



INFORMATION PURSUANT TO ART. 13 AND 14 OF REG. (EU) 2016/679 ("GDPR")

Amilon provides below the information required by the GDPR regarding the processing of personal data related to the registration on the www.ideashopping.com/portal ("Portal") and the related application (the "mobile" version of the Portal; "Application") and the use of the related services by users ("User/s"), in particular, the purchase of Shopping Vouchers (also in favour of a third party beneficiary; "Beneficiary") and ideaShopping, as better governed by the general terms and conditions of contract. The conditions of registration and use and the conditions of sale are available in the footer of the Portal and in the dedicated section of the Application.

1. Sources and categories of data processed – nature of the provision

As indicated in the conditions of registration and use, the User, in order to use his/her ideaShopping on the Portal, must:

- register on the same (i) by filling out the appropriate form, with the insertion of name and surname, e-mail address, telephone number (on which the User will receive the security code to confirm his/her identity), province of residence, as well as creating a password (being able to optionally add the address of residence, age group and gender) or (ii) through the so-called "social login", i.e. using, for example, his/her Google account (in this case, the reference provider will transmit the following data to Amilon: e-mail address, alphanumeric identification code, date of registration on the Portal, reference provider and last access to the latter), and then log in using his/her credentials, or
- only through the desktop version of the Portal, access in "guest" mode; in this case he/she will have to enter the "code" of his/her ideaShopping, as well as provide the number of his/her mobile phone, where the User will receive the security code for identity confirmation.

If the User merely purchases an ideaShopping on the Portal – desktop version (also possible without authentication), he/she must only indicate the e-mail address to which it is to be delivered.

If the User decides to give the Shopping Voucher to a Beneficiary, he/she will provide the data to Amilon for delivery purposes (name and surname, e-mail address), as well as specifying his/her data (name and surname, e-mail address).

Amilon also processes the data of the payment instrument selected by the User (and communicates them to the so-called "acquirer", i.e. the payment service provider that manages the payment, acting as an independent data controller), as well as purchase information.

For the purposes of providing the services referred to in paragraph 4 letter a., Amilon, subject to the User's authorization, has access to the camera, geolocation and microphone of the User's device. The User may also authorize access to the Application through biometric data (e.g. fingerprint or facial recognition) according to the settings of their device; however, in this case Amilon does not process the User's biometric data in any way, as it is only the device that process them.

Information on the processing of browsing data and those relating to the use of cookies can be consulted in the [privacy and cookie policy](#) made available in the cookie banner that appears at first access, in the footer of the Portal and in the dedicated section of the Application.

2. Identity and contact details of the Data Controller

The data controller is **Amilon S.r.l.**, Tax Code and VAT No. 05921090964, with registered office in via Natale Battaglia n. 12, Milan, e-mail address privacy@amilon.eu ("Amilon" or "Data Controller").

3. Contact details of the Data Protection Officer (DPO)

The DPO can be contacted at the e-mail address dpo-ext@amilon.eu.

4. Purposes of processing, legal basis and data retention times

WHY IS PERSONAL DATA PROCESSED?	WHAT IS THE CONDITION THAT MAKES THE TREATMENT LAWFUL?	HOW LONG DO WE KEEP PERSONAL DATA?
<p>a. To allow registration on the Portal and the use of the related services, also through the Application.</p> <p>Among the services offered on the Application there is the possibility of:</p> <ul style="list-style-type: none">i load your Shopping Vouchers, loyalty cards and other vouchers (e.g. discount coupons) onto a "wallet", by accessing the camera of the device used,ii identify nearby shops that accept Shopping Vouchers for the purchase of goods or services, by geolocation,iii receive push notifications related to actions to be performed on the Application. <p>Among the services provided, there may also be a special chatbot, based on an artificial intelligence system, for the management of assistance requests by the User. It should be noted that the data provided will also be processed in order to improve the effectiveness of the chatbot, so that over time it provides increasingly adequate and relevant responses to requests for assistance. The User can always call on a human operator for assistance.</p>	<p>Performance of a contract to which the User is party (or in favour of which the contract is concluded, in the case of the Beneficiary).</p> <p>The User's consent for the processing related to the services referred to in letters i (camera access), ii (geolocation) and iii (push notifications).</p> <p>The pursuit of the legitimate interest of the Data Controller for the processing of data for the purpose of training the chatbot.</p>	<p>For the entire duration of the contractual relationship with Amilon (registration on the Portal) and, as an ordinary limitation period, for the following 10 years.</p> <p>In the event of litigation, data are kept until the expiry of the terms of appeal actions.</p> <p>With regard to the activity data in points i to iii, no storage is carried out.</p>

<p>b. To establish, exercise or defend the rights of Amilon.</p> <p>In order to mitigate the risk of fraud in payments on the Portal, the following are provided:</p> <ul style="list-style-type: none"> - identification of Users (by means of confirmation via mobile phone); - the carrying out of checks on the payment instrument data entered during the User's purchase. 	<p>The pursuit of the legitimate interest of the Data Controller.</p>	
<p>c. To fulfil administrative-accounting, tax and other legal obligations, in accordance with the requirements of current legislation.</p>	<p>The fulfilment of a legal obligation to which the Data Controller is subject</p>	<p>Data will be stored for 10 years, as a general ten-year retention period prescribed by law.</p>
<p>d. To send – to the e-mail address provided by the User – promotional communications regarding products supplied by Amilon similar to those purchased on the Portal (e.g. regarding the addition of a new gift card in the catalogues of Amilon's e-commerce sites or in relation to a particular discount applied to a certain brand of gift cards sold therein)</p>	<p>The so-called "soft spam" referred to in art. 130, c. 4 of Legislative Decree no. 196/2003 ("Privacy Code").</p>	<p>Until the data subject opposes (by clicking on the "<i>unsubscribe</i>" link in each communication).</p>
<p>e. To carry out profiled marketing activities, i.e. the processing of a user profile on the basis of the data provided by the user (at the time of registration and purchase) in combination with the information relating to navigation on the Portal (inferred, in particular, from online clicks on certain products/sections) collected through tracking tools, in order to: offer promotional messages in line with that profile, either through banner ads, push notifications or automated emails.</p>	<p>The User's consent, which is optional and revocable at any time.</p>	<p>Data will be kept for 3 years, without prejudice to the User's right to object or withdraw the latter's consent.</p>

After the expiry of the storage terms indicated above, data will be destroyed, deleted or made anonymous, compatibly with the technical timing of deletion and backup

5. Provision of data

As clarified above, the provision of data marked with an asterisk is necessary for registration on the Portal.

Therefore, failure to provide the aforementioned data will make it impossible for Users to use the services offered by Amilon on the Portal.

6. Categories of data recipients

Data may be processed by third parties operating as independent data controllers, such as, for example, public authorities and professional firms, entitled to receive them, as well as the so-called *acquirer* at the payment stage as indicated above (par. 1) and the anti-fraud service provider (Riskified Ltd).

Data may also be processed, on behalf of the Data Controller, by third parties, designated as data processors pursuant to Article 28 of the GDPR, who carry out activities functional to the pursuit of the above purposes (e.g. IT service provider, customer care and marketing services).

The above entities may be established outside the EU/EEA – specifically: the processing of the anti-fraud service provider may be carried out in the United States and Israel, the processing of the IT service provider in the United States – in countries with an adequacy decision pursuant to art. 45 of the GDPR; where Amilon proceeds with the transfer of data to countries without an adequacy decision, it will resort to the appropriate transfer mechanism referred to in art. 46 of the GDPR (in particular, the SCCs).

In addition, data are processed by Amilon employees - belonging to the company functions responsible for pursuing the purposes indicated above - who have been expressly authorized to process the data and who have received adequate operating instructions.

7. Rights of the data subjects

The data subjects (i.e. the subjects to whom the data refer; i.e., User and Beneficiary) may exercise the rights referred to in art. 15-22 of the GDPR, by sending a communication to the contact points indicated in par. 2.

In particular, data subjects may obtain from the Data Controller confirmation as to whether or not personal data concerning them is being processed and, if so, access to the same and to the information referred to in art. 15 of the GDPR, the rectification of inaccurate data, the integration of incomplete data, the deletion of data in the cases provided for by art. 17 of the GDPR, the limitation of processing in the cases provided for by art. 18 of the GDPR, as well as object, for reasons related to their particular situation, to the processing carried out for the legitimate interest of the Data Controller; In addition, if the processing is based on consent or contract and is carried out by automated means, they may request to receive the data in a structured, commonly used and machine-readable format, as well as, if technically feasible, to transmit them to another controller without hindrance ("right to portability").

As indicated above, data subjects may, at any time, revoke the consent given (also through the appropriate function in their account) and object to the processing for marketing purposes (also by clicking on the "*unsubscribe*" link in every e-mail communication).

In any case, data subjects have the right to lodge a complaint with the competent supervisory authority in the Member State where they habitually reside or work or in the State where the alleged infringement occurred.