

Pursuant to Art. 13 of EU Regulation 679/2016

(*privacy notice for users of the website
www.parentsmile.com*)

1 data controller

The Data Controller is Parentsmile S.r.l., represented by its legal representative pro tempore, with registered office at Contrà Mure Pallamaio 11, 36100 Vicenza (Italy), VAT/Tax ID 04286830247. The Controller can be contacted at:

- phone: **+39 0444 1450986**
- e-mail: **privacy@parentsmile.com**
- certified e-mail (PEC): **parentsmile@pec.it**

2 purposes and legal bases for processing

<i>purposes</i>	<i>legal basis</i>	<i>data provision requirement</i>
<i>To enable user navigation on the website. Browsing data (e.g., IP addresses or domain names of computers) are collected solely for the purpose of generating anonymous statistical information about the use of the site and to verify its proper functioning.</i>	The processing is based on the Data Controller's legitimate interest in allowing users to navigate the website and in providing a fast, seamless, and efficient browsing experience.	For this purpose, users automatically provide data to the Controller by browsing the website. You are free not to provide your data by choosing not to access the site, without any negative consequences for you.
<i>To respond to user inquiries or to address requests submitted through the website.</i>	Processing is based on the Data Controller's legitimate interest in promptly responding to user requests and providing relevant information.	For this purpose, users are free not to provide their personal data; however, in such cases, the Controller will not be able to respond to their requests.



<i>To send promotional communications and newsletters to interested users.</i>	Processing is based on the user's consent, which may be given during the newsletter subscription process. Users may withdraw their consent at any time by clicking the unsubscribe link found at the bottom of each email or by contacting the Controller.	For this purpose, users are free not to provide their data. however, in such cases, the Controller will not be able to send any communications.
<i>purposes</i>	<i>legal basis</i>	<i>data provision requirement</i>
<i>User registration on the website, booking, and payment for services offered through the Platform.</i>	For these purposes, we will process the personal data of registered users only if they choose to use the services provided by Parentsmile. Further details can be found in the privacy policy made available during the booking process.	

3 data recipients

Personal data may be shared with third parties either as independent controllers or as processors acting on behalf of the Controller. These may include:

- service providers (e.g., communications, hosting)
- website development partners
- marketing agencies

A complete list of data recipients is available upon request. Personal data will not be publicly disclosed.

4 data transfer outside the EU

Data will not be transferred outside the European Union. If such transfer becomes necessary, it will be carried out in compliance with applicable legal safeguards, such as Standard Contractual Clauses approved by the European Commission or equivalent measures. For cookie-related processing, please refer to the specific Cookie Policy.

5 data retention

Personal data will be retained for no longer than necessary to achieve the purposes for which they were collected. Specifically, data provided to access the website will be retained only for the duration of the session or service. Newsletter subscription data will be retained until the user withdraws consent. Once these periods expire, the data will be securely deleted or anonymized in a way that prevents any identification, even indirect.

6 profiling

Users' data will not be used for profiling or for making decisions solely based on automated processing. For cookie-based profiling, please refer to the Cookie Policy.

7 user rights

You have the following rights:

- **right of access to data:** the right to obtain confirmation from the Data Controller as to whether or not personal data concerning you are being processed, and if so, to access such data – including receiving a copy – and to obtain information regarding the processing;
- **right of rectification of data:** the right to obtain from the Data Controller, without undue delay, the correction of inaccurate personal data concerning you and the completion of incomplete data, including by providing a supplementary statement;
- **right to erasure of data (“right to be forgotten”):** the right to obtain from the Data Controller the deletion of personal data concerning you without undue delay where one of the following grounds applies:
 - o the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - o you object to the processing and there are no overriding legitimate grounds to continue;
 - o the personal data have been unlawfully processed;
 - o the personal data must be erased to comply with a legal obligation to which the Controller is subject;
- **right to restriction of processing:** the right to obtain restriction of processing from the Data Controller where one of the following applies:
 - o you contest the accuracy of the personal data, for the time necessary for the Controller to verify their accuracy;
 - o the processing is unlawful, and you oppose the erasure of the data, requesting instead the restriction of their use;
 - o although the Controller no longer needs the data for processing purposes, they are required by you for the establishment, exercise, or defense of legal claims;
 - o you have objected to processing pending verification of whether the Controller’s legitimate grounds override yours;
- **right to data portability:** the right to receive your personal data, which you provided to the Controller, in a structured, commonly used and machine-readable format, and to transmit those data to another controller where processing is based on consent or a contract and carried out by automated means;
- **right to object:** the right to object to processing carried out in the public interest or in the exercise of official authority, or based on the legitimate interest of the Controller or third parties. This includes the right to



object to processing of your personal data for direct marketing purposes, including profiling related to such marketing;

- **right not to be subject to automated decision-making:** 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.

Users can exercise their rights by sending a request to: privacy@parentsmile.com. The Controller will respond within 30 days.

8 complaints

If users wish to file a complaint regarding how their data are processed or how a complaint was handled, they may submit a complaint to the competent Supervisory Authority via the website www.garanteprivacy.it.

9 updates

This policy is subject to periodic updates. The current version was last updated on 16 December 2021.

