

Privacy Policy

1. Data owner and contact details

The Data provided by you as a User of the Website will be processed by **Joincasa S.r.l.**, C.F./P.IVA 13059621006, with registered office in Via Copernico n. 38 - 20123 - Milan, Italy, contactable at the e-mail address info@joincasa.it, in its capacity as Data Controller (hereinafter, "**Data Owner or Joincasa**").

2. Types of data treated

The Controller may process, in accordance with this Policy, the following personal data collected through the Site:

- personal data (e.g. first name, last name);
- contact details (e.g. e-mail, telephone);
- address data (e.g. address, postcode, city);
- data relating to the property offered or sought (e.g. address, zoning, property composition, characteristics, associated costs, land registry certificates and property provenance, etc.);
- data on its economic capacity;
- data on the composition of your household; payment data (e.g. card holder, number, CVC and CVP, expiry date);
- navigation and geolocation data, collected via cookies and in accordance with the cookie policy provided below (e.g. IP address).

3. Purpose, Legal basis and explanation

Purpose	Legal Basis	Explanation
a) Site Registration	Performance of the contract and/or pre-contractual measures	We will process your personal data for the creation of a personal account in order to allow you to place advertisements, save your searches, view the status of your activities and receive updates, change your personal settings and update your account, send you the newsletter
b) Purchase of services for paid services	Performance of the contract and/or pre-contractual measures	We will process your personal data for the purpose of processing your purchase order for the activation of the paid service.
c) Purposes administrative-accounting	legal requirement	We will process your personal data to fulfil any legal, accounting and tax obligations.

d) Contact & Customer Care	Performance of the contract and/or pre-contractual measures	We will process your personal data if you have requested information via the Platform's contact form, email or telephone contact.
e) Communications with promotional content	Consent	We will process your personal data in order to send - via e-mail - communications with promotional, informative and/or advertising content in relation to Joincasa services. You may interrupt the receipt of these communications, without any consequences for you (other than the fact that you will no longer receive further communications of this type from Joincasa) by sending a request to info@joincasa.it .
f) Soft spam	Legitimate interest	We will process your personal data in order to send you - via e-mail - communications regarding services similar to those you have purchased through the Joincasa Site. You may interrupt the receipt of these communications, without any consequences for you (other than the fact that you will no longer receive further communications of this type from Joincasa) by sending a request to info@joincasa.it .
g) Transfer of data to third parties for marketing purposes	Consent	If you authorise us, we may disclose your data to third parties and business partners for activities of a commercial nature.
h) Detect or prevent fraudulent activities	Legal Obligation	We may need to process your personal data in the event of third-party attacks on our computer systems or our site.

i) Compliance with orders of judicial or other public authorities	Legal Obligation	We may have to provide your data to judicial or other public authorities due to legal obligations or express requests.
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4. Nature of assignment

In relation to purpose **a)** of the preceding paragraph, the provision of personal data is optional. However, failure to provide it will make it impossible for the Controller to allow registration on the Site and the related functions. In relation to purposes **b), c), h)** and **i)** of the previous paragraph, the provision of personal data is mandatory. Failure to provide the data shall make it impossible for the Controller to proceed with the conclusion of the contract and the management of all related activities (e.g. payment) as well as, the performance of administrative-accounting purposes connected with the fulfilment of obligations provided for by the regulations in force. With reference to purpose **d)** of the previous paragraph, the provision of personal data is optional. However, failure to provide it will result in the impossibility of access to customer service activities.

With reference to the purpose **e)** of the previous paragraph, the provision of personal data and consent to their processing is optional. However, failure to provide consent will result in the impossibility for the Controller to proceed with sending promotional communications relating, for example, to new arrivals and exclusive offers, unless there are grounds for the soft spam referred to in point **f)**.

In relation to purpose **g)**, the provision of personal data and consent to their processing is optional. The use of certain services of the Platform may require the processing of personal data of third parties sent by you to Joincasa. With respect to these hypotheses, you position yourself as an autonomous data controller, assuming all the obligations and responsibilities of the law. In this sense, you grant Joincasa the broadest indemnity in relation to any dispute, claim, request for compensation for damages from processing, etc. that may be received by Joincasa from third parties whose personal data has been processed through your use of the Platform functions in violation of the applicable data protection regulations. In any case, should you provide or otherwise process personal data of third parties in the use of the Platform, you guarantee as of now and assume all related responsibility - that this particular processing hypothesis is based on an appropriate legal basis in accordance with article 6 of the GDPR that legitimises the processing of the information in question.

5. Method of data processing

Your personal data are processed by computer and/or on paper and are protected by appropriate security measures to ensure confidentiality and security. No fully automated decision-making process is used.

6. Data communication

For the purposes mentioned in Section 3, your personal data may be transferred to the following categories of recipients, located within the European Union:

- to our internal administrative staff;
- service providers that provide assistance and/or consultancy to the Data Controller with reference to the activities of the sectors (e.g. legal and accounting, insurance, dedicated to debt collection, fraud control and/or all the inspections on the property of interest to be carried out at Municipal Technical Offices, Land Registry and/or other Institutions, Institutions or Registers, patronages, companies or entities appointed by us as responsible for the specific processing);
- parties who need access to the data for purposes connected with the contractual relationship in place with Joincasa, to the extent strictly necessary to perform their tasks (such as, for example, banks and credit institutions, IT service providers, hosting providers, communication and marketing agencies);
- Joincasa's partners, for whom the provision of data is necessary in order to guarantee the services purchased;
- subjects and authorities whose right of access to personal data of Users is expressly recognised by law, regulations or measures issued by the competent authorities.

- These recipients, depending on the circumstances, will process the personal data in their capacity as data controllers or data processors.
- These entities may act, depending on the circumstances, as autonomous data controllers or data processors.
- A full list of the Persons in Charge can be obtained by contacting the Controller.

7. Data transfers abroad

Personal data may be freely transferred outside the national territory to countries within the European Union. Any transfer of the User's personal data to countries outside the European Union will, in any event, take place in compliance with the appropriate and adequate safeguards for the purposes of such transfer in accordance with the applicable legislation and in particular Articles 45 and 46 of the GDPR.

8. Interaction with third-party platforms

Through the pages of the Site you can interact with third-party platforms (e.g. Facebook). In order to find out what information is acquired by the third-party platforms, you can consult their respective privacy policy.

9. Data retentions periods

The User's personal data will be kept for the period of time necessary to pursue the specific purposes for which they were collected, as set out in this notice, and in any event:

- or Contractual Purposes and Legitimate Interest Purposes, personal data shall be retained for a period equal to the use of the services referred to on the Site and for 10 years thereafter, except where retention for a later period is required for litigation, requests by competent authorities or under applicable law;
- for Marketing Purposes, personal data will be retained for the duration of the User's registration with the Site, and thereafter for a period of 12 months after deactivation or deletion;

Once the above-mentioned terms have expired, the User's data may be deleted, anonymised and/or aggregated.

10. Rights of the interested parties

You have the right, at any time, to ask the Data Controller for access to your personal data (Art. 15), rectification (Art. 16) or erasure (Art. 17) of the same, or restriction of processing (Art. 18) or to object to their processing (Art. 21), to the portability of your personal data (Art. 20) and finally to lodge a complaint with the Supervisory Authority (Personal Data Protection Authority). You will be able to assert your rights as expressed in EU Regulation 2016/679 by contacting the Data Controller, by sending an e-mail to info@joincasa.it or by writing to the Data Controller's office indicated above.

11. Changes and updates

The Controller reserves the right to make changes to this policy whenever necessary. Users will be notified of relevant changes and additions via the Website.