



# Data Protection and Cookie Disclosure

## I. Data Protection Disclosure

**SARDU Pro S.r.l.**, an Italian company with registered office at Via Vincenzo Bellini 9, Cagliari, Italy (hereinafter, SARDU Pro), in compliance with the obligations arising from Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, hereinafter GDPR) and Italian legislation on data protection, abides by and protects the confidentiality of users of the site on the sardu.pro domain, making every possible and proportionate effort so as not to harm the rights thereof.

The purpose of this data protection disclosure is to help users understand the procedures that SARDU Pro uses in terms of data protection, including which personal data is collected, the reason for data collection, how it is used, how such data is protected and what users' individual rights are.

This data protection disclosure does not apply and removes liability on our part with respect to data protection, information or other practices by third parties, including third parties that manage websites or services to which the sardu.pro site refers.

This data protection disclosure applies to all personal data acquired or processed by SARDU Pro when users interact with the sardu.pro site, for example by buying and using our software, *SARDU MultiBoot Creator* (hereinafter *SARDU software*) and our services, by contacting SARDU Pro customer service or by responding to marketing communications. These interactions may involve visitors, customers, suppliers and/or partners.

## II. General information on data processing

In this data protection disclosure, the term, "personal data", means information referring to users and that allows us to identify them, either directly or in combination with other information possessed by us.

### ***Users of the website in general***

SARDU Pro processes users' data based on consent. By using the *SARDU software* and using or consulting its website, users explicitly approve of this data protection disclosure and consent to the processing of their personal data in relation to the purposes and procedures described below, including any dissemination to third parties if necessary for the provision of a service. The provision of data and therefore consent to the collection and processing of data is optional. The user may deny consent and may revoke consent already given at any time. However, denying consent may make it impossible to provide certain services, such as updating and terminating the operation of *SARDU software*. Browsing on the site would be compromised.

SARDU Pro reserves the unquestionable right to cancel and block users, therefore also for related *SARDU software*, who use emails that are fake, bounce or harm the reputation of the domain, users who breach the general rules of *netiquette* or users who directly or indirectly harm the company itself.



## **SARDU Software Customers**

SARDU Pro shall do everything possible, in accordance with the electronic format of the services, to maintain absolute confidentiality in the performance of services. Customers' personal data communicated for the purpose of registering to the site and any information sent by the customer including through the *SARDU software* to SARDU Pro shall be subject to utmost confidentiality and collected personal data shall be processed in accordance with Article 6 of the GDPR.

In particular, SARDU Pro shall use information provided for the purpose of using software to activate its license and allow updates. Without the prior written consent of the customer, SARDU may not disclose such information publicly or to third parties, with exception for its authorized collaborators or its authorized subcontractors, if their operations or advice makes knowledge of such information necessary. The aforementioned guarantees do not apply if SARDU Pro is required by law to communicate such information, or in the event that such information is or becomes public knowledge regardless of whether disclosed by SARDU Pro, or in the event that vital interests of the data subject or another natural person make it necessary to process personal data, or if processing is necessary for the protection of a legitimate interest of SARDU Pro or third parties, which prevails over the rights of the data subject.

### **III. Information collected automatically. Browsing data**

Like all websites, this site also uses log files storing information collected in an automated manner during user access. The information collected may be the following:

- internet protocol address (IP);
- browser type and parameters of the device used to connect to the site;
- name of the internet service provider (ISP);
- date and time of access/request;
- possibly the number of clicks
- method used to submit the request to the server;
- the size of the file obtained in response;
- the digital code stating the response status given by the server;
- and other parameters relating to the operating system and the user's computer environment.

The above information is processed in an automated manner and collected solely in an aggregated form in order to verify the correct functioning of the site, and for security reasons. For security purposes (spam filters, firewalls and virus detection), automatically recorded data may also include personal data such as IP address (the one uniquely identifying, at least at that given moment, the respective host), which may be used, in accordance with the relevant laws in force, for the purpose of blocking attempts to harm the site itself or to cause harm to other users, or in any case harmful activities or offences. This data is used to protect the site and its users.

The indicated data is used only to obtain anonymous statistical information on the use of the website and to check its correct operation. As such, it is deleted immediately after processing. Data used for security purposes (blocking of attempts to harm the site) is kept for seven days.



## **IV. Use of Cookies**

### ***Definition of cookie***

A cookie is a small text file sent to the browser by the visited website subsequently stored on the hard disk of the user's computer. When connecting again to the website, cookies are read and recognized by the website that sent them. While accessing a website, it is possible to receive cookies from a third-party website (so-called “third-party cookies”), for example links to the web pages of other domain names.

Cookies may be used for different purposes: to allow a website to recognize the user’s device, monitor sessions and store specific information about users accessing the server.

### ***Types of cookies***

Technical cookies: these are necessary for the website to function correctly and to allow the user to use the service.

Functional cookies: these are used to facilitate browsing on the website, to store selected settings and to provide customized features.

Analytical cookies: the website uses this type of cookie to collect information on usage habits, the pages visited and any errors that may occur during browsing. These cookies do not collect information that may identify the user’s computer. All information collected by these cookies is aggregated and therefore anonymous.

By using the site, the visitor expressly consents to the use of cookies.

### ***Disabling cookies***

Cookies are linked to the browser used and may be disabled at any time directly from the browser, thereby refusing/revoking consent to the use of cookies. It is noted that disabling cookies may prevent the proper use of some features of the site itself.

Each browser has a different procedure for managing settings. Find below the specific instructions for each browser:

- [How to manage cookies on Internet Explorer](#)
- [How to delete cookies on Internet Explorer](#)
- [How to manage cookies on Firefox](#)
- [How to delete cookies on Firefox](#)
- [How to manage cookies on Chrome](#)
- [How to manage cookies on Safari Web and iOS](#)

### ***Third-Party Cookies***

This site also acts as an intermediary for third-party cookies, used to provide additional services and features to visitors and to improve the use of the site itself, such as links for social media. This site



has no control over third-party cookies, entirely managed by third parties. As a result, information on the use of third-party cookies, on their purposes, as well as on the procedures for disabling them, are provided directly by third parties on the pages stated below.

## **V. Social Networks**

This site also incorporates plugins and/or links for social networks, in order to allow easy sharing of content on your favorite social networks. These plugins are programmed so as not to set any cookies when accessing the page, to safeguard user privacy. Cookies are set if necessary, if required by social networks, only when the user makes an actual, voluntary use of the plugin. Note that if a user browses while logged onto a social network then he or she has already consented to the use of cookies conveyed through this site when registering to the social network.

The collection and use of information obtained through the plugin are governed by the respective data protection policies of social networks, to which you are asked to refer.

- [Facebook](#)
- [Twitter](#)
- [LinkedIn](#)

## **VI. Emails and Newsletters**

The user may receive e-mails from SARDU Pro in various ways, such as for confirmation of registration, an order or confirmation of subscription to the newsletter, or to receive information on SARDU Pro services.

A user may object to these types of processing by accessing the address, [www.sardu.pro](http://www.sardu.pro), for example by modifying his or her online profile or by cancelling his or her subscription to our Newsletter, or by contacting the Data Controller at the address below.

## **VII. Place of data processing**

The data collected from the site is processed on the Data Controller's premises and at the web hosting data center. [AWS](#) web hosting, which is the data processor on behalf of the Data Controller, is in the European Economic Area and acts in compliance with European standards.

## **VIII. Transfer of data to non-EU countries**

This site may share some of the data collected with services located outside the European Union area. In particular, with Google, Facebook and Microsoft (LinkedIn) through social plugins and the Google Analytics service. The transfer is authorized based on specific decisions of the European Union and the Italian Data Protection Authority, in particular decision 1250/2016 (Privacy Shield), for which no further consent is required. The companies mentioned above guarantee their adherence to the Privacy Shield.

## **IX. Security measures**

This site processes users' data in a lawful and correct manner, taking appropriate security measures to prevent unauthorized access, disclosure, modification and destruction of data. Processing is carried out using IT and/or electronic tools, using appropriate measures at an organizational,



technical and administrative level in order to protect personal data within our company, and based on reasoning strictly related to the purposes indicated. However, no data transmission and no storage system can be guaranteed to be 100% safe. Users who have reason to believe that interaction with us is no longer secure, are asked to immediately report the problem to us.

In addition to the Data Controller, in some cases, categories of supervisors involved in the organization of the site (administrative, commercial, marketing or legal staff or system administrators) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies or communication agencies) may have access to Data. If necessary, Data Processors are also appointed by the Data Controller.

Users' personal data shall be kept for the time necessary or allowed in light of the purposes for which they are collected. The criteria adopted to determine the storage times are the following: (i) the period of time for which users regularly use the sardu.pro site; (ii) the need to fulfil the contract or a legal obligation to which we are subject; (iii) the appropriateness of storing data in light of our legal situation (for example, with reference to statute of limitations, disputes or regulatory compliance checks).

## **X. User rights**

Pursuant to the GDPR and Italian legislation, according to the procedures and within the limits established by current legislation, users may exercise the following rights in relation to respective personal data:

- to request confirmation of the existence of personal data concerning them (right of access);
- to discover the origin thereof;
- to receive an intelligible communication thereon;
- to obtain information on the reasoning, methods and purposes of the processing;
- to request the updating, rectification, amendment, erasure, anonymization and blocking of data processed in violation of the law, including that no longer necessary to achieve the purposes for which they are collected;
- in the event of processing based on consent, to receive respective data provided to the holder, only based on the cost of any media, in a structured, machine-readable format commonly used by an electronic device;
- the right to file a complaint with the Supervisory Authority.
- As well as, more generally, to exercise all rights that are recognized by current legal provisions.

Requests must be addressed to the Data Controller. In particular, users may exercise their rights in relation to the processing of their personal data by going to the address, [www.sardu.pro](http://www.sardu.pro), for example by modifying their online profile, by cancelling their subscription to our Newsletter, or by contacting the Data Controller at the address below. We will respond to the request in accordance with the laws in force. Users are asked to indicate in their request which personal data they wish to have changed, to let us know if they prefer such data to be removed from our database or to specify which limitations they wish to place on our use of their personal data. It is important to note that we may need to keep certain information for registration purposes and/or to complete transactions initiated by users before requesting a change or cancellation.



## **XI. Special information for parents**

The sardu.pro site is not intended for children, as set forth by applicable laws, and we do not knowingly collect personal data from children. In any case, SARDU Pro undertakes to comply with the provisions of the law when requiring the authorization of a parent or guardian to collect, use or disclose the personal data of minors. We are committed to protecting the privacy of children and we encourage parents and guardians to play an active role in the activities and interests of their children online.

If a parent or guardian learns that a minor child has provided us with his or her personal data without his or her consent, please contact the data controller at the address below. If we become aware that a child has provided us with his or her personal data, we will remove it from our records.

## **XII. Data Controller**

The Data Controller in accordance with the GDPR and other Italian data protection laws, as well as other data protection provisions, is SARDU Pro S.r.l., Via Bellini 9, 09128, Cagliari, Italy, which may be contacted at the following e-mail address: [info@sardu.pro](mailto:info@sardu.pro). [info@sardu.pro](mailto:info@sardu.pro).

The Data Processor is AWS web hosting.

## **Data Protection Officer (DPO)**

SARDU Pro has appointed Mr. Davide Costa as Data Protection Officer (DPO). The Data Protection Officer (DPO) may be reached at the following address: [davide@sardu.pro](mailto:davide@sardu.pro).

## **XIV. Updates**

This privacy policy is up-to-date as of 23 April 2019.