



Privacy Policy

1. Foreword on the model of this Privacy Policy

Why do we keep updated our Privacy Policy?

The Organisation respects the GDPR standard by updating the policy and allowing for an easier reading and understanding. The GDPR is a set of regulations with the purpose of reinforcing and unifying the data protection for all the subjects in the European Union. We are implementing it since we think that privacy is very important for all of our clients.

Why do we need your data?

The Organisation uses gathered data to enhance your experience with us and with your consensus give you tailored offers, save your time and make your purchase with ease.

2. Identity and Contacts of the Organisation and the third party vendors

The Organisation Teleradio Diffusione Bassano s.r.l. is located in: Via Melchiorazzo, 7 - 36061 - Bassano del Grappa (Italy), VAT 01711410249, included in the Register of Businesses of Vicenza, entry VI-179922, email amministrazione@medianordest.it, is owner of the handling of personal data of users gathered during the use of the website services, more specifically of its access.

3. Contacts of the Responsible for Protection of Personal Data of the Organisation

Users can contact the responsible for the protection of personal data (also referred as Data Protection Officer or “DPO”) for all the enquiries about the handling of personal data and to the exercise of the rights concerning the rules.

The contact data for the DPO are:

- email: dpo@medianordest.it
- phone: (+39) 0424 504704

4. Handling of data by the Organisation finalised to Profilation and Marketing

With explicit consensus of the user, the Organisation will use personal data in autonomous mode for:

- Analyse and elaborate such data, as well as other information belonging to users (such as gender, ZIP code, birth date, IP Address) to find correlations between the behaviour of users and to add them in different “clusters”, therefore as typologies of clints which may have some characteristics in common. The decision solely based on the automatic handling, including the profilation of users, has legal effects about the interested person (such as his limitation of choice) and it is allowed by the cause of exemption stated in article 22.2.a of GDPR, since it is mandatory



for the execution of the contract between the owner of the data handling and the interested person or who is connected to the contract and to the effectiveness and validity.

The user has anytime the right to:

- Request the intervention of an operator of the Organization
- Express his/her opinion
- Dispute the decision taken by the Organization (e.g.: adding an element in the cluster data)

In order to exercise such right, the user can:

- Contact the organization at the following email: dpo@medianordest.it

The legal base of this treatment is the explicit consensus of the subject. See article 21.1 of the GDPR.

The user can revoke anytime the consensus and, eventually, oppose anytime to the handling of his/her data with a marketing finality by contacting: dpo@medianordest.it

In order to profile users to marketing finality, the Organisation will handle the users' data until the withdrawal of the consensus and/or exercising the right of opposition and, in whichever case, not over 12 months from the data gathering.

Giving data for the profilation and marketing it is not mandatory: there is no legal obligation nor a contract to give such data for the purpose.

5. Right of Opposition

The interested party has the right to oppose in every moment, due to reasons connected to his/her particular situation, to the handling of personal data about him/her and having as legal base the legitimate interest of the owner of the treatment. In the case the data are intended for direct marketing (and as such in the case of treatment for the purposes in which in the "Contacts of the Responsible for Protection of Personal Data of the Organisation" section of this policy) the interested party has the right to oppose in any moment to the treatment of his personal data involving him for such finalities, including the profilation connected to direct marketing. The interested person can exercise his right of opposition against the owner in the following methods:

- In the case where the owner of the treatment is the Organisation, by contacting the Organisation via mail at dpo@medianordest.it

The owner can also oppose to the treatment of his/her data finalised to direct marketing (see the "Contacts of the Responsible for Protection of Personal Data of the Organisation" section of this policy) by using the link which can be found in every promotional communication sent by the organisation or via the "[Privacy Policy]" section.

6. Right of Access

The interested party has the right of getting from the owner of the treatment (i.e.: the company) the confirmation that there is or less a treatment of personal data involving him/her and, in such case, to get access to these personal data and information. The interested person can exercise the right of access:



- In the case where the owner of the treatment is the Organisation, by contacting the Organisation via mail at dpo@medianordest.it

7. Right of Correction

The interested party has the right of requesting from the owner the correction of personal data involving him/her without justified delay. By keeping into account the finalities of the treatment, the interested person has the right of obtaining the correction or/and integration of his/her incomplete personal data, by giving an integrative declaration.

The interested person can exercise his right of correction:

- In the case where the owner of the treatment is the Organisation, by contacting the Organisation via mail at dpo@medianordest.it

8. Right of Removal

The interested party has the right of requesting from the owner the deletion of personal data belonging him/her without unjustified delay.

The interested person can exercise his right of removal:

- In the case where the owner of the treatment is the Organisation, by contacting the Organisation via mail at dpo@medianordest.it

9. Right of Limitation of Treatment

The interested party has the right of requesting from the owner the limitation of the treatment when one of the following conditions is met:

- The interested party disputes the accuracy of personal data for the period of time necessary to the treatment owner to verify the accuracy of such personal data.

- The treatment is illicit and the interested party opposes to the cancellation of personal data and, instead, asks that the use will be limited.

Even if the owner of the treatment will not need personal data, they are mandatory to the interested party for the assessment, the exercise or defense in an act of the judiciary court.

The interested person can exercise the right of Limitation of treatment:

- In the case where the owner of the treatment is the Organisation, by contacting the Organisation via mail at dpo@medianordest.it

10. Right of Portability of Data

The interested party has the right to receive in a structured and organised format, of common use and readable from an automatic device, the personal data about him/her and has the right to transmit these data to another owner of the treatment without limitations from the owner of the treatment whose data were initially given, in the following cases:

- The treatment is based on the consensus of the interested party or a contract
- The treatment is done with automated methods



The interested person can exercise the right to Portability of Data:

- In the case where the owner of the treatment is the Organisation, by contacting the Organisation via mail at dpo@medianordest.it

11. Timing and Modes of reply in case of exercise of the rights

The owner of the treatment gives the interested party information about the actions taken regarding a request of exercising the rights of articles 15 to 22 of the GDPR (i.e.: right of access, right of correction, right of removal, right of limitation of the treatment, right of data portability, right of opposition) and at the sections 6, 7, 8, 9, 10 and 11 of this section ("Rights of the Interested), without unjustified delay and, however, within a month since the enquiry has been received. This term can be extended to two months, if needed, depending by the amount of the complexity and number of requests. The owner of the treatment will inform the interested of this extension and the reasons for the delay within a month from the date since when the enquiry was received. If the interested presents the request via electronic media, the informations will be given in the same way, unless the interested party states otherwise.

12. Right to propose reclaim to a control authority

With exceptions made for any other administrative or jurisdictional enquiry, the interested party who thinks the treatment violates the rules has the right to fill a complaint to a control authority, in the state where he/she lives everyday, works or in the place where the presumed violation has occurred. The control authority whose the complaint has been filled too will inform the sender of the status or outcome of the complaint, including the possibility of a jurisdictional action.