

ONEBIP SERVICE'S PRIVACY POLICY

This Privacy Policy constitutes a notice on personal data processing, provided pursuant to article 13 of Italian legislative decree no. 196/2003 – “Code on the Protection of Personal Data” – (the “Code”), to all visitors which come across the website of Onebip S.R.L., a company with registered offices in Via Gustavo Fara 28 – 20124 Milan (the “Data Controller” or the “Company”).

Let us stress the fact that we are committed to protecting your privacy, keeping the personal data you share with us secure. It is also important for us to clearly explain to you how we collect, use, disclose and otherwise process your personal data. We keep reasonable physical, electronic and procedural security measures to protect your personal data and we have used and will continue to use commercially reasonable efforts to ensure their protection.

1. WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy covers the processing by the Company of personal data collected through the use of the Service, and does not apply to processing of personal data by third parties, including any third party providers of digital content which Users may acquire through the use of the Service or functionalities thereof (hereinafter, the “**Merchants**”).

2. WHAT IS “PERSONAL DATA”?

According to section 4(1)(b) of the Code, the term “personal data” means “*any information relating to natural persons that are or can be identified, even indirectly, by reference to any other information including a personal identification number*”. When you use the Service or functionalities thereof through third-party websites (as described in the Terms of Use), we process personal data of yours such as your mobile phone number, in association with the digital content you acquire. We also process the information you provide us with when you register as a User or Merchant. Moreover, if you are a User, we may also collect and maintain your billing address, Service selections, your wireless or mobile carrier name and account number order number, or any other information required to provide the Services.

3. WHY AND HOW DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data in order to provide you with the Service described in the Terms of Use and/or in the Merchant Agreement, as applicable, and to carry out any and all activities connected with such Service or functionalities thereof (such as, for example, customer care services) through the Onebip website, the Onebip Platform and the Onebip Portal. We may also process your personal data for other purposes expressly set forth by applicable legislation, and to comply with requests we receive from any competent authorities. In particular, we process your personal data in order to:

- Provide you with the Service or functionalities you requested when registering as a user and/or as a Merchant, or when using Onebip through third-party websites;
- Monitor, track and record data regarding all relevant transactions, so as to allow the delivery and billing of the contents;
- Verify the accuracy of your personal data, including the verification of whether you are of the age required for registering to the Service;
- Prevent and identify possible fraudulent behavior;
- Manage administrative and contractual aspects of your relationship with us;
- Provide you with any necessary technical or customer support service;
- Manage any possible complaints or litigation;
- Use personal data in order to make any communications regarding the contractual relationship between you and us.

We process your personal data mostly by electronic means, although it is possible that some of your personal data may be processed in hard copy documents (such as, for example, invoices).

4. DO YOU HAVE TO SUBMIT YOUR PERSONAL DATA TO US? WHAT IF YOU DECIDE NOT TO?

Your submission of personal data for the purposes described in Section 3 above is not mandatory. However, if you do not provide us with the personal data requested, we will not be able to provide you with the Service or any functionality thereof.

5. CAN WE USE YOUR PERSONAL DATA FOR MARKETING PURPOSES?

On the terms of Section 130(4) of the Code, we may use your e-mail address (if you provide it to us), to send you information and marketing material, including newsletters, which regard exclusively services or functionalities which are similar to the Service or functionalities of Service you have used and/or registered to use with Onebip. We will always give you the opportunity to oppose to receive such materials, at any time, and without any costs (“**Opt-Out**”). If you decide to Opt-Out, you will only have to communicate that choice to us, using the contacts provided in Section 10 below. Such choice will have no consequences whatsoever in your use of the Services or any functionality thereof.

We do not serve you with any other marketing or commercial communications which do not regard services or functionalities similar to those you already use, nor do we send you any type of marketing or commercial communication through means other than your e-mail (such as your postal address, fax or phone), without asking for your express consent in advance (“**Opt-in**”). You will of course be entitled to withdraw any such consent at any time and free of charge, using the contacts provided below. Any such withdrawal of consent will have no consequences whatsoever in your use of the Services or any functionality thereof.

Any communications sent to you for marketing purposes shall in all aspects comply with legislative decree no. 70 of 9 April 2003 as amended.

6. TO WHOM CAN WE COMMUNICATE YOUR PERSONAL DATA?

We adopt all necessary measures to ensure that your personal data shall remain safe, private and confidential at all times. We limit access to your personal data by our own employees to individuals who are authorized for the proper processing of such data and any employee found violating our standards of security and confidentiality will be subject to our disciplinary processes.

Your personal data may be communicated to third parties – also outside the European Union – who carry out activities which are ancillary and instrumental to those of ONEBIP. In particular, and exclusively for the purposes described above, your personal data may be communicated to:

- Companies which render services of customer support on our behalf;
- The Merchants, for delivery, invoicing and customer support purposes;
- Your mobile phone operator and/or internet access provider, for invoicing and customer support purposes;
- Companies which provide us with services regarding the Onebip platform or any functionalities of the Service, in order to allow it to run smoothly, and allow us to efficiently provide you with the Service or functionalities thereof that you require from us.

Furthermore, we may make your personal data available to other third parties in the following limited circumstances:

- When we are compelled to do so by a governmental agency, court or other entity (e.g., to respond to subpoenas, court orders or legal process);
- In legal proceedings, if we believe your actions violate any law, regulation, any term or condition of the Terms of Use, including, without limitation, this Privacy Policy, or any of Additional Terms or if you threaten the rights, property or safety of us, our parent, subsidiaries or affiliated companies, our Service, any of our operational service providers, suppliers, advertisers, customers, Users or Merchants; or
- In the event of a bankruptcy, merger, acquisition, transfer of control, joint venture or other business combination involving us.

7. WHAT ARE YOUR RIGHTS REGARDING OUR PROCESSING OF YOUR PERSONAL DATA?

According to Section 7 of the Code, you are entitled to obtain confirmation of whether we have collected any of your personal data, even if we have not yet registered any personal data. Moreover, in accordance with the same Section, it is your right to obtain:

- Updating, rectification or, where interested therein, integration of your Personal Data;
- Erasure, anonymization or blocking of personal data that have been processed unlawfully, including personal data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
- Certification to the effect that the operations set out in the previous points have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

You have also the right to object, in whole or in part, to the processing of your personal data, for legitimate reasons; however, you may oppose to the processing of your Personal Information for marketing purposes, freely, in accordance with Section 6 above.

You may exercise any of these rights by contacting us using the contact details provided below.

8. USE OF “COOKIES”

Please refer to our cookies policy, available [HERE](#)

9. HOW CAN YOU CONTACT US?

You may contact us in order to exercise any of the rights described in above, to obtain further information on how we obtained your personal data, how and why we process it and who we communicate your personal data to, to obtain more information regarding us, to opt-out or to opt-in from receiving marketing communications from us as described above or, more generally, for any questions, concerns or feedback you have regarding our processing of your personal data, using the following contact information:

Onebip S.R.L.

Via Gustavo Fara 28, 20124 Milan

e-mail: support@onebip.com

10. HOW DO WE UPDATE OUR PRIVACY POLICIES AND THIS PRIVACY NOTICE?

We verify the accuracy and sufficiency of our policies with regard to privacy and safety on a regular basis and, if applicable, we may amend such policies and the present Privacy Policy at our sole discretion due to changes in the applicable legislation or in our own organization and internal policies or due to technology evolution. Please revisit this page to stay aware of any changes. We shall publish any such new versions of this Privacy Policy on the Website immediately as they become effective.