



INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA Art. 13 GDPR 2016/679

DATA CONTROLLER

The Data Controller is ERIKA GATTA, tax code GTTRKE99D55D612U, email: info@valutup.com.

Data Processed

Personal Data

By visiting this website, personal data relating to identified or identifiable natural persons may be processed.

Browsing Data

During website navigation, certain personal data, such as users' IP addresses, may be collected, as they are necessary for the proper functioning of the site and for security purposes.

Data Provided by the User

Filling out and submitting forms available on the Controller's website entails the acquisition of the sender's contact data (name and surname, startup name, country of origin, email address, purpose of the request, and feedback), which are necessary to reply, as well as any personal data included in the communications. The data provided by the user are required by the Controller to deliver the services offered on the website.

Purpose of Processing

The data are collected from the data subject for the following purposes:

- To fulfill obligations arising from a contract or a pre-contractual relationship;
 - To comply with legal, regulatory, or EU law obligations;
 - To enter data into the website;
 - To enable the use of the company's website functionalities as a result of user access;
 - To communicate data to third parties.
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Legal Basis

The legal basis of the processing is founded on:

- Contractual or pre-contractual necessity;
 - Legal obligation to which the Controller is subject.
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Methods of Processing

The processing of the User's personal data is carried out through the following operations: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure, and destruction of data.



The User's personal data are collected through direct submission to the Controller, by completing forms or templates provided for this purpose, also within contractual documents, or collected during pre-contractual activities.

Data are processed both manually (on paper) and with electronic, IT, or telematic tools. The collected data are recorded and stored by the Controller in digital and paper archives and are safeguarded to minimize the risk of destruction, loss (including accidental), unauthorized access, or unlawful or inappropriate processing.

Data are processed by the Controller's collaborators, duly authorized and instructed.

Nature of Data Provision

Providing personal data for the processing is optional. However, partial or total failure to provide such data may result in the partial or total impossibility of establishing or continuing the relationship with the User, insofar as such data are necessary for its performance.

Recipients or Categories of Recipients of Personal Data

The User's personal data may be processed by:

- Professionals and/or third-party companies engaged to provide services;
- Companies responsible for maintenance/repair of IT and other electronic equipment;
- Third-party software providers, including **Google Analytics**.

User data are not disclosed for purposes unrelated to the Controller's activities.

Data may be shared with collaborators and authorized personnel, as well as entities acting as processors (Article 28 GDPR), carrying out technical or support tasks (e.g., IT maintenance/repair).

Data may be transferred exclusively to a third country or international organization in full compliance with the guarantees set out in Chapter V of the GDPR — either based on an adequacy decision of the European Commission (Article 45 GDPR) or, in its absence, with appropriate safeguards under Article 46 GDPR (e.g., standard contractual clauses).

Data Retention Period

- Clients/potential clients for marketing purposes: 2 years;
 - Clients/suppliers: 10 years after the end of contractual obligations, unless limitation periods are interrupted;
 - Potential clients: 3 years;
 - Browsing data (Google Analytics): anonymized and stored for up to 14 months.
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Data Subjects' Rights

In your capacity as Data Subject, you have the following rights under GDPR:

- **Right of withdrawal** – Article 7 GDPR: You have the right to withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.
- **Right of access** – Article 15 GDPR: You can obtain confirmation as to whether personal data concerning you are being processed and, if so, access such personal data, including a copy.
- **Right to rectification** – Article 16 GDPR: You can obtain, without undue delay, the rectification of inaccurate personal data concerning you or the completion of incomplete personal data.
- **Right to erasure (“right to be forgotten”)** – Article 17 GDPR: You can obtain, without undue delay, the erasure of personal data concerning you.
- **Right to restriction of processing** – Article 18 GDPR: You can request the restriction of processing when:
 - You contest the accuracy of the personal data, for the period necessary for the Controller to verify accuracy;
 - Processing is unlawful and you oppose erasure, requesting restriction instead;
 - Personal data are required by you for legal claims;
 - You have objected under Article 21 GDPR, pending verification of Controller’s legitimate grounds.
- **Right to data portability** – Article 20 GDPR: You can receive your personal data in a structured, commonly used, machine-readable format and transmit them to another Controller where technically feasible.
- **Right to object** – Article 21 GDPR: You can object at any time, on grounds relating to your particular situation, to processing based on legitimate interest or public task, or for direct marketing purposes.
- **Right to lodge a complaint** – Article 77 GDPR: You have the right to lodge a complaint with the Supervisory Authority or bring proceedings before judicial authorities.

Requests to exercise these rights should be submitted to the Data Controller at info@valutup.com.

Google Analytics

This website uses **Google Analytics** to collect anonymous data on website usage. Collected data may include IP addresses (anonymized), pages visited, and session duration. No personal identification is possible.

For more information, see [Google Privacy Policy](#).