

Privacy Policy

We are pleased that you are visiting our website at www.freebid.biz. Data protection and data security when using our website are very important to us. In this Privacy Policy we adhere to our obligations set out in Italy's Data Protection Code ("DPC"), and the EU's General Data Protection Regulation ("GDPR") and inform you about which Personal Data we collect and process and for what purpose and of course about your rights and how you can assert them.

General Information

a) *What is Personal Data?*

Personal data is information that makes it possible to identify a natural person. This includes in particular, your name, date of birth, address, telephone number, e-mail address, but also your IP address. Anonymous data exists if no personal reference to the user can be made.

b) *What is Processing?*

"Processing" means and covers virtually any handling of data.

c) *Who is responsible?*

The person responsible for the processing of Personal Data is Freebid, Via Robert Capa, 7 Piossasco (TO), Italy. Please read this Privacy Policy together with our Cookie Policy and email assistenza@freebid.biz if you have any questions..

d) *Purpose and legal basis of processing*

In accordance with the DPC and the GDPR we need to have both a purpose and a legal basis to process Personal Data. The purposes are:

- providing the website and their functions and contents,
- responding to contact requests and communicating with our customers,
- providing our services, and
- security measures.

Of course, we can only do that if we have at least one of the following legal bases or in other words lawful reasons to do so. Unless specifically described below, we typically link the above purposes to one of the following:

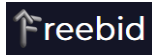
- consent,
- to fulfill our services and carry out contractual obligations,
- to fulfill our legal obligations, and
- to protect our legitimate interests.

e) *Data transfers*

In certain cases, it is necessary to transmit the processed Personal Data in the course of data processing. In this respect, there are different recipient bodies and categories of recipients.

- Service providers in the context of fulfillment processing,
- Companies that provide marketing services,
- Service providers within the scope of providing our website, and
- State authorities and institutions as far as this is required or necessary.

Our main operations are based in Italy and your Personal Data is generally processed, stored and used within Italy. In some instances, your Personal Data may be processed outside Italy. If and when this is the case, we take steps to ensure there is an appropriate level of security, so your Personal Data is protected in the same way as if it was being used within Italy. Where we need to transfer your data outside Italy, we will use approved standard contractual clauses in contracts for the transfer of Personal Data to third countries.



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f) Security

In order to protect the data stored with us in the best possible way against accidental or intentional manipulation, loss, destruction or access by unauthorized persons, we use appropriate technical and organizational security measures. Our security levels are continuously reviewed in cooperation with security experts and adapted to new security standards.

g) Storage and retention

Your Personal Data will be stored by us only for as long as is necessary to achieve the purposes for which the data was collected or - if statutory retention periods exist that go beyond this point and for the duration of the legally prescribed retention period. We then delete your Personal Data. Only in a few exceptional cases is your data be stored beyond this period, e.g., if storage is necessary in connection with the enforcement of and defense against legal claims against us.

What Personal Data do we process?

a) Log files

When you access our website, some access data is recorded automatically and stored in a log file on our website's server. This means if you browse and simply have a look at our website, we process a) the IP address of your computer, b) the date and time of your access, c) the name and URL of the accessed file, d) the browser used, e) the amount of bytes transferred, f) the status of the page request, g) the session ID and g) the referrer URL. The legal basis for processing is our legitimate interest.

b) Hosting of our website

We host our website using the services of [SiteGround Hosting Ltd](#). In this sense SiteGround processes all data and communication data including IP addresses, that are provided to us through our website. This means that all data submitted to our website are transferred to SiteGround. The legal basis for processing is our legitimate interest.

c) Fonts

We have integrated Fonts by [Google LLC](#). To enable the display of fonts, a connection to Google's server is established when our website is accessed. This enables Google to determine which website sent the request and to which IP address the display of the font is to be transmitted. The integration is based on our legitimate interest.

d) Contact options

If you contact us, we process the following data from you for the purpose of processing and handling your request: first name, last name, e-mail address, and, if applicable, other information if you have provided it, and your message. The legal basis for the data processing is our obligation to fulfill the contract and/or to fulfill our pre-contractual obligations and/or our legitimate interest in processing your request.

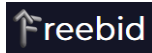
e) Account Registration

If you register, we will request your email address and a password chosen by you in accordance with our registration form. The entry of your data is encrypted so that third parties cannot read your data when it is entered. The legal basis is our legitimate interest and to fulfill our contractual obligations. Of course you can delete your account at any time by contacting us.

f) Profile

A user profile will be created for you based on the information you provide during the sign up (including your email, and password). The data processing carried out in this context is necessary to provide our service on the basis of the requests made by you. The data processing is also based on a legitimate interest, the provision of a contract and your consent.

g) When using our services



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We process Personal Data involved in your use of our services in order to be able to provide our contractual services (your bidoo.com account details to link our services with bidoo.com's via an API, the API connection may also require certain technical data to be transmitted to bidoo.com subject to bidoo.com's [Privacy Policy](#)) as well as to ensure the security of our services and to be able to develop it further. Accordingly, the data is processed on the basis of fulfilling our contractual obligations as well as your consent if applicable.

h) Payment Data

If you make a purchase your payment will be processed via our payment service provider [Stripe](#). Payment data will solely be processed through Stripe, and we have no access to any Payment Data you may submit. The legal basis for the provision of a payment system is the establishment and implementation of the contract.

i) Administration, financial accounting, office organisation, contact management

We process data in the context of administrative tasks as well as organisation of our business, and compliance with legal obligations, such as archiving. In this regard, we process the same data that we process in the course of providing our contractual services. The processing bases are our legal obligations and our legitimate interest.

j) Social Media

We are present on social media on the basis of our legitimate interest. If you contact or connect with us via social media platforms, we and the relevant social media platform are jointly responsible for the processing of your data and enter into a so-called joint controller agreement. The legal basis is our legitimate interest, your consent or, in some cases, the initiation of a contractual service, if any.

k) Direct marketing in the context of a customer relationship

Insofar as you have also given us separate consent to process your data for marketing and advertising purposes, We are entitled to contact you for these purposes via the communication channels you have ticked in this consent.

Advertising

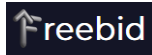
We use Google AdSense, a web advertising service provided by Google. Google AdSense uses Cookies and web beacons to collect information, through the use of which simple actions such as user traffic on our website can be recorded, collected and evaluated. The information generated by the cookie and/or web beacon (including your IP address) about your visit to this website will be transmitted to and stored by Google on servers in the United States. Google uses the information thus obtained to carry out an evaluation of user behavior with regard to the AdSense ads. The IP address transmitted by your browser as part of Google AdSense will not be merged with other Google data. The information collected by Google may be transferred to third parties where required to do so by law, and/or where such third parties process the information on Google's behalf. For further information please refer to our Cookie Policy. The legal basis for the processing of your data is our legitimate interest in the targeted use of advertising.

Your Rights and Privileges

a) Privacy rights

Under the DPC and GDPR, you can exercise the following rights:

- The right to access – You have the right to request copies of your Personal Data. We may charge you a small fee for this service.
- The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request us to complete the information you believe is incomplete.
- The right to erasure – You have the right to request that we erase your Personal Data, under certain conditions.



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- The right to restrict processing – You have the right to request that we restrict the processing of your Personal Data, under certain conditions.
- The right to object to processing – You have the right to object to our processing of your Personal Data, under certain conditions.
- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you have any questions, please contact us.

b) Updating your information

If you believe that the information we hold about you is inaccurate or request its rectification, deletion, or object to its processing, please do so by contacting us.

c) Withdrawing your consent

You can withdraw consents you have given at any time by contacting us.

d) Access Request

In the event you want to make a Data Subject Access Request, please contact us. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.

e) Complaint to a supervisory authority

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The supervisory authority in Italy is the Italian Data Protection Authority, Garante per la protezione dei dati personal, Piazza Venezia 11, 00187 Rome, (www.garanteprivacy.it). However, we would appreciate the opportunity to address your concerns before you contact the Garante per la protezione dei dati personal or any other supervisory authority.

Does this policy change?

We may update our Privacy Policy from time to time. This might be for a number of reasons, such as to reflect a change in the law or to accommodate a change in our business practices and the way we use your Personal Data. We recommend that you check here periodically for any changes to our Privacy Policy. This Privacy Policy was last updated on Saturday, 02. December 2023.

Who should I contact for more information?

If you feel that the above is not sufficient or if you have any queries as regards the collection, processing or use of your Personal Data we are looking forward to hearing from you. We will make every effort to reply as soon as possible and take into consideration any suggestions from your end.