



## Privacy policy

This privacy policy describes the processing of personal data carried out in the context of the services provided by Casavo and, specifically, through the website <https://www.casavo.com/it/> ("Website") and the appointments management app ("App"). In accordance with EU Regulation 2016/679 ("GDPR") and the applicable national legislation on the protection of personal data, Casavo Management S.p.A., with registered office in Milan, via Elia Lombardini n. 10, registered with the Register of Companies of Milan, registration number and tax code 10053290960, VAT code 10540340964, in its capacity as data controller (hereinafter "Data Controller" or "Casavo"), hereby informs you that your personal data will be processed for the following purposes. Unless otherwise indicated, the information included in this privacy policy shall be considered applicable to the personal data processed in the context of both the Website and the App. It is understood that for the processing of personal data carried out for purposes other than those indicated below, the processing information relating to the services considered from time to time will apply.

If you have any questions regarding this Privacy Policy or our use of your personal data, cookies and other similar technologies, you can contact our Data Protection Officer by email at [dpo@casavo.com](mailto:dpo@casavo.com)

### **1. CATEGORIES OF PERSONAL DATA PROCESSED**

The Data Controller processes personal identification data and other personal data (not belonging to special categories) which are communicated by users when requesting services from the Data Controller through the Website and/or the App, or when otherwise using the Website and/or the App. Most notably, the personal data include, but are not limited to:

- in the context of the use of the Website: first name, last name, telephone number, e-mail address, postal address, IP address and session ID;
- in the context of the use of the App: in addition to the above categories of personal data, the videos and images of the video calls provided by the user during authentication to the App and during its use.

The Data Controller also processes, exclusively in anonymous form, data relating to the use of the App and the Website (including the overall number of downloads and the most frequently viewed screens).

### **2. PURPOSES OF THE PROCESSING AND LEGAL BASIS**

Personal data may be processed for the following purposes and legal basis:

A. "Service Purposes" such as:

- to process and accommodate the user's requests (for example, for the management of contact requests, to enable users to forward requests for information to third-party advertisers whose real estate advertisements are published on the Website, as well as to enable users acting on behalf of third-party real estate agencies – upon prior registration in the reserved area of the Website – to publish real estate advertisements on the Website);
- to enable the user to access and use our real estate purchase and sale services, as well as to enable the fulfilment of activities ancillary or complementary to such services (for example, to organize inspections at the properties with Casavo's staff and/or consultants – including virtual inspections via video calls – to carry out appraisals or estimates on the properties, to collect and transmit the documentation relating to the sale or purchase of such properties);

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- to register for Casavo's personal area, whereby the user can create a personal account from the registration page provided. In fact, it is possible to register via Gmail ID (e-mail) and a password. As part of this processing, the user is responsible for the correctness and truthfulness, as well as the safekeeping of login credentials and web activities traceable to his or her identity. To delete the profile, the user can access the restricted area and from the specific section he/she can click on the "Request cancellation of profile and personal data" button;
  - to provide specific services including saving listings, searches, and search criteria, against the user's request (click on the "save search" button). Also in order to provide content similar to the user's searches, requests and interests, via email, or other computer or telematic mode.
  - to enable the use of the Website and its operational functions, including the resolution of technical problems (also using the chat box displayed on the Website).
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- provide certain services including the saving of advertisements, searches and search criteria, in response to the user's request (click on the 'save search' button). Also in order to provide content similar to the user's searches, requests and interests, via e-mail, or other computer or telematic means.
  - promote functional activities to match demand and supply of real estate, also identified through the processing (without profiling or automated processing pursuant to privacy regulations) of information and personal data of users enabling analysis. In order to do so, it is necessary to use the information acquired from the data subject (so-called database enrichment): the processing of the set of information thus makes it possible to subdivide/segregate users according to common/similar parameters, and to offer the display of ads in an aggregate and anonymous manner, consistent with the characteristics of the properties for sale. The type of processing can be traced back to point 5 of the "Terms and Conditions" which refers to the methods for providing the service on the "Ads Platform".

For the "Service Purposes" referred to in this letter A, personal data will be processed without the need to collect the user's prior consent.

## B. Purpose of fulfilment of the Data Controller's legal obligations

Personal data will be processed in order to ensure the compliance of the Data Controller with the obligations provided for by applicable laws, regulations or national and EU legislation or imposed by the competent authorities, without the need to collect the user's prior consent.

## C. Purposes related to the pursuit of a legitimate interest of the Data Controller,

In particular, the Data Controller will process persona data:

- allow the user to take advantage of Co-Agency services, i.e. the taking over, on the Casavo classifieds platform, of the sale of real estate through an agency - and therefore without such real estate being purchased by Casavo itself (by way of example, for the management of requests to buy and sell real estate outside the geographical areas or property purchase criteria provided by the Casavo Management service, or in the event that the user wishes to sell his or her property with Casavo, preferring market prices);
- to prevent and repress unlawful acts, as well as to exercise the Data Controllers' rights in court and manage claims: the Data Controller's interest lies in the constitutional right to take judicial action (art. 24 of Italian Constitution) and, as such, is socially recognized as prevailing over the interests of the individual data subject concerned;
- to manage and maintain the Website and/or the App: the Data Controller's interest lies in the general interest of a company to ensure its business operations, also through the operation of the Website and/or the App, as well as in the implementation of possible improvements of the service offered;

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- to prevent or uncover fraudulent activities or abuse harmful to the Website (including to verify the entitlement of users acting on behalf of third-party real estate agencies to publish real estate ads on the Website on their behalf) and/or the App: the interest of the Data Controller lies in the legitimate, actual and current interest not to suffer damages as a result of the unlawful conduct of third-parties;
- to transmit personal data to other companies controlled by the Data Controller located within the European Union (“Casavo Group Companies”) for internal administrative purposes, in accordance with the provisions of Recital 48 of GDPR, and to enable Casavo to provide its services;
- to send commercial communications by e-mail (“soft spam”) relating to services and products of the Data Controller which are similar to those that the user has already used, if the user is already a customer of Casavo: the interest of the Data Controller lies in the general interest of a company to promote its services and is considered legitimate because in line with the reasonable expectations of the data subjects, in light of the relationship between them and the Data Controller. Each e-mail will allow the user, by clicking on the specific link provided therein, to refuse further mailings.

For the purposes referred to in this letter D, personal data will be processed to pursue a legitimate interest of the Data Controller, without the need to collect the user’s prior consent.

#### D. “Marketing purposes”:

- to contact the user with communications and/or newsletters about the activities, initiatives and commercial offers of the Data Controller, as well as to conduct market researches and surveys or other activities aimed at measuring the quality of the services offered (including by mail, telephone, e-mail or SMS notifications).

For the marketing purposes referred to in this letter D., personal data will be processed only with the prior express consent of the user.

#### E. “Marketing purposes of third parties”

In particular, the Data Controller will process personal data:

- to communicate personal data to the Casavo Group Companies, as well as to the Data Controller’s partners such as real estate agency networks, search engines and/or companies operating in business sectors similar and/or complementary to real estate (e.g. furnishings, financial sector, mortgages, removals, etc.), which will process the personal data for their own marketing purposes, including by mail, telephone, e-mails or SMS notifications.

For the marketing purposes of third parties referred to in this letter E., personal data will be processed only with the prior express consent of the user.

### **3. PROCESSING METHODS**

The processing of personal data is carried out, electronically and on paper, by means of the collection, recording, updating, organization, storage, consultation, elaboration, modification, selection, extraction, comparison, use, interconnection, restriction, erasure and destruction of personal data. Personal data are protected so as to minimize the risk of destruction, loss (including accidental loss), unauthorized access/use or use incompatible with the initial purpose for which the personal data have been collected. This is achieved through the technical and organizational security measures implemented by the Data Controller.

### **4. RETENTION OF PERSONAL DATA**

The Data Controller processes the personal data for the time necessary to fulfil the purposes for which they have been collected, and in any case for no later than the periods detailed below. It being understood that, at the end of the periods indicated below, the Data

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Controller will nevertheless be entitled to further retain the personal data, in whole or in part, for certain purposes, as expressly required by specific legal provisions or to exercise or defend a right within the ten-year limitation period provided for in Article 2946 of the Italian Civil Code (for example, in the event of a legal proceeding against the user).

## 4.1 Retention of personal data in the context of the use of the Site

In the context of the use of the Website, the Data Controller processes personal data for the time necessary to fulfill the purposes set out in Section 2 above (Purposes and legal basis of the processing) and in any case:

- 10 years after collection for the "Purposes of Service";
- in relation to the "Purposes of fulfilling Data Controller's legal obligations" for the time required by the applicable regulatory provisions;
- no longer than 2 years after collection for "Purposes related to the pursuit of a legitimate interest of the Data controller";
- no later than 2 years from the collection thereof, for the Marketing Purposes and the Marketing Purposes of third parties

## 4.2 Retention of personal data in the context of the use of the App

In the context of the use of the App, the Owner processes personal data for the time necessary to fulfil the purposes set out in Section 2 above (Purposes and legal basis of the processing) and in any case:

- no later than 4 months from the collection thereof, with regard to the videos recorded during the video calls;
- no later than 18 months from the collection thereof, with regard to the images recorded during the video calls.

## **5. PROVISION OF PERSONAL DATA**

In the context of the use of the Website and/or the App, the provision of personal data:

- for the "Service Purposes" of the Website and/or the App is necessary. These personal data are necessary for the relationship with the Data Controller and the use of the services. The user may, however, decide not to provide personal data, but in such case he/she will not be able to use the services of the Data Controller;
- for the "Marketing purposes" in the context of the use of the Website and/or the App is optional. Failure to provide personal data does not prevent the user from using the services of the Data Controller, but the user will not receive the information and offers of the Data Controller's and will not be contacted to participate in market researches, surveys or activities aimed at measuring the quality of the services offered;
- to communicate your personal data to the Casavo Group Companies, the Data Controller's partners and to sector search engines for the "Marketing purposes of third parties" in the context of using the Site and/or the App is optional. Failure to provide personal data does not prevent the use of the Data Controller's services, but the user's personal data cannot be communicated to the Casavo Group Companies and the Data Controller's partners (such as real estate agencies and/or search engines and/or companies operating in sectors similar and/or complementary to real estate (for example, furnishings, financial sector, mortgage, removals)) for the "Marketing purposes of third parties".

## **6. ACCESS TO PERSONAL DATA**

Personal data will be processed by our staff in charge for the processing of personal data and by the following categories of subjects (including, but not limited to):

- employees and/or collaborators of the Data Controller in their capacity as data processors and/or persons authorized to process personal data and/or system administrators (by way

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of example, consultants authorized to manage the Website and to provide the relevant services in the context of the use of the Website; real estate analysts in the context of the use of the App);

- employees and consultants of the legal, marketing (in case you consented to the Marketing Purposes), finance, administration and accounting departments and our other departments, in their capacity as data processors and/or persons authorized to process personal data;
- Casavo Group Companies and third parties to whom the Data Controller outsources certain services, including processing operations, as external data processors (e. IT service providers, hosting providers, etc., as well as, in the context of the use of the App, real estate agencies that use the App to organize and manage the virtual appointments on behalf of the Data Controller).

## **7. COMMUNICATION OF PERSONAL DATA**

In the context of the use of the Website and/or the App, the Data Controller may communicate the personal data of the users:

7.1 without the user's consent:

- to third parties in their capacity as independent data controllers for the performance of the "Purposes of Service" (for example to allow the user to forward requests for information to advertisers whose real estate advertisements are published on the Site), as well as to allow Casavo Group Companies to provide their respective services, also based on the location of the user's property or whose purchase the user intends to evaluate (by way of example, if the property is located in Germany, personal information, if necessary, will be forwarded to our German group leader who will process the user's request and, if applicable, prepare all the necessary steps for the sale of the property). The sales process and its preparation are described in more detail in our Terms and Conditions. The user may at any time request the Data Controller, by writing to the address indicated in Section 10 (How to exercise rights) below, further information on the subjects to whom his personal data may be communicated;
- with the exception of videos and images, to third parties (for example, Casavo Group Companies, partners, freelancers, etc.), as independent data controllers, for the fulfilment of activities ancillary or complementary to the Service Purposes in the context of the use of the App;
- to control bodies, law enforcement agencies or the judiciary, financial and tax administrations, ministerial bodies and competent authorities, local authorities (regions, provinces, municipalities), upon their express request, which will process the personal data as autonomous data controllers for institutional purposes and/or in accordance with the law in the context of investigations and controls.

7.2 only with the user's prior consent, exclusively in the context of the use of the Website:

- to the Data Controller's partners such as real estate agency networks, search engines and/or companies operating in business sectors similar and/or complementary to real estate (e.g. furnishings, financial sector, mortgages, removals, etc.), as well as to Casavo Group Companies, for the Marketing Purposes of third parties. The updated list of the third-party autonomous data controllers to which users' personal data may be

communicated is kept at the offices of the Data Controller and may be requested by contacting the address indicated in the below Section 10 (Exercise of data subjects' rights).

## **8. TRANSFER OF PERSONAL DATA**

In the context of the use of the Website and/or the App, personal data will not be in any way disseminated or transferred to third countries located outside the European Union and/or the EEA.



## **9. DATA SUBJECT'S RIGHTS**

As data subject, save for the limitations provided by law, you have the right:

- to obtain confirmation of the existence of your personal data, even if not yet recorded, and that such data are made available to you in an intelligible form;
- to receive indication of and, if necessary, copy: a) the origin and category of personal data; b) in case of automated processing carried out with electronic means, information about the logic involved; c) the purposes and methods of processing; d) the identity of the data controller and the data processors; e) the recipients or categories of recipients to which the personal data may be communicated or which may otherwise get to know said personal data, in particular if they are recipients located in third countries or international organizations; f) where possible, the period of retention of the personal data or the criteria used to determine that period; g) the existence of an automated decision-making and, if so, the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject; h) the existence of adequate safeguards in case of transfer of the personal data to a non-EU country or to an international organization;
- to obtain, without undue delay, the updating and rectification of inaccurate personal data or to have incomplete personal data completed;
- to withdraw at any time, easily and without hindrance, any consents given, using, if possible, the same channels used to give such consents;
- to obtain the cancellation, transformation into anonymous form or blocking of data: a) unlawfully processed; b) no longer necessary in relation to the purposes for which they were collected or subsequently processed; c) if the consent on which the processing is based has been withdrawn and if there is no other legal basis, d) if the user has objected to the processing and there is no prevailing legitimate grounds to continue processing; e) in the event of fulfilment of a legal obligation; f) in the case of data relating to minors. The Data Controller may refuse the erasure only if necessary: (1) for the exercise of the right to freedom of expression and information; (2) for the compliance with a legal obligation, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller; (3) for reasons of public interest in the area of public health; (4) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; (5) for the establishment, exercise or defense of legal claims;
- to obtain the limitation of the processing in the case of: a) contestation of the accuracy of personal data; b) unlawful processing by the Data Controller to prevent their erasure; c) exercise of a right of the user in court; d) verification whether the legitimate grounds of the Data Controller override those of the data subject;
- if the processing is carried out by automatic means, to receive the personal data concerning you without hindrance and in a structured, commonly used and machine-readable format, in order to transmit them to another data controller or – if technically feasible – to obtain direct transmission by Casavo to another data controller;
- to object, in whole or in part, to the processing of personal data: a) for legitimate reasons, related to the particular situation of the user; b) for the purpose of sending communication material, using automated calling systems without the intervention of an operator by e-mail and/or by traditional means by telephone and/or mail;
- to lodge a complaint with a supervisory authority (i.e. the Garante per la protezione dei dati personali).

Where necessary, in the above cases, the Data Controller will inform the recipients to whom the personal data of the user are communicated of the possible exercise of rights by the

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latter, except in specific cases (e.g. when this proves impossible or involves disproportionate efforts).

## **10. EXERCISE OF DATA SUBJECTS' RIGHTS**

The user may at any time exercise the rights set out in the above Section 9 (Data subjects' rights):

- by sending a registered letter to the Data Controller's address

- by sending an email to [gdpr@casavo.com](mailto:gdpr@casavo.com)
- by sending an email to [dpo@casavo.com](mailto:dpo@casavo.com)
- by sending an email to [dpo@casavo.com](mailto:dpo@casavo.com).

## **11. DATA CONTROLLER AND DATA PROCESSOR**

The Data Controller is:

CASAVO MANAGEMENT S.p.A., with registered office in Milan, via Elia Lombardini n. 10. The updated list of data processors and system administrators is kept at the office of the Data Controller, in Milan, via Elia Lombardini n. 10.