



## Privacy policy

This page describes the procedures for managing websites owned by Interzen Consulting S.r.l.

- Interzen institutional website (<https://www.interzen.it>)
- ZenShare product site (<https://www.zenshare.it>)
- Landing-pages (under domain <https://www.zenshare.it>)

and the web applications provided by the same through the owned software platform

- ZenShare (<https://cloud.zenshare.it>)

with reference to the processing of personal data of users who navigate websites/landing pages and/or use the web applications of the proprietary software platform.

This is an information note issued according to European Regulation 679/16 (GDPR, General Data Protection Regulation).

The information is provided only for websites/landing pages and the proprietary software platform previously listed and not for other websites that may be navigated by the user through links contained in the aforementioned websites.

By visiting websites/landing pages indicated above and using the proprietary software platform, you implicitly accept the practices described in this Privacy Policy.

## 1. Processed data

### a. Data supplied by users

Personal data provided by users who request informative and/or commercial material are used only for the purpose of making such communications or the requested service (price quotation, economic offer, drafting of another type of document, demonstration of the proprietary software platform) and kept for the period of execution of this service plus legal terms.

Collected data are those entered by the user through the contact forms available online (contact pages on the sites [www.interzen.it](http://www.interzen.it) or [www.zenshare.it](http://www.zenshare.it), landing-pages) forms that provide access to this information and collect the free consent to data processing.

The optional, explicit and voluntary sending of e-mail messages to e-mail addresses with domains "@interzen.it" and "@zenshare.it" or the phone contact (also optional, explicit and voluntary) to the main company number or to other Interzen phone numbers triggers the acquisition of both the sender's email address/telephone number of the caller (in order to reply to sent requests), and any other personal data included in the message or communicated by telephone.

### b. Data collected automatically

Interzen collects the following data from its own websites or from the web applications provided through its ZenShare suite:

- technical data: IP address, network location, network domain, location.
- data collected using cookies or similar technologies: for more information, please visit the Cookies section.

## 2. Use of processed data

### a. Enable the use of services (commercial purpose)

These treatments are fundamental to provide services from the proprietary software platform to users who have purchased the service.

These treatments are based on the contractual relationship between the data subject and the data controller.

### b. Send informative and/or commercial material (commercial purpose)

These treatments are fundamental for sending information and/or documents requested by users through the contact forms available online on the internet/landing pages owned by Interzen Consulting S.r.l.

Such processing is based on the legitimate interest of the Data Controller, and the Data Owner may at any time withdraw his consent.

### c. By consent, send marketing updates regarding the company/product after the first contact phase (marketing purposes)

Data collected, if the data owner has explicitly given his consent to the processing, are processed for the purpose of sending updates and promotions of potential interest. In detail, data are used for:

- communicate promotional, commercial and advertising activities on events, initiatives and products through paper mail, e-mail, SMS or push notifications;
- perform analysis and reporting activities related to promotional communication systems, such as - for example - detection of the number of open e-mails, clicks made on the links shown in messages, type of device used to read communications and the related operating system or the list of unsubscribe requests from the newsletter.

### d. With previous consent, offer a customized service (profiling purposes)

Collected data are processed, if the interested party has explicitly given his consent to the processing, to analyze areas from Interzen's commercial offer to which he shows great interest while browsing Interzen's websites, in order to enhance online information shown to website visitors and to improve Interzen's business offer.

These analyses in any case are not related to any automated decision-making process.

### 3. Freedom for users to provide their personal data

Apart from what has been specified for navigation data, the user is free to provide personal data requested in application forms or indicated in contact pages to obtain business informations (commercial purposes).

Refusing to provide such data may make it impossible to obtain what has been requested.

On the other hand, providing such data is optional for marketing and profiling purposes and any refusal to give consent does not have negative consequences on requests for sending information for commercial purposes.

#### a. Subject for processing personal data

Data controller is:

Interzen Consulting S.r.l.  
legal representative Francesco Alfieri  
Piazza Ettore Troilo, 18 (Complesso Accademia)  
65127 - Pescara  
C. F. and VAT number IT01446720680

The data controller has internal staff and/or data processors to achieve the specified purposes, properly trained on the protection of personal data.

The cancellation of personal data (right to be forgotten, art.17) can be obtained by the interested party in these 3 ways:

1. Sending the request to the data controller by e-mail to the e-mail address **info@interzen.it**;
2. Sending the request to the holder of the treatment by mail to the address specified above;
3. By setting "I do not consent" in the 3 areas of consent to the processing of personal data (commercial, marketing, profiling) available in the "consent management page" whose access link is shown in the newsletter and direct-marketing campaigns sent by Interzen Consulting S.r.l.

**Requests for cancellation of personal data will be processed by the end of the month following their receiving date.**

## b. Other subjects to which personal data may be disclosed

Data collected during provisioning of ZenShare Suite services can be communicated to:

- companies closely connected and instrumental to operations - including technical ones - related to Interzen's services, such as - but not limited to - suppliers and partners providing services to review and verify ads, direct service providers for marketing and customer care services, companies dealing with archiving services, digital preservation of fiscal, administrative, payment and invoicing documents;
- public offices and administrative authorities by virtue of legal obligations.

Personal data of the data owner:

- are not transferred outside the European Union;
- in no case will be transferred or sold to third parties.

## c. The interested party can exercise his rights according to the laws.

Anyone whose personal data is treated by Interzen has the right to:

- obtain from the data controller, at any time, information about the existence of their personal data, their origin, purposes and methods of treatment and, if existent, access to personal data and information;
- request the update, rectification, integration, deletion, limitation of data processing if one of the conditions shown in Article 18 of the European Regulation 679/16 (GDPR), such as the transformation into anonymous form or the blocking of personal data, or data processed violating the law, including those that do not need to be treated according to purposes for which data were collected and/or subsequently processed;
- dispute, in whole or in part, for legitimate reasons, the processing of data, even if pertinent to the purpose of collection, and the processing of personal data provided for the purposes of commercial information, advertising material, direct selling or market research; each user has also the right to withdraw consent at any time without prejudice to the lawfulness of the treatment based on the consent given previously to its revoking;
- receive its personal data, as applicable, previously provided knowingly and actively or through the use of the ZenShare Suite services, in a structured format, commonly used and readable by automatic device, and transmit them to another data controller without impediments;
- propose a complaint to the Italian Data Protection Authority.

To exercise the rights listed above, please send your request:

- by email at [info@interzen.it](mailto:info@interzen.it)  
or
- by mail to the address specified above.

**d. Personal data of the interested party will be kept for the time necessary for the purposes stated**

The retention of personal data will be on paper and/or digital devices and for the time strictly necessary to satisfy the purposes set out in the previous points, in compliance with current regulations.

**Commercial purpose.** In case of requests forwarded for sending informative material, personal data will be kept for a period of 10 years; whereas the sending of informative material follows a contractual relationship between the interested party and Interzen, personal data will be kept for the entire period of service delivery, extended by 10 years (data retention period for commercial purposes).

**Marketing purposes.** Personal data of the interested party are kept for a maximum period equal to that envisaged by the applicable law, 2 years.

**Profiling purpose.** Personal data of the interested party are kept for a maximum period equal to that that envisaged by the applicable law, 1 year.

Invoices, accounting documents and transaction data are stored for 11 years under the law (including tax obligations).

For the same purposes, data relating to electronic traffic - excluding communications contents in any case - will be kept for a period of no more than 6 years from the date of communication, pursuant to art. 24 of the Law n. 167/2017, which implemented the EU Directive 2017/541 on anti-terrorism.

## 4. Protection of personal data

Data are collected by the data controller, according to the indications from the actual legislation, with particular regard to the security features requested by the European Regulation 679/16 (GDPR, General Data Protection Regulation) for processing by computerized, manual and automated tools and with logic strictly related to the purposes indicated, and in order to guarantee security and confidentiality of data.

## 5. Management of cookies and similar technologies

### a. What are cookies

Cookies are small text files that the sites visited by users send to their devices, where they are stored to be transmitted again to the same sites during following visits.

Cookies (and/or similar technologies such as SDK technologies for the mobile world) can be stored permanently (persistent cookies) on the user's device or have a variable duration; they can in fact be deleted by closing the browser or having a duration limited to the single session (session cookies).

Cookies can be installed by Interzen (first-party cookies) or by other websites (third-party cookies).

Cookies are used for different purposes as better specified below.

For profiling activities, personal data collected through cookies are processed for a maximum period of 1 year from the time when consent to treatment is given. Below are all the informations on cookies installed through Interzen websites and/or related applications and the necessary instructions on how to manage your preferences regarding them.

**b. Cookies used: first party cookies and their purposes**

- **Technical.** Cookies are used for purposes related to the provision of the service. These cookies are essential to guarantee the proper functioning of the platform and to memorize the acceptance of the use of these cookies.

**c. Cookies used: third party cookies and related purposes**

- **Analytcs.** Collect statistics regarding navigation on websites owned by Interzen Consulting S.r.l. (institutional website Interzen - <https://www.interzen.it>, ZenShare product site <https://www.zenshare.it>, landing-pages - with domain <https://www.zenshare.it>) and web applications provided through the ZenShare proprietary software platform.  
*Third parties: Google Analytics (<https://policies.google.com/privacy?hl=it>)*
- **Performance.** Through these cookies it is possible to improve use and control of user access to web applications provided through the proprietary ZenShare software platform, as well as to improve the browsing experience of the internet websites owned by Interzen Consulting S.r.l.  
*Third parties: Google Analytics (<https://policies.google.com/privacy?hl=it>)*
- **Profiling.** Analyzing online navigation on websites owned by Interzen Consulting S.r.l. it is possible to provide web content and commercial offers in line with the user's interests, based on his previous browsing experience too. This information is coupled with the identification data held by Interzen.  
*Third parties: Google Adwords (<https://policies.google.com/privacy?hl=it>)*

The use of these technologies is ruled by privacy policies of this company and not by Interzen's privacy policy.

**d. How the consent (opt-in) is provided to the use of cookies**

The consent to the use of third-party cookies is provided by the user on the websites owned by Interzen Consulting S.r.l. through the following methods:

- clicking on the banner button;
- scrolling the page hosting the banner for more than 200 pixels.

In the ZenShare proprietary software platform, technical cookies and third-party cookies do not require consent, so they are installed automatically after user's access.

**e. How to revoke (opt-out) consent to the use of cookies**

Cookies can be totally disabled in the browser using the appropriate function provided.

It is good to know, however, that by deactivating the technical cookies the ZenShare proprietary software platform cannot be used.

For information on the deactivation of cookies on the main browsers, refer to the respective online sites.