

PRIVACY POLICY

1. INTRODUCTION

If you have just a few minutes, we will explain in a simple way what we do with your personal data that we collect when you access and use our services on www.glickon.ai ('**Flow**' or the '**Service**').

The applicable legislation, mainly consisting in the Regulation (EU) 2016/679 (*General Data Protection Regulation*, '**GDPR**') and relevant member States' implementation laws, together with the European Data Protection Board's and national Supervisory Authorities' decisions and provisions (all together, the '**Privacy Law**'), identifies a number of actors which must – or simply may – go on the stage, taking part in the personal data processing operations. Their roles and responsibilities vary based on their decision-making power and degree of involvement as to how and why the data will be processed.

DATA CONTROLLER

The main actor, named 'data controller', freely determines the purposes, methods and tools of the processing, being therefore required to guarantee the security of your personal data and to protect all of your rights under the Privacy Law.

In its quality as developer and owner of the Service, the data controller of the processing operations carried out through Flow is **Glickon S.p.A.**, a company duly incorporated under the laws of Italy, with registered office in Milan, via Nino Bixio 7, VAT/registration number 08573820969 ('**Glickon**', '**Controller**' or '**we/us**').

There may be other players on the scene who play a supporting role in favour of the data controller, rather than a leading function. More in detail, the Privacy Law establishes that one or more specific data processing activities can be entrusted by the controller to reliable external providers, named '**data processors**', who are only allowed to act on behalf and upon written instructions – and so as an 'operating arm' – of the controller.

Keep in mind that whenever in this policy we refer to a '**processing**' of data, it will be an operation carried out, whether or not by automated means, with or through personal data, such as by way of example collection, recording, organization, storage, extraction, modification, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison and deletion of data.

That being said, it must be specified that '**personal data**' are not only those immediately referable to you (e.g. name and surname), but also those which, in combination with other information available to us or to any third party, would still allow your identification (e.g. an employee ID number assigned by your Company, or the IP address of the device by which you access the Service).

2. THE SERVICE SETTINGS TO PROTECT YOUR PRIVACY

The Service has been designed and set up in such a way as to reduce as much as possible the collection and use of your personal data, excluding the processing in all cases when it is possible to rely on less privacy-intrusive methods.

This Privacy Policy governs exclusively the data processing operations carried out through the Service and must never apply to third parties' (i) websites, applications and web platforms accessible in any manner from or via Flow, including in any Texts (as defined in the applicable [Terms & Conditions](#)) you may generate through the Service, or (ii) tools and software embedded in the Service.

We therefore invite you to carefully read any third party's privacy policy before accessing its websites, platforms or applications, or using its services, in order to better understand how your personal data will be processed.

3. TYPES OF DATA COLLECTED AND PROCESSED

The data that we will collect and process for the purposes described in Par. 4 are the following:

A. Web browsing necessary data

The computer systems used to ensure the proper functioning of the Service gather, during their normal operation, some data which are necessary for the use of Internet network protocols (e.g. the IP address of the device you use to access and browse the Service). In the absence of additional information, this type of data does allow us solely to enable your access and navigation and proper use of the Services, without identifying you.

B. Data collected by means of cookies

We use technical and functional cookies – namely web tracking tools – to make your browsing on the Service easier and smoother. For more detailed information regarding the processing of your data deriving from the cookies that may be installed on Flow, please read the applicable [Cookie Policy](#).

C. Contact details

We will collect the data you will provide to us in connection with and in the context of any request you may make related to the Service.

Should you write to Glickon for any kind of information, support or technical assistance, using the contacts and the forms we made available within the Service, we will receive your e-mail address, as well as any other information and personal data you will decide to share with us in the subject, content and any attachment of your communication.

Please do not share any personal data which is not necessary solely to allow us to reply and give effect to the specific requests you make from time to time. In most cases, we will delete any unneeded data, except when Glickon is explicitly permitted to process them under the applicable Privacy Law.

D. Registration and account data

You will be required to register, or log-in (if you are already registered), in order to access and use the Service.

To this purpose, we will ask your name and surname, the name of the company you work for and your corporate e-mail address, as well as to choose a suitable personal password, to be then kept secure and confidential under your sole responsibility.

Once your registration is finalized, you may freely decide whether to enrich or not your personal profile with more detailed information (e.g. your image, your corporate role). If you decide to do so, we will collect and process also such additional personal data provided to us on a voluntary basis.

E. Payment details

When and to the extent you decide to purchase Flow Credits ([as defined in our Terms & Conditions](#)), you will be required to provide certain payment information, including credit card or other payment methods details, as well as VAT number and billing address, needed to enable us to charge and invoice the applicable fees.

4. PURPOSE AND LEGAL BASIS OF THE PROCESSING

Control over what is done with your personal data is and must remain solely in your hands.

For this reason, it is our duty to provide you with any necessary details about all the processing operations we can carry out through the Service and, for each of them, indicate the legal basis that permits us – or would permit us, if the processing relies on your consent – to perform such activities.

✓ *Browsing the Service*

We will collect and process only few technical data which are needed to enable you to easily access and smoothly navigate on Flow, using the Service without slowdowns or hindrances deriving from the functioning of Internet protocols (Art. 6.1, b), of the GDPR). Note that this information does not allow us to single-out any specific person without matching it with separate additional personal data.

✓ *Managing cookies*

For in-depth information regarding our use of cookies installed on Flow, please read our [Cookie Policy](#).

✓ *Responding to your contact and support requests*

If you decide to contact us for any reason, such as requesting information or assistance regarding the Service, we will process your personal data for the exclusive purpose to reply and follow-up on your request (Art. 6.1, b) of the GDPR). In absence of your data, we will not be able to process and respond to your request.

✓ *Managing your registration to the Service and your Flow account*

In order to allow you to access and use the Service (Art. 6.1, b) of the GDPR), you will be required to finalize your registration, providing us with those data which are necessary for the creation of your Flow account (Art. 6.1, b) of the GDPR). The same legal ground applies should you freely decide to share additional personal data with us to enhance your personal account. If you prefer not to sign in, you will not be able to access the Service.

We will use your registration and account data, including your e-mail address, also to send you communications related to the Service, with no commercial nature or purpose, solely in connection with the management of your Flow account and the functioning of the Service.

✓ *Processing payments*

The payment needed to purchase Flow ‘Credits’ cannot be processed and the relevant fees cannot be invoiced if you do not provide us with all necessary payment and billing details. Such information will be used by us for the exclusive purpose of enabling the payments and charging the applicable fees (Article 6.1, b) of the GDPR).

✓ ***Soft-spam and other marketing channels***

Unless you object to this processing at any moment, we will use solely the email address provided during your registration to Flow, to pursue our legitimate interest (Art. 6.1, f), of the GDPR) to inform you regarding other technological products and services offered by Glickon.

Without any prejudice to soft spam marketing described above (only via e-mail), in case you provide us with your free and specific consent, we will carry out commercial communications also by means of other automated (e.g. SMS, in-service notifications, preregistered telephone calls) and non-automated (e.g. live telephone calls) channels.

✓ ***Other purposes***

In addition to the above, we can process your data described in Para. 3:

- based on our legitimate interest to prevent and fight crimes and frauds committed on or through the Service, as well as to establish or exercise legal claims or defend our rights before competent Courts (Art. 6.1, f), of the GDPR);
- based on our legitimate interest to elaborate and generate aggregate statistics that no longer allow your single-out (Art. 6.1, f), of the GDPR);
- in order to comply with a legal obligation to which we are subject or to fulfill an order or a decision by public competent Authorities (Art. 6.1, c), of the GDPR).

5. WHO CAN ACCESS AND PROCESS YOUR PERSONAL DATA

The access to your data will be allowed exclusively to Glickon's personnel, duly trained on the applicable privacy and security safeguards and authorized in writing to process only those data which are necessary to carry out their specific and respective tasks.

Should we outsource any data processing activity relating to the functioning of the Service, each vendor engaged will be bound to guarantee at least the same levels of protection of your data offered by us, by signing a specific agreement with Glickon under Art. 28.3 of the GDPR, in quality as our data processor.

Your data will not be disclosed in any way, nor communicated to third parties, except to comply with orders or provisions issued by competent authorities.

In any case, we have adopted a series of technical and organizational measures to ensure appropriate levels of security, so to prevent all reasonably foreseeable risks that may jeopardize your personal data, with particular but not limited reference to accidental or unlawful destruction, loss, alteration, or unauthorized disclosure or access to such data.

Under no circumstances your personal data may undergo automated decision-making processes, including profiling.

6. TRANSFER OF DATA TO THIRD COUNTRIES

Your personal data may be transferred outside the European Economic Area ('EEA'), to the extent this is necessary for the purposes mentioned in Par. 4.

In this case, the data importers – either when acting as data controllers or processors – will be bound to comply at least with the same data protection and security obligations Glickon is subject to under

the applicable Privacy Law (e.g. by signing Standard Contractual Clauses set out by the Commission Implementing Decision (EU) 2021/914 of 4 June 2021 and, where needed, carrying out a ‘Transfer impact assessment’) especially in view of ensuring that you are allowed without any limitation to enforce all of your rights and legal remedies, as established in the GDPR.

7. FOR HOW LONG WE WILL PROCESS YOUR DATA

We will retain your personal data only for the time necessary to achieve the purposes described above. This means that the data collected:

- ✓ to allow your access and use of the Service will be processed for the sole time of your navigation on Flow, or until you decide to delete them (by eliminating technical and functional cookies – see here below);
- ✓ by means of the cookies installed on Flow will be processed only for the duration – *i.e.* until the expiry date – of each specific cookie to which they are associated, as specified in the applicable [Cookie Policy](#);
- ✓ in relation to your contact or support requests will be processed only for the time necessary to provide you with the needed information and/or assistance, so as to properly handle and follow-up your request. At the latest 1 (one) year after the last response sent by us to you, the data will be deleted;
- ✓ to allow and manage your registration to the Service will be processed until you decide to delete your personal account on Flow, or in any case of termination of the agreement with Glickon under the applicable [Terms & Conditions](#);
- ✓ with specific reference to soft-spam, the e-mail associated with your Flow account will be used to send you communications regarding other tech services and products offered by Glickon until you object, at any moment, to this processing;
- ✓ to carry out or send you marketing communications by automated and non-automated means other than your e-mail until you withdraw, at any moment, your specific consent for this purpose;
- ✓ to process the payments and charge and invoice the applicable fees will be processed for 10 (ten) years from the moment that each payment is finalized.

Following the expiry of the terms set out above, we will be entitled to keep processing your data for those purposes which are permitted, or even mandatory, under the laws in force from time to time (e.g. to establish and/or exercise legal claims and/or defend our rights before competent Courts).

As soon as no longer necessary in accordance with the above, your data will be cancelled.

8. YOUR RIGHTS

You can exercise your rights at any time according to the applicable Privacy Law, including:

- a. **Access:** accessing your personal data, obtaining evidence – among others – of the purposes of the processing by Glickon, the categories of data involved, the recipients to whom the data may be disclosed, the applicable storage period, the existence of any automated decision-making process;
- b. **Rectification:** having incorrect personal data referred to you rectified without any undue delay;

- c. **Erasure:** having your data erased, unless a specific exemption applies, when such data (i) are no longer necessary in relation to the purposes for which they were collected or otherwise processed; or (ii) have been unlawfully processed; or (iii) are subject to a processing that you have objected to on the basis of your particular situation, as set out in point f. below, and there are no overriding legitimate grounds which allow us to keep processing the data; or (iv) are undergoing a processing for direct marketing purposes; or (v) have to be erased for compliance with a legal obligation applicable to Glickon;
- d. **Restriction of processing:** obtaining restrictions to the processing operations concerning your data, when (a) you contest the accuracy of your personal data (solely for the period enabling us to verify their accuracy); (b) the processing is unlawful and you oppose the erasure of your data and request the restriction of their use; (c) we do no longer need your personal data for the purposes identified above, but you require them for the establishment, exercise or defense of legal claims; (d) you have objected to the processing of your data, pending our verification as to whether overriding legitimate grounds exist which allow us to keep processing your data;
- e. **Portability:** requesting to receive in a structured, commonly used and machine-readable format the data you have provided to us or, where technically feasible, having them transmitted directly to another controller;
- f. **Objection:** impeding at any time the processing of your data for direct marketing purposes (soft spam) and, on grounds relating to your particular situation, any processing activity based on our legitimate interest (Art. 6.1, f), of the GDPR), as described in Par. 4 above;
- g. **Enforce your rights:** lodging a complaint to the competent Supervisory Authorities ([link](#)).

To exercise your rights and to request any kind of information or clarifications regarding the data processing operations described in this Privacy policy, please just send us a written request at any time, by paper mail, to Glikon S.p.A., Via Nino Bixio 7, Milan (20129), or via e-mail to privacy@glickon.com.

Last update, July 2022