PRIVACY POLICY OF www.topcarselect.com

Information notice pursuant to art. 13 of European Regulation 2016/679 (hereinafter "GDPR")

This Application collects some Personal Data from its Users.

Data Controller

CONTRAGO DIGITAL LTD
Evagora Papachristoforou, 18
3030, Limassol, Cyprus
VAT ID: CY10427845Y
Owner contact email: info@contragodigital.com

Data Processor

The Data Processor, whom Users may contact to exercise the rights referred to in Art. 12 of GDPR 2016/679 and/or for any clarification on the protection of personal data, is Contrago Digital ltd, who can be reached by email at **dpo@contragodigital.com**

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies, Usage Data, email, first name, last name, phone number, customer type, title, tax code, VAT number, SDI code, PEC (certified) email, company name, country, address, street number, postcode, password, shipping contact first name, shipping contact last name, shipping company name, shipping country, shipping address, shipping street number, shipping postcode, shipping contact phone number, additional delivery information.

Complete details on each type of data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory. If the User refuses to provide it, this Application may be unable to provide the Service. In cases where this Application specifically states that some Data is optional, Users are free not to communicate such Data without any consequences to the availability or the functioning of the Service.

Users who are uncertain about which Data is mandatory are encouraged to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Application or by the owners of third-party services used by this Application, unless stated otherwise, serves the purpose of providing the Service required by the User, in addition to any other purposes described in this document and in the **Cookie Policy**.

The User assumes responsibility for any third-party Personal Data obtained, published or shared through this Application and confirms that they have the right to communicate or disseminate it, thus relieving the Owner of all responsibility towards third parties.

Mode and place of processing the Data collected

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of the Personal Data.

The processing is carried out using IT and/or telematic tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to other parties involved in the operation of this Application (administration, sales, marketing, legal and system administration staff) or to external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these Processors may be requested from the Data Controller at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing ("opt-out"), without having to rely on consent or any other of the legal bases specified below. This, however, does not apply whenever the processing of Personal Data is subject to European data protection law;
- processing is necessary for the performance of a contract with the User and/or for any pre-contractual measures;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the User may at any time ask the Owner to clarify the specific legal basis that applies to each processing, and in particular whether the processing is based on the law, provided for by a contract or necessary for entering into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located. For further information, please contact the Owner.

The User's Personal Data may be transferred to a country other than the one in which the User is located. To obtain further information on the place of processing, the User can refer to the section containing details about the processing of Personal Data.

The User is entitled to obtain information about the legal basis of Data transfers outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, as well as about the security measures taken by the Owner to safeguard the Data.

If any such transfer takes place, the User can refer to the respective sections of this document or request information from the Owner using the contact details provided at the beginning.

Retention period

The Data is processed and stored for as long as required by the purposes for which it was collected.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained for as long as needed to fulfil such interests. Users may find further information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

When the processing is based on the User's consent, the Owner may retain the Personal Data for a longer period until such consent is withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period in order to comply with a legal obligation or upon order of an authority.

Once the retention period expires, the Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after the expiration of the retention period.

Purposes of processing the Data collected

The User's Data is collected to allow the Owner to provide its Services, as well as for the following purposes: Analytics, Displaying content from external platforms, Managing addresses and, subject to consent, sending email messages for promotional, advertising and marketing activities and for surveys and market research on products and services of third-party companies, Registration and authentication, Remarketing and behavioral targeting, Traffic optimization and distribution, SPAM protection and Contacting the User.

For more detailed information on the purposes of the processing and on the Personal Data relevant to each purpose, the User may refer to the relevant sections of this document.

Details on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Contacting the User

- **Contact request about a listing (this Application)**
  By filling in the contact request form for a listing with their Data, the User consents to its use to respond to the contact request.
  Personal Data collected: first name, last name, email, mobile phone number, postcode, privacy, data processing, data processing for the purpose of communication to third parties.

Registration and authentication

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services.

Depending on what is described below, the registration and authentication services may be provided with the help of third parties. Should this be the case, this Application will be able to access some Data stored by the third-party service used for registration or identification.

- **Direct registration (this Application)**
  The User is registered by the company and is provided with a username and password to access protected documents.
  Personal Data collected: last name, email, address, first name, phone number.

Remarketing and behavioral targeting

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User.

This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity.

In addition to any opt-out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the Network Advertising Initiative opt-out page.

- **AdWords Remarketing (Google Inc.)**
  AdWords Remarketing is a remarketing and behavioral targeting service provided by Google Inc. that connects the activity of this Application with the AdWords advertising network and the DoubleClick Cookie.
  Personal Data collected: Cookies and Usage Data.
  Place of processing: USA – **Privacy Policy** – **Opt Out**.

Analytics

The services contained in this section enable the Data Controller to monitor and analyze web traffic and can be used to keep track of User behavior.

- **Statistical measurement of email communications**
  Contrago Digital LTD may use, where necessary, technical measurement tools, including tracking pixels, within the promotional communications and newsletters sent through its email campaign platform.
  Such tools are used exclusively to record the total number of campaign impressions, by means of anonymous and aggregated statistics.
  The measurement does not involve identifying individual recipients, individual profiling or associating impressions with users' email addresses.
  Any IP addresses acquired when subscribing to the proprietary newsletters are processed separately for purposes related to the registration and documentation of consent and are not used to measure the impressions of email campaigns.
- **Google Analytics (Google Inc.)**
  Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google uses the Personal Data collected to track and examine the use of this Application, to prepare reports and share them with other Google services.
  Google may use the Personal Data to contextualize and personalize the ads of its own advertising

network.
Personal Data collected: Cookies and Usage Data.
Place of processing: USA – **Privacy Policy** – **Opt Out**.

- **Google AdWords conversion tracking (Google Inc.)**
  Google AdWords conversion tracking is an analytics service provided by Google Inc. that connects data from the Google AdWords advertising network with actions performed on this Application.
  Personal Data collected: Cookies and Usage Data.
  Place of processing: USA – **Privacy Policy**.
- **Google Tag Manager (Google Inc.)**
  Google Tag Manager is an analytics service provided by Google Inc.
  Personal Data collected: Cookies and Usage Data.
  Place of processing: USA – **Privacy Policy**.
- **Google Analytics with anonymized IP (Google Inc.)**
  Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google uses the Personal Data collected to track and examine the use of this Application, to prepare reports and share them with other Google services.
  Google may use the Personal Data to contextualize and personalize the ads of its own advertising network.
  This integration of Google Analytics anonymizes your IP address. Anonymization works by shortening Users' IP addresses within the borders of the Member States of the European Union or in other countries party to the Agreement on the European Economic Area. Only in exceptional cases will the IP address be sent to Google's servers and shortened within the United States.
  Personal Data collected: Cookies and Usage Data.
  Place of processing: USA – **Privacy Policy** – **Opt Out**.
- **Facebook (Facebook Inc.)**
  Facebook is a social media and social network.
  Personal Data collected: Cookies and Usage Data.
  Place of processing: USA – **Privacy Policy**.
- **Google plus (Google Inc.)**
  Google plus is a social media and social network.
  Personal Data collected: Cookies and Usage Data.
  Place of processing: USA – **Privacy Policy**.
- **Linkedin (Linkedin Corporation.)**
  Linkedin is a social media and social network.
  Personal Data collected: Cookies and Usage Data.
  Place of processing: USA – **Privacy Policy**.

Displaying content from external platforms

This type of service allows the User to view content hosted on external platforms directly from the pages of this Application and to interact with it.

If a service of this kind is installed, it may still collect web traffic data for the pages where the service is installed, even when Users do not use it.

- **YouTube video widget (Google Inc.)**
  YouTube is a video content visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.
  Personal Data collected: Cookies and Usage Data.
  Place of processing: USA – **Privacy Policy**.
- **Google Maps widget (Google Inc.)**
  Google Maps is a maps visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.
  Personal Data collected: Cookies and Usage Data.
  Place of processing: USA – **Privacy Policy**.
- **Google Fonts (Google Inc.)**
  Google Fonts is a typeface visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.
  Personal Data collected: Usage Data and various types of Data as specified in the privacy policy of the service.
  Place of processing: USA – **Privacy Policy**.

Rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to the processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to obtain information about the Data processed by the Owner, about certain aspects of the processing and to receive a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority or to take legal action.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing on grounds related to their particular situation.

Users should know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Cookie Policy

This Application uses Cookies. To learn more and to read the detailed information notice, the User may consult the **Cookie Policy**.

Additional information about Data processing

- **Legal action**
  The User's Personal Data may be used by the Owner in court or in the stages leading to possible legal action arising from improper use of this Application or of the related Services by the User.
  The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.
- **Specific information**
  At the User's request, in addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data.
- **System logs and maintenance**
  For operation and maintenance purposes, this Application and any third-party services it uses may collect system logs, that is, files that record the interactions and that may also contain Personal Data, such as the User's IP address.
- **Information not contained in this policy**
  More details concerning the processing of Personal Data may be requested from the Data Controller at any time using the contact information.
- **How "Do Not Track" requests are handled**
  This Application does not support "Do Not Track" requests.
  To determine whether any of the third-party services it uses honor "Do Not Track" requests, the User is invited to read their privacy policies.

- **Changes to this privacy policy**
  The Data Controller reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and, if possible, within this Application and/or – as far as technically and legally feasible – by sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.
  Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

- **Personal Data (or Data)**
  Any information that, directly or indirectly, also in connection with any other information – including a personal identification number – allows for the identification or identifiability of a natural person.
- **Usage Data**
  Information collected automatically through this Application (or third-party applications integrated into this Application), including: the IP addresses or domain names of the computers used by the Users who connect to this Application, the addresses in URI (Uniform Resource Identifier) notation, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's response (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system used by the visitor, the various time details of the visit (e.g., the time spent on each page) and the details about the path followed within the Application, with special reference to the sequence of pages visited, and other parameters about the User's operating system and IT environment.
- **User**
  The individual using this Application who, unless otherwise specified, coincides with the Data Subject.
- **Data Subject**
  The natural person to whom the Personal Data refers.
- **Data Processor (or Processor)**
  The natural or legal person, public authority and any other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.
- **Data Controller (or Owner)**
  The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data and the tools adopted, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.
- **This Application**
  The hardware or software tool by which the Personal Data of the Users is collected and processed.
- **Service**
  The Service provided by this Application as described in the relative terms (if available) on this site/application.

- **European Union (or EU)**
  Unless otherwise specified, all references made within this document to the European Union include all current Member States of the European Union and of the European Economic Area.
- **Cookie**
  A small piece of data stored in the User's device.
- **Legal references**
  This privacy statement has been prepared on the basis of provisions of multiple legislations, including Arts. 13 and 14 of Regulation (EU) 2016/679.
  Unless otherwise stated, this privacy statement relates solely to this Application.