



Computer Consultant Company



Traceability Available on Your Mobile

Privacy Policy

Introduction

Dick Trace is a computer consultancy startup that mainly deals with traceability, the first product is eatTrace.com which takes care of bringing food traceability to your mobile phone.

This Notice is intended to inform the user about the methods of processing personal data, by accessing the website www.eatTrace.com and downloading the associated app.

Dick Trace, in line with Legislative Decree 196/2003 (hereinafter " **Privacy Code** ") coordinated with Legislative Decree 101 2018 and Regulation (EU) 2016/679 (hereinafter " **GDPR** "), aims to guarantee the privacy and security of the personal data of each visitor and of the companies consistently with the provisions of this Notice.

This information is intended as information pursuant to art. 13 of the Privacy Code and Articles 12, 13, 14 and 21 of the GDPR.

Type of data processed

The data processed and made public are mainly those of the company and products of the companies. The goal is to create transparency in the food chain and therefore the data made public are those relating to products: name, identification number, type and sector companies: name, geographic location, company website, etc ..

The website offers information and browsing content for all visitors. During the navigation of the site the Dick Trace can, therefore, acquire information on the visitor, in the following ways:

- *Navigation data*
The computer systems and software procedures used to operate this website acquire during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. In this category of data includes: IP addresses, browser type, operating system, the domain name and website addresses from which you have accessed the information on pages visited by users within of the site, the access time, the permanence on the single page, the analysis of the internal path and other parameters relating to the operating system and the user's IT environment.
- *Additional data categories*
This is all the personal data provided by the visitor through the site, for example: registering and / or accessing a reserved area and / or a service and / or participating in one of the initiatives launched by Dick Trace from alone or in partnership with third parties, by writing to a Dick Trace e-mail address to request information or by calling one of our numbers to have direct contact with customer service.
- This service can send push notifications to the User.
- Data relating to the geographical location of the User, in order to provide services based on the location itself.

- The User is responsible for the Personal Data to third parties or published SHARED using this service and warrant that you have the right to communicate or disseminate them, freeing the owner from any liability to third parties.

Purpose of the processing

PURPOSE	LEGAL BASIS
<p>The aim of the service is to make TRANSPARENT the food chain and thus make public and accessible to Consumer. It is necessary make public the product data , the data of the industry's products and those of related companies involved.</p> <p>These data are required for completion of the Contract.</p>	<p>The treatments put in place for these purposes are necessary for the fulfillment of contractual obligations and do not require a specific consent from the interested party.</p> <p>The contracts can also be concluded outside the www.eatTrace.com site, by sending us a contact request (for example, e-mail, telephone, personal). Also in this case the personal data will be processed for the stipulation of the contract and supply our products or services.</p>
<p>To provide the requested good and / or the service and manage the contracts perfected by the user, it is necessary to carry out the related administrative, accounting, tax and legal, as well as fulfill requests submitted by user.</p>	<p>Legal basis</p>
<p>Detect your experience of using our platforms, the products and services we offer and ensure the proper functioning of the web pages and their contents.</p>	<p>The treatments put in place for these purposes are based on a legitimate interest of the owner.</p>
<p>Send commercial communications relating to promotions and / or offers for which you may be entitled to benefit, in the interest of the Owner .</p>	<p>The treatments put in place for these purposes are carried out with the specific consent provided by the user, except for commercial communications relating to products and / or services similar to those already purchased and / or signed by the user for which the processing is based on a legitimate interest of the owner.</p>
<p>Perform profiling activities , ie analysis and processing of information relating to the user, his preferences, habits, consumption choices and / or browsing experiences. This activity is also carried out through the use of technologies such as cookies (for more information, look to " <i>Cookie Policy</i> " of this web site).</p>	<p>The processing operations performed for these purposes are carried out with the specific consent provided by the user, except for an analysis of elementary information relating to his consumption preferences.</p>

Circulation of data

The Data Controller safeguards the Personal Data Users, adopting appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data.

Processing is carried out using IT and / or telematic tools, with organizational methods and logic strictly related to the purposes indicated. In addition to the Owner, in some cases, categories of appointees involved in the organization of the site (administrative, commercial, marketing, legal, system administrators) or external parties (such as third party technical service providers, hosting providers, computer companies, communication agencies) also appointed, if necessary, Data Processors by the Owner.

Here are the categories of recipients of your personal data:

- If necessary, payment service providers and banks, in the payment regulations,
- IT service provider in the administration and hosting of our website or in the operation of our apps,
- Collection agencies and legal advisors to enforce our requests.

The updated list of Data Processors may always be requested from the Data Controller.

Data transfer outside the EU

Pursuant to art. 43 of the Privacy Code and of the art. 44 of the GDPR, Dick Trace could transfer your personal data to Third Parties located in countries outside the European Union or the European Economic Area.

In this circumstance, Dick Trace ensures the adoption of adequate guarantees (such as the signing of standard contractual clauses approved by the EU Commission) with the foreign company receiving the data; these clauses guarantee a level of data protection corresponding to that established by European legislation.

The roles and responsibilities in the field of privacy

Your personal data is processed by Dick Trace , as Data Controller.

More detailed information on the names of Data Processors may be requested by sending an email to the following address: privacy@dicktrace.com . We also inform you that a Data Protection Officer has been identified within Dick Trace and can be contacted at the following email address: dpo@dicktrace.com

Data processing methods

The processing of personal data is carried out, mainly using electronic procedures and supports (DB, CRM platforms, etc.) , for the time strictly necessary to achieve the purposes for which the data were collected and, in any case, in compliance with the principles of lawfulness, correctness, non-excessiveness and relevance provided for by the current privacy legislation.

Redirects to external sites

The website can use the so-called social plug-ins. The social plug-ins are special tools , which allow you to incorporate the social network features directly into the website (eg the "like" function of Facebook).

All social plug-ins on the site are marked by the respective logo owned by the social network platform (eg Facebook, Google, Twitter, LinkedIn).

When you visit a page on our site and interact with the plug-in (eg by clicking the "Like" button) or decide to leave a comment, the corresponding information is transmitted from the browser directly to the social network platform and memorized from this.

For information on the purposes, type and methods of collection, processing, use and storage of personal

data by the social network platform, as well as for the ways in which to exercise your rights, please consult the privacy policy adopted by the individual social network.

Connection to / from third party sites

From this website it is possible to connect, through appropriate links, to other websites of the companies participating in the project or it is possible from third party websites to connect to our website.

The Owner declines any responsibility regarding the possible request and / or release of personal data to third party sites and in order to manage the authentication credentials provided by third parties.

Data retention

We inform you that the data relating to the navigation logs, if recorded, will be kept by the Data Controller for a period of 3 months.

We also inform you that the data you provide will be processed for the entire duration of the existing contractual relationship between us and further preserved exclusively for the period provided for the fulfillment of legal obligations, provided that it is not necessary to keep them further for defend or enforce a right or to fulfill any further legal obligations or orders of the Authorities.

Rights of interested parties

The subjects to whom the aforementioned personal data refer (so-called "interested parties") have the right to exercise their rights in the manner and within the limits set by the current privacy legislation.

In relation to the processing of your personal data, you have the right to ask DickTrace:

- the **access** : can ask for confirmation whether or not to be a processing of data that concern it, in addition to further clarification about the information referred to in this Statement, as well as to receive the same data, within reasonable limits;
- the **rectification** : may request to rectify or supplement the data that you provided or in our possession, if inaccurate;
- the **cancellation / forgetfulness** : may request that your own data acquired or processed by Dick Trace are deleted if they are no longer needed for our purpose or where there are no disputes or litigation in place, in case of withdrawal of consent, or your opposition to treatment , in the case of unlawful processing, or if there is a legal obligation to cancel;
- the **limitation** : may request the limitation of the processing of your personal data, when one of the conditions referred to in art. 18 of the GDPR; in this case, your data will not be processed, except for storage, without your consent , except for what is stated in the same article in paragraph 2.
- the **opposition** : may at any time object to the processing of your data on the basis of our legitimate interest, unless there are our legitimate reasons for proceeding with the processing that prevails over yours, for example for the exercise or our defense on site judicial; its opposition will always and in any case prevail over our legitimate interest in processing your data for marketing purposes;
- the **portability** : can ask to receive your data, or to transmit them to another controller from your indication, in a structured format, of common use and readable by an automatic device.

Furthermore, pursuant to art. 7, par. 3, GDPR, we inform you that you can exercise your right to revoke your consent at any time, without jeopardizing the lawfulness of the processing based on the consent given previously.

Finally, we inform you that you have the right to lodge a complaint before the Control Authority, which in Italy is the Guarantor for the Protection of Personal Data.

To exercise these rights, report problems or ask for clarification on the processing of personal data, you can send an email to privacy@dicktrace.com. We also inform you that you can also send your requests by post, by writing to the Data Controller, Dick Trace srl Via Passo Godi, 21 65125 Pescara (PE) Italy, specifying the

subject of the request.

Changes to the Disclosure

The possible entry into force of new sector regulations, as well as the constant examination and updating of services to the user, could entail the need to modify the methods and terms described in this Statement. It is therefore possible that this document will change over time. We therefore invite you to consult this page periodically.

We will publish any changes to this Policy on this page and, if the changes are relevant, we will notify you with a more visible notification.

The previous versions of this Notice will, in any case, be archived to allow consultation.

Definitions and legal references

Personal Data (or Data)

Personal information is any information relating to a natural person, identified or identifiable, even indirectly, by reference to any other information, including a personal identification number.

Usage Data

They are the personal data collected automatically by this site (or by third-party applications that use the same), including: IP addresses or domain names of the computers used by the User that connects to this site, the notation addresses URI (Uniform Resource Identifier), the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response from the server (successful, error, etc.), the country of origin, the characteristics of the browser and of the operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details relating to the navigation followed within the site, with particular reference to the sequence of the pages consulted, to the parameters relating to the operating system and the IT environment of the User.

User

The individual who uses this site, which must coincide with the interested party or be authorized by this and whose Personal Data are object of treatment.

Interested

The natural or legal person to whom the Personal Data refers.

Data Processor (or Manager)

The natural person, legal person, public administration and any other entity, association or body which has the responsibility, including jointly with another owner, for decisions concerning the purposes, the methods of processing personal data and the tools used, including the profile of the safety, in relation to the operation and fruizione any of this site.

Data Processor (or Distributor)

The natural person designated to carry out data processing operations, which operates under the direct authority of the owner or manager in the context of the instructions given to him.

Data Controller (or Owner)

The natural person, legal person, public administration and any other entity, association or body which has the responsibility, including jointly with another owner, for decisions concerning the purposes, the methods of

processing personal data and the tools used, including the profile of the safety, in relation to works chin and to the use of this s ito . The Data Controller, unless otherwise specified to, is the licensee of this s ito .

This web site

The hardware or software tool by which the Personal Data of the Users are collected.

Cookie

Small portion of data stored in the User device.

Legal references

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations set forth in Art. 10 of the Directive n. 95/46 / CE, as well as the provisions of Directive 2002/58 / EC, as updated by Directive 2009/136 / EC, regarding Cookies.

This disclosure privacy relates exclusively to this web site .



eatTrace.com is a Dick Trace product that bring food traceability available on your mobile