

PRIVACY POLICY

Information pursuant to and in accordance with Art. 13, EU REG. 2016/679

JOYFLO S.R.L. has developed *AN APPLICATION FOR GREEN PASSIONATES* (hereinafter also just "APP"), WHICH can be used both on mobile devices and on the WEB.

To this end, JOYFLO informs you that - with the activation of the aforementioned APPLICATION - the personal data collected shall be processed according to the terms and conditions below.

DATA CONTROLLER

The data controller of the collected data is JOYFLO S.R.L., with registered office in Paese (TV), via Pravato, 50. Said owner decides autonomously on the purposes and methods of processing, as well as on the security procedures to be applied to ensure the confidentiality, integrity and availability of the data.

DATA PROCESSED, PURPOSE OF PROCESSING, LEGAL BASIS AND RETENTION

COMMON DATA			
FINALITY OF PROCESSING	TYPE OF DATA	CONDITION OF LAWFULNESS OR LEGAL BASIS	DATA RETENTION
<i>Activation and use of the Application (Account Registration).</i>	<ul style="list-style-type: none"> ▪ FIRST AND LAST NAME*; ▪ E-MAIL ADDRESS*; ▪ TELEPHONE NUMBER ▪ ADDRESS ▪ DATE OF BIRTH ▪ CITY* ▪ GENDER <p style="text-align: center;">Or</p> <ul style="list-style-type: none"> ▪ SOCIAL ACCOUNT (FULL NAME AND EMAIL ADDRESS) <hr style="width: 20%; margin-left: 0;"/> <p>*Data required</p>	Consent given by filling out the registration <i>form</i> .	<p>For the duration of activation, unless a revocation of consent with the request for deactivation.</p> <p>It should be noted that the registration of data will not be indefinite, since 24 months after the last interaction of the registered user with the APP, the latter will be contacted to confirm such registration, and in case of non-confirmation, his account will be automatically deactivated.</p>
<i>Use of the various features of the APP (e.g., finding tips and information on the world of green, requesting advice and support from agronomists; receiving personalized advice; purchasing products, etc.);</i>	<p>ADDRESS WHERE THE GARDEN/TERRACE IS LOCATED</p> <hr style="width: 100%;"/> <p>IMAGES/VIDEOS OF THE GARDEN, TERRACE, PLANTS</p>	<p>Consent given by entering this data</p> <hr style="width: 100%;"/> <p>Consent given by uploading such images</p> <hr style="width: 100%;"/> <p>Explicit consent to share data with other users</p>	<p>For the duration of activation/registration, unless a revocation of consent occurs with a request for deactivation.</p>
<i>Geolocation</i>	LOCATION OF THE REGISTERED USER	Consent	For the duration of the activation of the geolocation tool.
<i>Purchase management bundled systems, such</i>	USER ACCOUNT	Performance of the contract (Art. 6, para. 1,	Data will be stored for the duration of the contractual relationship

<p><i>as subscriptions for services of:</i></p> <ul style="list-style-type: none"> - <i>plant recognition;</i> - <i>consulting requests to experts in the field</i> - <i>cultivation care</i> - <i>Management of stores in APP.</i> <p><i>Consequent management of invoicing for purchases made.</i></p>	<p>ADDRESS</p> <p>IMAGES/VIDEOS</p> <p>OTHER INFORMATION PROVIDED WHEN REQUESTING CONSULTANTS/EXPERTS</p> <p>PRODUCTS/SERVICES PURCHASED</p> <p>PRODUCTS/SERVICES OFFERED IN THE STORE MANAGED IN APP</p>	<p>letter b) of EU Reg. 679/2016)</p>	<p>and for a period after the conclusion of the contract equal to 10 years;</p>
<p><i>User Satisfaction Evaluation</i></p>	<p>DATA COLLECTION ON USER EXPERIENCE AND SATISFACTION THROUGH PARTICIPATION IN SPECIFIC QUESTIONNAIRES IN ORDER TO IMPROVE THE FUNCTIONALITY OF THE APP.</p>	<p>Consent</p>	<p>For the duration of 24 months, unless there is a revocation of previously manifested consent.</p>
<p><i>Newsletter and Marketing</i></p>	<p>ACCOUNT</p> <p>EMAIL ADDRESS</p> <p>DATA ON SERVICES REQUESTED</p> <p>DATA ON PRODUCTS PURCHASED</p>	<p>Consent</p> <p>Legitimate interest, in the only cases in which the data subjects have provided their contact details as part of a previous negotiating relationship with JOYFLO. The latter may thus use their data to send communications about its products and services, similar to what they have already purchased, even without having acquired specific consent for this, unless they refuse such use (so-called "soft spam" - art. 130, paragraph 4, Legislative Decree 196/2003; art. 6, paragraph 1, letter f) of EU Reg. 2016/679). In this case, in fact, the legal basis justifying the processing is the legitimate interest of the Data Controller (Recital (47) of EU Reg. 2016/679).</p>	<p>Newsletter: for the duration of activation, during the terms indicated in the first point of this table, unless a request to unsubscribe intervenes.</p> <p>Marketing: for 24 months</p>
<p><i>Analysis of user behavior aimed at improving the content of the APP and not for marketing purposes.</i></p>	<p>DATA ON VIEWED CONTENT AND USER BEHAVIOR:</p> <ul style="list-style-type: none"> - AVERAGE PAGE VIEW TIME; - PAGES VISITED; - CTA STATISTICS; 	<p>Legitimate interest of the Data Controller.</p> <p>This is not profiling, for which consent is not required, since the user is not subject to a decision based on automated processing, so that such processing will not</p>	<p>Such data will be retained for 24 months.</p>

	- AVERAGE TIME SPENT ON THE APP)	produce legal effects on the user or affect him in any way.	
<i>Sharing/transfer to third parties, acting in the green sector, of data for indirect marketing purposes</i>	USER DATA	Consent	Data will be retained until consent to such sharing/transfer is revoked.

MODE OF PROCESSING

Personal data shall be processed mainly electronically and digitally.

Processing operations shall be implemented in such a way as to ensure the logical, physical security and confidentiality of your personal data.

MANDATORY OR OPTIONAL NATURE OF DATA PROVISION

The provision to JOYFLO is only necessary for personal data used to activate and use the application. For other purposes, the provision is optional.

SCOPE OF DATA COMMUNICATION AND DISSEMINATION

Personal data shall be shared with third parties working in the green sector (e.g., the consultant agronomist). In some cases, they shall process data on behalf of and for Joyflo, as the latter's data controller (Art. 28 EU Reg. 679/2016).

The data, with prior consent, may be shared/transferred to third parties operating in the green sector for indirect marketing purposes.

The data shall also be stored at the Cloud system provider, to date AWS.

In addition, the data may be processed by our employees and/or collaborators, within the scope of their respective duties, as well as to professionals involved in the development and management of the APPLICATION.

SECURITY MEASURES

JOYFLO has taken appropriate security measures in order to minimize the risks of destruction or loss - even accidental - of data, unauthorized access or processing that is not permitted or not in accordance with the stated purposes of collection.

DATA TRANSFER ABROAD

JOYFLO will not transfer data to third countries (non-EU countries) and/or to International Organizations.

TOOLS USED BY JOYFLO (COOKIES)

General information about cookies

A cookie is a small amount of data sent to your web browser from a website or APP and which is subsequently stored on your hard drive or mobile devices. The cookie is then re-read and recognized by the web APP that sent it whenever you make a subsequent connection.

TECHNICAL COOKIES

This type of cookies is strictly necessary for the proper functioning of certain sections of the Site or the APP. They are of two categories: persistent and session:

- persistent: once the browser is closed, they are not destroyed but remain until a preset expiration date
- of sessions: they are destroyed each time the browser is closed

These cookies are necessary to properly display the Site or APP and in relation to the technical services offered, they will therefore always be used and sent, unless the user changes the settings in their browser (thus affecting the display of the Site or APP pages).

ANALYTICAL COOKIES

Cookies in this category are used to collect information about the use of the Site or APP.

Analytical cookies are sent from the Site/APP itself or from third-party domains.

ANALYTICS COOKIES FROM THIRD-PARTY SERVICES.

These cookies are used in order to collect information about users' use of the Site/APP in an anonymous form such as: pages visited, time spent, source traffic origins, geographic origin, age, gender and interests for the purpose of marketing campaigns. These cookies are sent from third-party domains external to the site/APP.

Normally, most browsers are initially set to accept cookies automatically. You can change these settings to block cookies or to alert you that cookies are being sent to your device: you can refer to your browser's instruction manual or help screen to change these settings.

COOKIES TO INTEGRATE THIRD-PARTY SOFTWARE PRODUCTS AND FEATURES

This type of cookie integrates features developed by third parties within the pages of the Site/APP such as, for example, icons and preferences expressed in social networks for the purpose of sharing content on the Site/APP or for the use of

third-party software services. These cookies are sent by third-party domains and partner sites that offer their features within the pages of the Site/APP.

PROFILING COOKIES

These are those cookies necessary to create user profiles in order to send advertising messages in line with the preferences expressed by the user within the pages of the Site/APP.

Cookies used by the JOYFLO APPLICATION.

The APP uses:

Technical cookies: always sent from our domain, they are necessary to properly display the APP, they shall therefore always be used and sent, unless the user changes the settings in his/her browser (thus affecting the display of the APP pages).

Cookies	Durati on	description
pll_language	1 year	Polylang uses this cookie to remember the language selected by the user when he/she returns to the site and to get the language information when it is not otherwise available.
cookieyes-consent	1 year	CookieYes uses this cookie to remember users' consent preferences so that they are respected on subsequent visits to this site. It does not collect or store any personal information about site visitors.

Third-party cookies used

Our Site uses Google Analytics. This is a web analytics service provided by Google Inc that uses cookies that enable statistical analysis in aggregate form regarding the use of the website visited.

JOYFLO has enabled the IP address anonymization feature.

In addition, Google cannot cross-reference the information collected with other information it already has.

Cookie	Duration	description
yt-remote-device-id	Never expires	YouTube uses this cookie to store user preferences about videos embedded in YouTube.
ytidb::LAST_RESULT_ENTR Y_KEY	Never expires	YouTube uses this cookie to store the last search result clicked by the user. This information is used to improve the user experience by providing more relevant search results in the future.
yt-remote-connected-devices	Never expires	YouTube uses this cookie to store user preferences regarding YouTube embedded videos.
yt-remote-cast-installed	session	YouTube uses this cookie to store the user's video player preferences using an embedded YouTube video.
yt-remote-session-app	session	YouTube uses this cookie to store user preferences and interface information of the embedded YouTube video player.
yt-remote-session-name	session	YouTube uses this cookie to store the user's video player preferences using an embedded YouTube video.
yt-remote-fast-check-period	session	YouTube uses this cookie to store the user's video player preferences for embedded YouTube videos.
yt-remote-cast-available	session	The yt-remote-cast-available cookie is used to store the user's preferences regarding whether casting is available on their YouTube video player.
yt.innertube::requests	Never expires	YouTube uses this cookie to record a unique ID to store data about YouTube videos the user has watched.
yt.innertube::nextId	Never expires	YouTube uses this cookie to record a unique ID to store data about YouTube videos the user has watched.

For more information about YouTube's privacy policy: <https://policies.google.com/privacy?hl=it>.

How can I disable cookies?

Most browsers are configured to accept, control, or possibly disable cookies through their settings.

The user can decide whether or not to accept cookies using his/her browser settings. Disabling all or part of technical cookies may affect the use of the features of the APP. You can change these settings to block cookies or to warn you that cookies are being sent to your device.

RIGHTS OF DATA SUBJECTS UNDER ARTS. 7, 15, 16, 17 18, 20, 21 AND 22 OF EU REG. 2016/679

We inform you that in your capacity as a data subject, in addition to the right to lodge a complaint with the supervisory authority, you have the rights listed below, which you can enforce by addressing an appropriate request to the Data Controller.

Article 15 - Right of access

You have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed and if so, to obtain access to the personal data and information regarding the processing.

Article 16 - Right of rectification

The data subject has the right to obtain from the data controller the rectification of inaccurate personal data concerning him/her without undue delay. Taking into account the purposes of the processing, the data subject has the right to obtain the integration of incomplete personal data, including by providing a supplementary declaration.

Article 17 - Right to erasure (right to be forgotten)

The data subject has the right to obtain from the data controller the erasure of personal data concerning him/her without undue delay, and the data controller is obliged to erase the personal data without undue delay.

Article 18 - Right to limitation of processing.

The data subject has the right to obtain from the data controller the restriction of processing when any of the following occurs:

(a) the data subject disputes the accuracy of personal data, for the period necessary for the data controller to verify the accuracy of such personal data;

b) the processing is unlawful and the data subject objects to the erasure of the personal data and instead requests that their use be restricted;

(c) although the data controller no longer needs the personal data for the purposes of the processing, the personal data are necessary for the data subject to establish, exercise or defend a legal claim;

(d) the data subject has objected to the processing pursuant to Article 21(1), pending verification as to whether the legitimate grounds of the data controller override those of the data subject.

Article 20 - Right to data portability.

The data subject shall have the right to receive in a structured, commonly used and machine-readable format personal data concerning him or her that have been provided to a data controller. Moreover, he/she shall have the right to transmit those data to another data controller without hindrance from the controller to whom he or she has provided them.

When exercising his or her rights with regard to data portability under paragraph 1, the data subject has the right to obtain the direct transmission of personal data from one controller to another, if technically feasible.

Article 21 - Right to object

The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her pursuant to Article 6(1)(e) or (f), including profiling on the basis of these provisions.

Article 22 - Right not to be subject to automated decision-making, including profiling

The data subject has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or which affects his or her person in a similar significant way.

Article 7 - Withdrawal of consent to processing.

The data subject has the right to withdraw consent to the processing of personal data.

Upon completion of this operation, the personal data will be removed from the archives as soon as possible.

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If you wish to have more information on the processing of Your personal data, or to exercise the rights mentioned in the previous point, you can write to: info@joyflo.com.

Before we can provide you, or change any information, we may need to verify your identity and answer some questions. A response shall be provided as soon as possible.

In addition, requests may also be addressed to the Data Controller by writing to:

JOYFLO S.R.L.
via Pravato, 50
31038-Paese (Treviso)