to Data in the assistance of the management of the Application and of the activity or in the assurance of the performance of services to the User.

These subjects may be appointed, if necessary, as Data Processors by the Data Controller, may access to Personal Data of the Users whenever required and shall be contractually obliged to keep them confidential.

The updated list of Data Processors may be requested via email at the email address admin@visup.it.

4. **Legal basis for the processing**

The Data Controller processes Personal Data regarding the User whether one of the following applies:

- the User has given consent for one or more specific purposes;
- Processing is necessary for the performance of a contract with the User and/or for the performance of pre-contractual measures;
- Processing is necessary to comply with a legal obligation to which the Data Controller is subject;
- Processing is necessary for the performance of a task carried out in the public interest or for the exercise of public authority vested in the Data Controller;
- Processing is necessary for the purposes of the legitimate interest pursued by the Data Controller or by
a third party.

It is always possible to ask the Data Controller to clarify the concrete legal basis of each processing.

5. **Place**

Personal Data are processed in the operative offices of the Data Controller and in any other place in which the parties involved in the Data processing are located. For further information, you may contact the Data Controller at the following email address admin@visup.it.

Personal Data may be transferred to Countries outside the EU: USA.

With respect to these Countries, an adequacy decision by the European Commission exists or, in the absence of such decision, it is possible to request further information to the Data Controller regarding any adopted appropriate safeguards as well as the means to obtain a copy of Data or the exact location where they have been stored.

6. **Security of processing**

The Data Processing is performed with adequate methods and tools to ensure the security and confidentiality of the relevant Data, since the Data Controller has implemented appropriate technical and organizational measures which ensure, in a provable way, that the performance of the Processing is compliant with the applicable law.

7. **Period of storage of Data**

The Data Controller shall store Personal Data for the time necessary to perform the purposes connected with the performance of the agreement in force between the Data Controller and the User and, in any case, Data shall not be stored beyond the duration of years 10 after the termination of the agreement with the User.

When the Processing of Personal Data is necessary for the purposes of the legitimate interests pursued by the Data Controller, Personal Data shall be stored until the performance of the relevant interest.

When the Processing of Personal Data is based on consent of the User, the Data Controller may store Personal Data until their withdrawal.

Personal Data may be stored for a longer period of time in order to perform a legal obligation or an order of the public authority.

All Personal Data shall be deleted at the end of the period of storage. At the expiration of such period, the rights of access, rectification, erasure and data portability of Data can not be exercised.

8. **Automated individual decision-making**

All collected Data shall not be subject to automated individual decision-making, including profiling, which may produce legal effects concerning the Data Subject or may significantly affect the Data Subject.

9. **Rights of the User**

The Users may exercise specific rights with respect to Personal Data processed by the Data Controller. In particular, the User has the right to:

- withdraw its consent at any time;
- object the Processing of its Data;
- access its Data;
monitor and request the rectification of Data;

obtain a restriction of Processing;

obtain the erasure or remotion of its Personal Data;

receive its Data or obtain the transfer to a different Data Controller;

lodge a complaint before the supervisory authority for the protection of personal data or start legal proceedings.

In order to exercise their rights, the Users may send a request to the contact information of the Data Controller indicated in this document. These requests are free of charge and performed by the Data Controller in the shortest possible time, in any case no later than 30 days.

10. **Data Controller**

The Data Controller is Visup srl, with registered office in Piazza IV Novembre, 7 - 20124 Milan, Tax Code/VAT Code IT09299620964, MI-1859807, e-mail admin@visup.it, certified e-mail visupsrl@pec.it, phone 0289954779;

Latest update: 23/05/2018