

I – PRIVACY POLICY OF THE WEBSITE

1. This section contains information on how to manage the sparkic.com website in relation to the processing of user data of the sparkic.com website.
2. This policy is also valid for the purposes of art. 13 of Legislative Decree no. 196/2003, Personal data protection code, and for the purposes of Article 13 of EU Regulation no. 2016/679, concerning the protection of individuals with regard to the processing of personal data and the free movement of such data, for persons interacting with the site sparkic.com and can be reached at the address corresponding to the home page: <https://www.sparkic.com>.
3. The policy is provided only for sparkic.com and not for other websites that may be consulted by the user through any links contained therein.
4. The purpose of this document is to provide information about the modalities, timing and nature of the information that data controllers must provide to users when connecting to the web pages of sparkic.com, regardless of the purpose of the connection itself, according to Italian and European legislation.
5. The information may be subject to change due to the introduction of new regulations, in this regard, we therefore invite the user to check this page periodically.
6. If the user is under 16 years of age, pursuant to art. 8 paragraph 1 of EU Regulation 2016/679, he/she must legitimize his/her consent through the authorization of his/her parents or guardian.

II – DATA PROCESSING

1 – Data controller

1. The data controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
2. With regard to this website, the data controller is SPARK Innovation Catalysts Srl, and for any clarification or exercise of the user's rights, please contact him at the following e-mail address: privacy@sparkic.com.

2 – Data processor

1. The data processor is the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

2. Pursuant to art. 28 of EU Regulation 2016/679, upon appointment of the Data Controller, the data controller of the sparkic.com website is SPARK Innovation Catalysts Srl.

3 – Data processing location

1. The processing of data generated by the use of the sparkic.com website takes place at Via Mannelli, 185 - 50132 Florence - Italy.
2. If necessary, the data connected to a possible newsletter service may be processed by the data controller or by persons appointed by him/her for this purpose at his/her premises.

III – COOKIES

1 – Type of cookies

1. The sparkic.com website uses cookies to make the user's browsing experience easier and more intuitive. Cookies are small text strings used to store certain information about the user, their preferences or their internet access device (computer, tablet or mobile phone) and are mainly used to adapt the operation of the site to the user's expectations by offering a more personalized browsing experience and storing the choices made previously.
2. A cookie consists of a small set of data transferred to the user's browser by a web server and can only be read by the server that made the transfer. It is not an executable code and does not transmit computer viruses.
3. Cookies do not record any personal information and any identification data will not be stored. If desired, it is possible to prevent some or all cookies from being saved. However, in this case, the use of the site and the services offered may be compromised. To proceed without changing the options for cookies, simply continue browsing.

2 – Technical cookies

1. There are numerous technologies to store information on the user's computer, which is then collected by the sites. Among these, the best known and most widely used is that of HTML cookies. They are used for navigation and to facilitate access to and use of the site by of the user. They are necessary for the transmission of communications over an electronic network, i.e. to the provider to provide the service requested by the user.
2. The settings for managing or disabling cookies may vary significantly depending on the browser used. Usually the user can choose to generally deactivate or delete cookies by changing the security settings of their browser. Such deactivation may slow down or prevent access to certain parts of the site.

3. The use of technical cookies allows the safe and efficient use of the site.
4. Cookies that are inserted in the browser and retransmitted through Google Analytics or through the statistical service of bloggers or similar can only be considered technical if they are used to optimize the site directly by the site owner, who can collect information in aggregate form on the number of users and how they visit the site. Under these conditions, the same rules on information and consent apply to Analytics cookies as to technical cookies.
5. From the point of view of duration, we can distinguish temporary session cookies that are automatically deleted at the end of the browsing session and are used to identify the user and thus avoid the login to each page visited and permanent cookies that remain active in the PC until expiry or cancellation by the user..
6. Session cookies may be installed in order to allow access and stay in the reserved area of the portal as an authenticated user.
7. They are not stored permanently but only for the duration of the navigation and until the closure of the browser and are deleted when the browser is closed. Their use is strictly limited to the transmission of session identifiers consisting of random numbers generated by the server necessary to allow the safe and efficient exploration of the site.

For further information regarding the management of cookies in the browser configuration, the cookies used by the most common search software and other news, visit the page of this website dedicated to the regulation and management of cookies under "Cookies" in the final bar of the home page.

IV – PROCESSED DATA

1 – Data processing modality

1. Like all websites, this website also makes use of log files in which information collected automatically during users' visits is stored. The information collected may include the following:
 - Internet protocol address (IP address)
 - Type of browser and device used to connect to the site
 - Name of internet service provider (ISP)
 - Date and time of visit
 - Web page of origin of the visitor (referral) and web page of exit
 - Possibly the number of clicks
2. The above information is processed in an automated form and collected in an exclusively aggregated form in order to verify the correct functioning of the site, and for security reasons. This information will be processed according to the legitimate interests of the data controller.

3. For security purposes (filters, anti-spam, firewall, anti-virus detections), the automatically recorded data may also include personal data such as IP address, which could be used, in accordance with the laws in force, to block attempts to damage the site itself or to cause damage to other users, or in any case harmful or criminal activities. This data is never used for the identification or profiling of the user, but only for the protection of the site and its users; this information will be treated according to the legitimate interests of the data controller.
4. If the site allows the inclusion of comments, or in the case of specific services requested by the user, including the possibility to send a curriculum vitae for a possible employment relationship or to make a simple request for information by e-mail, the site automatically detects and records certain user identification data, including email address.
Such data are considered voluntarily provided by the user at the time of the request for the provision of the service. By entering a comment or other information, the user expressly accepts the privacy policy and in particular agrees that the contents entered are freely distributed to third parties. The data received will be used exclusively for the provision of the requested service and only for the time necessary to provide the service.
5. The information that users of the site will consider making public through the services and tools made available to them, are provided by the user knowingly and voluntarily, exempting this site from any liability for any violations of the law. It is up to the user to verify that he or she has permission to enter personal data of third parties or content protected by national and international regulations.

2 – Purpose of data processing

1. The data collected by the site during its operation are used exclusively for the purposes indicated above and stored for the time strictly necessary to carry out the specified activities and in any case no longer than 10 years or according to the terms of the law in force.
2. In any case, the data collected by the site will never be provided to third parties, for any reason whatsoever, unless it is a legitimate request by the judicial authorities and only in the cases provided for by law.
3. The data used for security purposes (blocking attempts to damage the site) are kept for the time strictly necessary to achieve the purpose indicated above.

3 – User provided data

1. As indicated above, the optional, explicit and voluntary transmission of electronic mail to the addresses indicated on this site involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.
2. Specific summary information will be progressively reported or displayed on the pages of the site designed for particular services on request.

4 – Social networks plug-in

1. This site also incorporates plug-ins and/or pushbuttons for social networks in order to allow easy sharing of content on your favorite social networks. These plug-ins are programmed so that no cookies are set when you access the page to safeguard your privacy. Plug-ins are set, if so provided by the social network only when the user makes effective and voluntary use of the plug-in or button. Keep in mind that if the user is logged into the social network, then he or she has already consented to the use of the cookies transmitted. through this site when subscribing to the social network.
2. The collection and use of information obtained through the plug-in is governed by the respective privacy policies of each social network. More information on the specific policies of the main social networks can be found in the "Cookies" section accessible from the home page of this site.

V – USER RIGHTS

1. Article 13 paragraph 2 of EU Regulation 2016/679 lists the user's rights..
2. User rights can be summarized as follows:
 - Right of the data subject to request from the data controller access to his/her personal data (art 15 EU 679/2016), their updating (art 3 paragraph 3 letter a Legislative Decree 196/20013), rectification (art 16 EU 679/2016), integration (art 7 paragraph 3 letter a Legislative Decree 196/2003) or limitation of the processing concerning him/her (art 18 EU 679/2016) or to object, for legitimate reasons, to the processing itself (art 21 EU 679/2016), in addition to the right to data portability (art 20 EU 679/2016).
 - Right to request cancellation (art 17 EU 679/2016), transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed (art 7 paragraph 3 letter b Legislative Decree 196/2003).
 - Right to obtain certification that the operations of updating, rectification, integration of data, cancellation, blocking of data, transformation, have been brought to the attention of those to whom the data were communicated or disseminated, unless this requirement proves impossible or involves the use of means clearly disproportionate to the protected right (art. 7 paragraph 3 letter c Legislative Decree 196/2003).
3. Requests may be addressed to the data controller without any formality or, alternatively, using the form provided by the Data Protection Authority or by sending an email to privacy@sparkic.com.
4. If the processing is based on Article 6 paragraph 1 letter a "express consent to the use" or on Article 9 paragraph 2 letter a "express consent to the use of genetic, biometric, health-related data revealing religious or philosophical beliefs or trade-union membership which reveal racial or ethnic origin, political opinions" the user has the right to withdraw consent at any time without prejudice to the lawfulness of the processing based on consent given before the withdrawal.

5. In case of violation of the law, the user has the right to lodge a complaint with the Data Protection Authority, as the authority responsible for monitoring the processing in the Italian state.
6. It is understood that all the rights listed and their exercise are subject to the provisions of the regulations in force.
7. For further information on the user's rights, please refer to art. 15 and following articles of EU Regulation 2019/679 and art. 7 of Legislative Decree 196/2003.
8. The full text of the General Data Protection Regulation (GDPR UE679/2016) can be consulted on the website of the Data Protection Supervisor at the following address:
<https://www.garanteprivacy.it/il-testo>.

VI – DATA SECURITY

1. This site processes user data in accordance with current legislation, taking all measures to ensure that the data is not accessed, disclosed, modified or destroyed without authorization. The processing of data is carried out using IT tools and organisational methods suitable for achieving the purposes indicated.
2. In addition to the data controller, other persons involved in the management of the site (administrative, legal, IT personnel) as well as external parties (service providers, technicians, couriers, etc.) may have access to the data. It will be the responsibility of the data controller to bind these subjects to compliance with the regulations.

VII - REVISIONS TO THIS DOCUMENT

1. This document outlines the privacy policy of this site..
2. This document may be subject to revisions, changes or updates. Users are therefore invited to visit this page regularly.
3. The document was updated on September 2019.

September, 2019

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