Privacy Notice

Dear User,

in accordance with art. 13 of EU Regulation no. 679/2016 (GDPR), I want to supply a simple clear privacy policy on how I will process the personal data provided by you or collected while you surf Bit.Fairly website. This privacy notice tells you what to expect me to do with your personal information when you make contact me with or when you use different functionalities of this website.

§ 1 What is Personal Data?

Personal data is information about who you are, where you live, what you do and more. It's any and all information that identifies you as a data subject.

In other words, personal data is any information that relates to an identified or identifiable a person - even an Internet Protocol (IP). Different pieces of information, which collected can lead to the identification of a particular person, also constitute personal data.

§ 2 Who is your Personal Data Controller?

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the way any personal information are, or are to be, processed.

My name is Paulina Sewerzynska, I am the owner of Bit.Fairly website and I am a Data Controller of your Personal Data.

There are many ways you can contact me, including by phone, e-mail and post. More details can be seen here:

- avvocato stabilito Paulina Sewerzyńska
- Law Firm Studio Legale

Via Repubblica 41, 43-121 Parma, Italy

- Telephone number: (+39) 3917913409
- E-mail: info@bitfairly.it

§ 3 What personal data I collect and why I collect it?

The kind of personal data I collect depends on the context of your interactions with me. As explained below, I collect some of this personal data when you provide it directly to me, and in some cases I receive personal data from third parties.

I process, within this website, your personal data in the following cases:

- 1. When I follow up your specific requests for assistance or information.
- 2. When you surf this website (via server logs and cookies including tracing cookies for this website

1. When I follow up your specific request for assistance or information.

I process your personal data for the purpose of incoming and outgoing post mail.

I may process for example your title, name, surname, position, department, personal and employee number, business area, place of work, signature, e-mail, phone and fax number.

What is a lawful basis for processing personal data in this case?

I process your personal data in this case based on legitimate interests under Article 6 (1) (f) of GDPR.

The processing of your data in this case is necessary to take charge of and to correctly manage your request.

How long do I store your personal data?

As soon as I no longer need your personal data for the processing purposes for which the personal data have been collected, I will delete them unless the statute-barred period applies. Certain details and correspondence may be retained until the time limit for claims, in respect of the pre-contractual or contractual relationship, has expired or to comply with regulatory requirements regarding the retention of such personal data.

2. When you surf this website.

(A) Server Logs

Server logs are simple text documents that contains all activities of a specific server in a given period of time. It is automatically created and maintained by the server. Server logs contain information classified as personal data by default under GDPR. The logs can also contain usernames if your web service uses them as part of their URL structure.

Server Logs are a technical necessity that enables you to connect to and use my website. I also process this kind of data for security purposes. In case of suspicious activity (e.g., visitor's IP address has been deemed as suspicious by security company Fortinet's global sensors network), the visitor's IP is logged in "attack logs" and the connection to my website is blocked.

What is a lawful basis for processing your personal data deriving from server logs?

I process your data from server logs to ensure the functionality and system security of my website. I am therefore legally authorized to process your data and I process your personal data in this case based on legitimate interests under Article 6 (1) (f) of GDPR.

How long do I store your personal data deriving from server logs?

I keep these server logs only for a few days for diagnostic purposes, after which I delete them automatically.

(B) Cookies, including website statistics (Google Analytics)

Like many other websites, Bit.Fairly website uses cookies. Cookies are small data files placed on your device when you browse online. They are standard across most websites and do not affect your device. Cookies help make websites work more efficiently and provide information to the owners of the site.

I use cookies that are necessary for functionality, security and accessibility. These cookies are set cannot be disabled.

I also use a tool called "Google Analytics" to collect information about use of this website. I use the information I receive from this tool only to improve this site and my services. I do not combine the

information collected using Google Analytics with personally identifiable information. I use a cookies tool to receive information from Google Analytics and I need to gain your consent for this the optional cookies I use.

You can read more about how Google uses data on: www.google.com/policies/privacy/partners.com

For mor information about cookies used by this website, consult my Cookie Policy.

§ 4 Bit.Fairly social media accounts and links

- **1.** Information collected when you access to social media platforms made available on this website such as Facebook, Instagram, LinkedIn and YouTube will be associated with your account when you are logged into these social networks. By clicking on the symbol of the social network, you will be via links automatically connected to these platforms which will collect your data according to the respective privacy policies.
- **2.** When I provide links to websites of other organizations, this privacy notice does not cover how that organization processes personal information. I encourage you to read the privacy notices on the other websites you visit.

§ 5 Your rights in relation to processing your data

Under the General Data Protection Regulation, you have a number of rights in relation to our processing of information about you.

If you want to exercise your rights, you should contact me. You have the following rights:

- a) Right to see information (right of access). You have a right to gain access to the information that I process about you and some further information.
- b) Right to rectification (correction). You have a right to have rectified incorrect information about you.
- c) Right to erasure. In very special cases, you have the right to have erased information about you before the time of our ordinary general erasure.
- **d)** Right to restriction of processing. In certain cases, you have a right to have restricted the processing of your personal data. If you have a right to have the processing restricted, in the future I may only process the information except for storage with your consent or for the purpose of determining, relying on or defending a legal claim or to protect a person or vital public interests. In that connection it is noted that archiving purposes are considered vital public interests.
- e) Right to objections. In certain cases, you have a right to object to our otherwise lawful processing of your personal data.
- **f) Right to the portability.** In the circumstances set out in Article 20 of the GDPR, you have a right to the portability of your Personal Data, allowing you to retrieve from the Company the Personal Data you have provided to it, in a structured, commonly used and machine-readable format, for the purpose of transferring it to another controller.

I will provide the person exercising one of these rights with information on the measures taken as soon as possible and in any event within one month of receipt of the request. This period may be extended by two months, considering the complexity and number of requests. If I do not comply with the request, I will inform

the person as soon as possible, and at the latest within one month of receipt of the request, of the reasons for its inaction and of the possibility of lodging a complaint with a supervisory authority and of lodging a judicial appeal.

The exercise of these rights is free of charge. However, in the event of a manifestly unfounded or excessive request, I reserve the right to (i) charge a fee reflecting administrative costs, or (ii) refuse to comply with such request.

§ 6 Recipients of your personal data

1. Your Personal Data, may be communicated to third parties who are my partners and associates in the law firm authorized to process personal data. There are other circumstances where I am required by law to disclose personal information to third parties, such as public bodies or judicial authorities.

I also use third-party contractors for the following services: to help us operate this website, assist me with hosting, storage, emergency recovery services, for the provision of screening services, and analytic services. I may disclose your personal data to these Recipients in order to receive their services.

I may ask for your consent to share your information with other third parties. In any such case, I will make it clear why and how we want to share the information.

I may also be obliged to disclose your personal data to state authorities and public authorities, (courts and law enforcement authorities i.e. (police and prosecutor), and only to the extent necessary as required by applicable and effective law to exercise their power.

2. Some of your Personal Data are transferred to Recipients who may be established outside the European Economic Area. I ensure that the processing of Personal Data by these Recipients is carried out pursuant to the Applicable Law. In fact, the transfer of Personal Data is based alternatively on an adequacy decision, or the Standard Contractual Clauses issued by the European Commission.

§ 7 Complaints

If you believe that your personal data has been processed illegally, you may log a complaint with one of the supervisory authorities responsible for ensuring compliance with the data protection regulations in force.

In Italy, complaints may be submitted to the Italian Data Protection Authority - the "Garante per la Protezione dei Dati Personali" (http://www.garanteprivacy.it).

More information on how to submit a complaint can be found on the Italian Data Protection Authority's website at http://www.garanteprivacy.it.

§ 8 Changes to this Privacy Notice

This notice may be subject to changes and additions over time, which may be necessary as a result of changes to the characteristics of the processing of personal data described above, as well as in relation to new regulatory provisions in the field of personal data protection.

Any changes will be made available on this page.

This Data Protection Notice is updated to 25 May 2022.

You can download this document in PDF file