

#### Owner and data controller

In compliance with Legislative Decree no. 196/2003 and European Regulation (EU) 2016/679, hereinafter also just GDPR, we inform you that the Data Controller of the Data provided by our Users is SMART RESEARCH SRL, with registered office in Via A. Lamarmora 16, 20122 Milan contactable at the email addresses [privacy@smartresearch.it](mailto:privacy@smartresearch.it) and [info@smartresearch.it](mailto:info@smartresearch.it)

The activities proposed online by Smart Research srl are carried out in full compliance with international, community and national regulations regarding privacy and data protection.

In addition to what is published on this page, further clarifications may be requested from Smart Research srl by sending an email to the aforementioned addresses.

#### Collection and use of personal data

In full compliance with the provisions of Legislative Decree no. 196/2003 as well as the European Regulation (EU) 2016/679, it is declared that Smart Research srl collects personal data and processes such data exclusively through and on the basis of the legitimate consent expressed by its Users.

The processing carried out on the personal data provided by Users may include the following activities: collection, recording, organisation, storage, processing, modification, communication, cancellation and destruction (the list of such activities is reproduced for purely illustrative purposes) of the data provided.

Smart Research srl does not disseminate data.

#### Purpose of the Processing

The purposes of the processing depend on the need to provide the services described below, to allow their necessary management, as well as to provide adequate assistance to our Users.

The object of processing is exclusively the data freely provided to us by the User, on the basis of his legitimately expressed consent. In particular, when registering on the website [www.smartresearch.it](http://www.smartresearch.it) we collect data relating to name, surname, email address, gender and date of birth.

The questionnaires submitted to Users respond either to market surveys that Smart Research srl carries out on behalf of third parties or represent simple consultations promoted directly by Smart Research srl.

The information collected can be provided by Smart Research srl in an anonymous and aggregated form to Third Parties who intend to know the opinion of Users in order to implement the effectiveness and distribution of their products/services.

Smart Research srl uses the information collected alone or in combination with other information to improve our capabilities to provide relevant content to our users and develop increasingly useful features.

Smart Research srl also uses the data provided by the User to contact him in the event of a possible reward for having responded to a survey or to invite him to participate in further surveys based on the user profile developed by Smart Research srl thanks to the data personal data collected during registration and any additional data that the User will freely provide on their personal profile page or by answering questions contained in the Smart Research srl offered by the platform directly or on behalf of third parties.

The aforementioned Third Parties will never come into possession of the users' personal data but will only be able to exploit them in an anonymized form to better direct their opinion collection campaigns created through Smart Research srl.

The user's data is also collected for the exercise of the following purposes:

- the provision of the basic service or optional services and more generally for administrative-accounting or technical purposes;
- the response to specific information requests from the User;
- information to the User during maintenance on the Site or any disruptions;
- any profiling of the User to allow Smart Research srl to direct the investigations of its Third Party customers on the Smart Research srl Community in the best possible way;
- the defense by the Data Controller, in court or in the preparatory stages of its possible establishment, against abuses in the use of the same or related services by the User;
- the provision of a customer support service that requires access to your information for technical assistance such as with the design and implementation of surveys or the resolution of technical problems related to surveys;

With respect to survey data, we may refer to statistics such as response rates, question and answer word counts, and average number of questions in a survey and publish interesting observations for informational or commercial purposes. When we do this, neither the individual survey authors nor the survey participants will be identified or identifiable unless they have given us their permission.

The privacy and confidentiality of user data is undoubtedly the highest priority of Smart Research srl.

We treat survey questions and answers as private information

Smart Research srl periodically updates the information: therefore the user is required to periodically check for any updates thereto, which may be notified to the user by Smart Research srl.

In the event of material changes made to this policy, users will be informed about them through a notification via email and on the Smart Research srl home page.

#### Legal bases for legitimate data processing

The processing of personal data by Smart Research srl is based on the following legal bases:

- need to comply with the Conditions of use of Smart Research srl reported in this document;
- consistently with the consent granted, which can be revoked at any time by deleting the User's account, communicating the desire to revoke the consent by writing to [cancelami@smartresearch.it](mailto:cancelami@smartresearch.it) or [Info@smartresearch.it](mailto:Info@smartresearch.it)
- need to comply with our legal obligations, deriving from an internal law, a regulation or other secondary regulatory act as well as from European Union law;
- the need to safeguard the vital interests of users or others;
- the pursuit of a public interest;
- the need to pursue the legitimate interest of Smart Research srl or other subjects, these include the legitimate interests in the provision of a current, protected, specific and advantageous service, as well as the development of further features and improvements and the protection of rights of Smart Research srl or third parties provided that such interests do not prevail over the interests or fundamental rights and freedoms of the Users who require the protection of their personal data.

#### Recipients of personal data and information sharing

We share your personal information with parties who help us provide our services.

We contractually bind these parties to keep the information of which they become aware confidential and to use it exclusively for the purpose of providing their services. Examples of services include payment processing services, hosting services, email services, and web traffic analysis tools.

We may share information if required by law or in the context of a corporate restructuring or acquisition.

We may disclose your information as required or permitted by law or when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, subpoena or other legal process served on us.

If ownership or control of all or part of our services or related resources changes, or if we engage in a corporate reorganization (including mergers) or any other intervention or transfer between companies, Smart Research srl may transfer your information to the new owners or successors, in order to be able to continue to provide our services, in full compliance with the privacy legislation in force at national and European level.

Furthermore, the personal data provided by Users may be shared by Smart Research srl with the categories of subjects and for the purposes indicated below:

- people, companies, associations or professional firms that provide business and consultancy services to Smart Research srl, with particular but not exclusive reference to accounting, administrative, legal, tax and financial matters;
- associated companies and/or belonging to the same corporate group, including those located abroad in states EU;
- to all natural and legal persons (legal, administrative, tax consultancy firms, auditing firms, couriers and forwarders, data processing centres, etc.) in cases where communication is necessary for the purposes illustrated above;
- public authorities: for purposes related to the fulfillment of legal obligations in the fields of taxation, contributions and the fight against crime;
- to subjects whose right to access the data is recognized by legal provisions or secondary legislation.

Furthermore, both internal personnel as data processors and external parties appointed as "data processors" may have knowledge of the data as they are responsible for carrying out the requested services;

- to third parties who use our statistical data collection services. We provide aggregate statistical data that helps people and companies understand how people interact with their Smart Research srl questionnaires;

- to Third Parties who carry out measurement activities to provide statistical data and reports to other third parties;

The list of such subjects whose data may be communicated is available at the headquarters of the data controller; the complete list may be provided, also by electronic means, upon request of the individual interested

#### Personal data collected

Any information relating to a natural person, provided that they are identified or identifiable, constitutes personal data, subject to processing in accordance with the provisions of this information, however collected through the Smart Research srl platform. A natural person is identifiable when he can be identified directly or indirectly, through an identifier such as a name, an identification number, location data, an online identifier, one or more elements characteristic of his physical, physiological, genetic, mental identity, economic, cultural or social belonging to that natural person. Anonymous data is not considered personal.

The basic personal data collected by the Smart Research srl platform refers exclusively to subjects who have reached the age of majority or who according to the provisions of art. 8 of the GDPR have reached the age of sixteen and the object of processing includes, by way of example, the following data:

- personal data e.g. Name, surname, city of origin and e-mail address which are collected during registration.
- particular categories of data, as identified by art. 9 of the European Regulation (EU) 679/2016 e.g. data that reveals your racial or ethnic origin, political opinions, religious beliefs or

philosophical, or trade union membership, as well as genetic, biometric data intended to uniquely identify a natural person, data relating to the health or sexual life or sexual orientation of personnel. - possibly further categories of data, including particular ones, such as, by way of example, a) data relating to personality, tastes, preferences, opinions and life and consumption habits which may be collected by completing questionnaires to which the User will be invited to participate freely; B) photo, date of birth, gender, education, occupation and interests, subsequently and optionally filled in by the user to complete their profile.

The questionnaires can be aimed, as mentioned, at the collection of particular categories of data pursuant to art. 9 of European Regulation (EU) 679/2016 (i.e. data suitable for detecting racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to identify uniquely a natural person, data relating to the person's health or sexual life or sexual orientation).

Finally, other Data relating to the User's personal details or the User's technical access methods to the Site or Mobile Apps may also be collected.

Furthermore, the collection and display of personal data depends on the type of access to the Smart Research srl platform and the user's choices in using the web platform or a mobile app. Listed below are a series of features that involve the collection and use of personal data.

When you use our Apps, we may collect some information such as the type of device or operating system you are using. Furthermore, the App asks if you want to receive push notifications. If you accept, you can always disable them directly from the operating system at any time. We do not currently track any geolocation information when you use our App.

#### Data retention period

We keep the data collected as long as it is necessary to provide our services and until the User decides to cancel their subscription to Smart Research srl.

In any case, Smart Research srl reserves the right to retain the data processed for the exercise of its rights deriving from the service provided or from conservation needs connected to legal obligations, such as, by way of example and not limited to: tax, accounting obligations, relating to labor legislation.

#### Revocation of consent and exercise of other User rights

The user can at any time revoke his consent to the processing of the data provided, in accordance with and within the limits of the provisions of the art. 7, paragraph 3 and 13, paragraph 2, letter. c) GDPR.

The right of revocation is exercised, without prejudice to the lawfulness of the Processing carried out on the basis of the consent initially given, by unsubscribing from the service at any time by communicating the intention to revoke the consent to the email address [cancelami@smartresearch.it](mailto:cancelami@smartresearch.it) or [info@smatresearch.it](mailto:info@smatresearch.it)

Furthermore, at any time the User may exercise the rights provided for by the national and European legislation on the protection of personal data and, in particular, by the European Regulation (EU) 679/2016 towards Smart Research srl, pursuant to the articles 15, 16, 17, 18, 20, 21 of the same Regulation, which confer specific rights.

In particular, the User has the right:

- i) to ask the Data Controller for access to the data concerning him, based on the provisions of the art. 15 of the GDPR. In particular, you will be able to obtain confirmation of the existence or otherwise of personal data concerning you, the purposes on which the processing is based, the recipients or categories of recipients to whom the personal data have been or will be communicated, the retention period of the personal data envisaged or, if it is not possible to identify this period, the criteria used to determine this period; the existence of the right of the interested party to ask the data controller to rectify or delete personal data or limit the processing of personal data concerning him or to oppose their processing; the right to lodge a complaint with a supervisory authority; if the data are not collected from the interested party, all available information on their origin; the existence of an automated decision-making process, including profiling; the existence of adequate guarantees in the event that personal data are transferred to a third country or to an international organisation. The interested party has the right to receive a copy of the personal data being processed;
  
- ii) to request the rectification or integration of data in accordance with the provisions of the art. 16 of the GDPR;
  
- iii) to request the deletion of the data in accordance with the provisions of the art. 17 of the GDPR;
  
- iv) to request the limitation of the processing of your data, based on the provisions of the art. 18 of the GDPR;
  
- v) to exercise your right to data portability, pursuant to art. 20 of the GDPR, receiving your personal data in a structured format commonly used and readable by an automatic device and to transmit such data to another data controller without impediments;

The exercise of the aforementioned rights can be exercised through the settings relating to the User account present on the Smart Research srl website or the interested party can contact the Data Controller by email, at [info@Smartresearch.it](mailto:info@Smartresearch.it), who guarantees the correct exercise of the same, in accordance with the provisions of the GDPR.

The User also has the right to lodge a complaint with a supervisory authority if he believes that the processing of his data violates the GDPR.

#### Right of opposition

Pursuant to art. 21 of the GDPR, the User also has the right to exercise the right to object, at any time, for reasons related to his particular situation, to the processing of personal data concerning him in cases where the processing is carried out to pursue a legitimate interest of Smart Research srl or third parties, unless SMART RESEARCH SRL demonstrates the existence of compelling legitimate reasons to proceed with the processing which prevail over the interests,

rights and freedoms of the interested party or for the establishment, exercise or defense of a right in court.

#### Consequence of failure to communicate data

The provision of the User's data is necessary for the use of the services provided by Smart Research srl, as described in this Information and the Term & Conditions. The provision of data is therefore optional, however any refusal to provide the data requested for registration purposes will make it impossible to provide the requested service.

The remaining personal data shared by the user as part of the activities provided by Smart Research srl are optional.

To use particular services, Smart Research srl may request the communication of certain personal data necessary for the provision of the same optional services.

#### Profiling

The User's Data is collected, among other things, for possible User profiling to allow Smart Research srl to direct its customers' investigations into the Smart Research Community in the best possible way.

We internally perform statistical and other analyzes on the information we collect (including usage data, device data, referral data, question and answer data to analyze and measure user behavior and trends, to understand how people use the our services and to monitor, troubleshoot and improve our services, as well as to help us design new features).

#### Notifications and invitations

By registering with Smart Research srl, the user:

- 1) accepts the possibility of receiving e-mail messages to freely participate in surveys or consultations based on your profile; agree to be invited via email notification or mobile app to respond to surveys or Smart Research srl pages;
- 2) agree to receive other types of email notifications related to the use of the service;
- 3) accepts to receive invitations via email to opinion polls carried out directly by Smart Research srl or by third parties, via the Smart Research srl or third party platform.

The user's email address, collected during registration, is treated confidentially by Smart Research srl and is not shared under any circumstances with third parties who may make use of the above-listed services made available by Smart Research srl, without however knowing the personal data of Smart Research srl Users.

#### Treatment methods

The Data Controller Smart Research srl processes the Data of Interested Parties and Users in a lawful and correct manner and adopts appropriate security measures aimed at preventing unauthorized access, disclosure, modification or unauthorized destruction of the Data, according to the principles of accountability provided for by the GDPR .

The processing is carried out using IT and/or telematic tools, with organizational methods and with logic strictly related to the purposes indicated.

In addition to the owner, in some cases, categories of persons in charge involved in the corporate organization of the Site (administrative, commercial, marketing, legal, system administrators) or external parties (such as third-party technical service providers, postal couriers) may have access to the Data. , hosting providers, IT companies, communication agencies) also appointed, if necessary, as Managers by the Data Controller. The updated list of Managers can always be requested from the Data Controller by contacting the address indicated.

The Data is processed at the headquarters of the Data Controller. Furthermore, the data is stored, processed, transferred or disclosed in the countries where the offices of Smart Research srl are located and in the countries where the offices or servers of our hosting service providers are located.

The user acknowledges and accepts that the processing of Data may take place outside the member countries of the European Union, in line with what is specified in the Privacy Policy always in compliance with internal, European and international regulations on the protection of Personal Data.

Smart Research srl has put in place the necessary physical and electronic measures to protect confidentiality and ensure the security of information provided by customers and users. These measures, adopted pursuant to Legislative Decree no. 196/2003 and European Regulation (EU) 679/2016, are designed to protect the paper and electronic documentation provided by anyone who has relationships with Smart Research srl.

The physical and electronic measures will be constantly updated, in compliance with the provisions of the Personal Data Protection Code and the European Regulation (EU) 679/2016 as well as national and international best practices.

Smart Research srl, whose contact details have been indicated above, is the custodian of the registration data, accounting data and other profile information that we collect.

Through your use of our Services, you agree to comply with our collection security requirements and use of the data collected taking advantage of the possibility of creating surveys, such as the requirements aimed at informing participants about the specific use and disclosure of their data.

#### Cookies

Cookies are data that we store on devices that you can use to access our services so that we can recognize users. We use cookies for several reasons:

- To make our site easier to use
- To verify your identity, to confirm if you are connected to Smart Research srl.
- To provide you with personalized content (e.g. the user's preferred language).
- To improve our services.



Smart Research srl uses the information collected alone or in combination with other information to improve our capabilities to provide relevant content to our users and develop increasingly useful features.

We also collect usage data every time you use our services: e.g. web pages you visit, elements you click on, when you carry out these types of actions and other information. To pursue the same purposes, our servers store information relating to access to our services. We collect data from the device and application you use to access our services, such as your IP addresses and the type of browser you use.

By registering directly or through the use of the Facebook account, the User agrees to provide their Data for the execution of the services provided and/or for the purchase of the services provided on the Smart Research Website or mobile App. srl and for the other purposes described in this information.

By using our websites and accepting this privacy policy, you expressly consent to the use of cookies as set out in our policy.

In addition to using cookies directly, we have implemented some Google Analytics features on our websites. Google Analytics is a web analytics service provided by Google, Inc. ("Google") which uses "cookies" through which it collects the user's browsing data which are transmitted and stored on Google servers in the United States. Google uses this information for the purpose of tracking and examining the use of the Site, compiling statistical reports and providing other related services