



PRIVACY POLICY

Updated on 25.05.2018

Aura srl, owner of the registered trademark Sevens Skincare, with registered office in Via San Carlo 7 / a, 20030 Senago (MI) Italy and operational headquarters in Via P. Mascagni 42, 20030 Senago (MI) Italy, ("Company" or " us "), as the data controller intends to inform you about the methods and purposes through which it collects, processes and communicates your personal data through the website www.sevensskincare.it (" Site ") and the services connected to it ("Services"), in compliance with all applicable laws and regulations regarding the protection of personal data and with particular reference to: (i) Regulation (EU) no. 679 of 27 April 2016 (so-called General Data Protection Regulation or "RGPD"), applicable from 25 May 2018; is (ii) any further law, regulation or provision of the competent national and European authorities regarding the protection of personal data - hereinafter, jointly, the "Applicable Privacy Law".

Please note that the Services include the ability to purchase Company products and to participate in sweepstakes, sweepstakes, contests and / or other initiatives organized by us.

1. WHO IS THIS POLICY ABOUT?

The Company is the owner of the processing of personal data (ie, information concerning an identified or identifiable natural person - as an interested party) collected directly by you through the Site and the Services. These data are processed in accordance with this Notice and the Applicable Privacy Law.

This Policy and our Cookie Policy refer to all users, including those who use the Site and the Services without having registered, subscribed or used any specific service.

2. WHAT CATEGORIES OF PERSONAL DATA DO WE COLLECT?

The Company collects (1) data that you have voluntarily shared with us and (2) data relating to your activity on the Site or your interactions with the Services. In particular, the Company collects the following types of data:

- Registration data: collected through the registration form.
- Activity data: while accessing or interacting with the Site and the services, we can collect some information on such visits. For example, to allow the connection to the Site or the Services, our servers receive and record information on the visitor's computer, device and browser including the IP address, browser type and, potentially, other

information on the software and hardware used. If accessed from a mobile or other device, the unique identifier assigned to it can be detected. Cookies and other first or third party tracking technologies may also be used, which may also be used to collect and store information on the use of the Site or services - such as pages visited, content viewed, searches made and advertisements liked. Further information is contained in our Cookie Policy.

If the information collected from and about the user does not identify him as a specific person (such as raw data, in aggregate or anonymous form), directly or indirectly, they can be used for any purpose or shared with third parties, to the extent permitted by applicable data protection legislation.

We do not collect particular categories of personal data: we expressly ask you not to send us and not to disclose on or through the Site, the Services or in any other way information included in particular categories of personal data (such as social security numbers, information regarding the origin racial or ethnic, political opinions, religious or other beliefs, health, criminal record or trade union membership).

3. PURPOSE OF THE PROCESSING OF PERSONAL DATA

We process the personal data collected from you and about you for:

- A. allow you to register on the Site, use the Site and our Services;
- B. evaluate and improve the use of our Services and the user experience during the browsing the Site;
- C. provide you with assistance and manage correspondence and service communications with She;
- D. follow up on your purchase request, with reference to the processing of the request and the related legal, administrative, accounting and tax obligations to purchase;
- E. fulfill legal obligations and respond to requests from public authorities estate;
- F. verify the completeness, validity and correctness of the data provided, also for the purpose of protect the rights of the Company and others: more specifically, (ii) to protect the security and privacy of users of the Site or Services; is (iii) to protect against computer fraud;
- G. with your optional consent, to send you commercial communications and announcements on Sevens Skincare products and events by automated (sms, mms, e-mail, telephone calls without operator, etc.) and non-automated (telephone calls with operator or paper correspondence).

Where the data collected from you or about you does not identify you personally, we may use that information for additional purposes or share it with third parties.

4. ON WHICH LEGAL CONDITIONS IS THE PROCESSING OF PERSONAL DATA BASED?

The processing of personal data for the purposes of:

- a) paragraph 3, letters to), b), there is d) of this Privacy Policy is necessary for the management of the website and the provision of the Services;
- b) paragraph 3, letter e) of this Privacy Policy is mandatory as required by applicable legislation;

- c) paragraph 3, letter f) of this Privacy Policy is based on the legitimate interest of the Company, if any;
- d) paragraph 3, letter g) of this Privacy Policy is made on the basis of the user's optional consent.

These data processing activities are not mandatory and the user can oppose them or withdraw the consent (if required) at any time using the methods described in paragraph 10 of this Policy. It is not mandatory to provide the requested data but failure to provide them makes it impossible to register on the site, to manage your request or to start and continue the purchases you intend to make.

HOW LONG DO WE KEEP PERSONAL DATA?

The Company processes personal data for a period of time not exceeding the achievement of the purposes envisaged in accordance with paragraph 3 above. In any case, the following retention periods apply:

1. a) the data collected for the purposes referred to in paragraph 3, lett. from to), b), there is d) are kept for the period strictly necessary to allow the user to use the website or the Services;
2. b) the data collected for the purposes referred to in paragraph 3, lett. e) are kept for ten (10) years in order to comply with applicable laws and regulations;
3. c) the data collected for the purposes referred to in paragraph 3, lett. f) are kept for the period strictly necessary to pursue the legitimate interests of the Company;
4. d) the data collected for the purposes referred to in paragraph 3, lett. g) are kept for the period strictly necessary to fulfill the purposes for which they were originally collected and, in any case, they are deleted once the user no longer interacts with our Site or revokes consent.

HOW ARE PERSONAL DATA PROCESSED?

For the purposes indicated above, the data are processed electronically and manually, and are protected by adequate security measures. In this regard, although the Company applies adequate administrative, technical and physical measures to safeguard the data in its possession from loss, theft, unauthorized use, dissemination and modification, it cannot guarantee the exclusion of all possible IT risks.

6. WHO HAS ACCESS TO PERSONAL DATA?

For purposes consistent with those indicated in paragraph 3 of this Privacy Policy, the Company may share personal data with the following categories of recipients based within the European Union, in compliance and within the limits of the provisions of the following paragraph 7 :

- a) Third party service providers to whom processing activities are entrusted and duly appointed data processors or sub-processors if required by applicable legislation (e.g. cloud service providers, providers of services instrumental to or supporting the Services - and therefore, to by way of example and without limitation, banking institutions for the management of payments and receipts relating to purchases, companies that provide IT services, direct-marketing service providers, experts, consultants and lawyers, companies deriving from any mergers, divisions or other transformation); and
- b) National competent authorities in compliance with applicable legislation;

7. ARE PERSONAL DATA TRANSFERRED ABROAD?

We do not transfer personal data to countries located outside the European Economic Area (EEA).

8. MINORS UNDER THE AGE OF 18 YEARS

The Site is not aimed at persons under the age of 18 and the Company does not collect knowingly personal data from minors.

9. WHAT RIGHTS CAN BE EXERCISED IN RELATION TO PERSONAL DATA?

The User has and / or can exercise the following rights at any time, free of charge:

1. a) the right to be informed about the purposes and methods of the processing;
2. b) right of access;
3. c) the right to obtain a copy of the data held abroad and information on the place in which they are stored;
4. d) the right to request the updating, correction or integration of data;
5. e) the right to request the cancellation, anonymization or freezing of data;
6. f) the right to object to the processing, in whole or in part, even where it is carried out through automated decision-making, including profiling;
7. g) right to withdraw consent to the processing of data freely and in any moment;
8. h) right to contact the data protection officer, if applicable;
9. i) right to lodge a complaint with the competent national authority in the matter of data protection or judicial authorities;
10. j) right to data portability (i.e. to receive an electronic copy of data personal data concerning him, for any transfer to the User or to another holder);
11. k) right to limit the processing

12. HOLDER RESPONSIBLE FOR THE PROTECTION OF PERSONAL DATA

The data controller is Aura srl, with registered office in Via S. Carlo 7 / A 20030 Senago (MI), Italy and operational headquarters in Via P. Mascagni 42, 20030 Senago (MI), Italy. Please send any communications relating to this Notice to the headquarters operational of the Data Controller, located in Via P. Mascagni 42, 20030 Senago (MI), Italy, email iinfo@auramilano.it.

The Data Protection Officer pursuant to Article 37 of the Privacy Regulation can be contacted at the email address info@auramilano.it, or at the address Aura srl Via P. Mascagni 42, 20030 Senago (MI), Italy.

11. CHANGES AND UPDATES

This Privacy Policy enters into force on 25 May 2018. The Company may modify and / or supplement this Privacy Policy also following the modification and / or integration of the applicable legislation on data protection. These changes will be periodically communicated in advance by the Company and it will always be possible to consult the updated version on this page.