

# Privacy Policy

## INTRODUCTION

For Newlab S.R.L its privacy is important.

We have compiled this Privacy Policy (hereinafter also referred to as "Information") in a simple and understandable way, in order to help you understand who we are, what personal data we collect about you, why we collect it and what we do with it. Please note that personal data (hereinafter referred to in this Notice, also "Data" or "Your Data") means any information or set of information from which it is possible for us to personally identify it, directly or indirectly, in particular referring to a specific number or identification code (including, by way of example, name and surname, e-mail address, telephone number, etc.).

We invite you to take a few minutes to fully read this Statement.

If you do not accept this Policy, please do not provide us with your data.

## WHEN DOES THE INFORMATION APPLY?

The Disclosure covers the ways in which we collect and use your data, for example, when:

visit or use our websites, our applications and our social media channels for consumers and customers;

purchases and uses our products, services, systems or applications;

sign up for our newsletter;

provides us with its products or services;

contact our customer support service;

adheres to our commercial events;

or interacts with us in any other way, as a consumer, commercial customer, partner, (sub) supplier, contractor or other person linked to us by a business relationship.

## WHO IS NEWLAB SRL?

We at Newlab SRL are an Italian company that deals with the development and implementation of electronic devices for the control of lighting systems.

When using the terms "We" "Ci" or "Company", this Notice refers to the holder of the processing of your data referred to in this Notice, namely Newlab SRL (Via Greto di Cornigliano 6R - 16152 - Genoa - Italy PI 01443720998 ) with whom he had, has or will have a business relationship, or who decides which data will be collected and how they will be used

## WHAT TYPES OF DATA THAT REGARD THEY COLLECT?

Depending on who you are (eg customer, consumer, supplier, business partner, etc.) and how you interact with us (eg online, offline, by phone, etc.), we may process different data related to you . By way of example, we may collect your data when you visit or use our websites, our applications

and our social media channels for consumers and customers when you purchase and use our products, services, systems or applications when you subscribe to our newsletter, when you download a software update, when it provides us with its products or services, when you contact our customer support service, when you join our business events, when you participate in our contests, promotions and surveys or when you interact with us in any other way.

Below, you can find an overview of the categories of Data we may collect:

### **Information that you provide us directly**

Data categories	Examples of data types
Personal identification data	First Name, Last Name
Contact	Email
Credentials to access the account	User and Password

Finally, for security reasons, if you visit our premises we may also record your data by video or other electronic, digital or wireless surveillance system or device (eg CCTV cameras).

### **Information collected by us automatically**

When you visit or use our websites or applications, subscribe to our newsletters or otherwise interact with us through our digital channels, in addition to the information provided directly we can also collect information sent to us by your computer, mobile phone or other access device. For example, we can collect:

Data categories	Examples of data types
Device information	Hardware model, imei code and other unique identifiers of the device used, mac address, ip address, operating system version and device settings used to access the services
Log information	Time and duration of use of our channel or digital product
Location data	Data on its actual location (derived from its IP address or from other geographic location-based technologies) that can be collected when activating location-based products or functions, such as our applications
Other information about the use of our digital channels or products	Used applications or visited websites, links on which you click inside our advertising e-mails, data collected by the motion sensors

### **Information we can gather from other sources**

To the extent permitted by current legislation, in addition to our websites, applications and other digital channels, we may also obtain information from other sources, such as public databases, joint marketing partners, social media platforms and other third parties. . For example, depending on

your social media settings, if you choose to link your social media account with your Newlab Smarthome account, some of your social media account information will be shared with us; this may include data that is part of your profile.

## HOW DO WE USE YOUR DATA?

We may use your data for various legitimate reasons and commercial purposes.

Below, find an overview of the purposes for which we can process your data:

Purposes	Examples
Evaluation and (new) screening of (potential) customers, suppliers and / or business partners	Due diligence activities
Stipulation and signing of contracts	Sales, billing, shipping of products or services, registration to mobile applications or websites, warranty, service communications, account management
Provision of assistance (upon request)	Provision of assistance through communication channels, such as customer support or contact center
Direct Marketing	Promoting contacts with consumers and / or business customers (in some countries only), e-mail marketing, market research, customizing your experience with presentation of products and offers tailored to you (on our sites, through our applications or by other means of communication)
Security and protection of our interests / assets	Implementation and maintenance of technical and organizational security measures, conduct of audits and internal investigations, conduct of investigations to identify any conflicts of interest
Compliance with legal obligations	Communication to government bodies or supervisory authorities, depending on the situation in the country in which we operate, of data such as tax and social security deductions, accounting and declaration obligations, conduct of legal compliance audits, compliance with inspections and to other requests by government agencies or other public authorities, it replies to procedural acts such as invitations to appear, assert or defend rights and operate remedies provided by law, and management of claims or internal claims
Defense in case of legal actions	Initiation, exercise or defense of legal actions of which we are or could be part

If we ask you to inform us of your data and you decide not to provide them, in some cases we will not be able to make available all the features of our products, services, systems or applications.

Furthermore, we may not be able to respond to your requests.

## **HOW DO WE USE YOUR DATA FOR MARKETING PURPOSES?**

Newlab SRL will be able to send regular promotional communications regarding its products, services, events and promotions.

Such promotional communications may use the "NEWLAB" trademark and be sent via various channels, such as: e-mail, telephone, SMS, mail and third-party social networks.

In order to offer you the best personalized experience, these communications can be modulated according to your preferences (for example, which you indicate, which we deduced from your visits to the site or based on the links you clicked in our e-mails ).

When required by the regulations in force, we will ask for your consent before proceeding with the aforementioned activities.

Furthermore, we will give you the opportunity to withdraw your consent at any time (opt-out).

In particular, you may always withdraw your consent to receive promotional e-mails following the cancellation instructions contained in each e-mail. When registering for a Newlab Smarthome account, you may be given the opportunity to change your preferences on how to communicate within the corresponding section on our site or application. You can always contact us (find the details below, in the section "What are your options?"), In order to withdraw consent to receive promotional communications.

Please note that even in case of revocation of consent to receive promotional communications, you may still receive from our administrative communications, such as technical updates on our products, order confirmations, communications regarding the activities of your account and other important notices.

## **ON WHICH LEGAL BASE DO WE USE YOUR DATA?**

In order to be able to process your data, we can rely on different legal bases, including:

your consent (only when necessary or permitted by law). In the event that we should rely on your consent as a legal basis for the processing of your data, you will have the right to withdraw your consent at any time;

the need to establish a contractual relationship with her and to fulfill our obligations under the contract;

the need for us to comply with legal obligations and to establish, exercise or defend against legal actions;

the need to pursue our legitimate interests, including:

or make sure that our networks and our information are secure

or manage and in general conduct our commercial activity within the Company

o preventing or investigating suspected or actual violations of the law, breaches of contracts with commercial customers or cases of non-compliance with the General Business Principles of Newlab SRL

the need to respond to your requests;

the need to protect a person's vital interests;  
any other legal basis permitted by local laws.

## **WHEN SHARING YOUR DATA?**

Your data will not be shared, except in the limited cases indicated below. If necessary to achieve the purposes described in this Notice, we may communicate your data to the following subjects:

Access to your data within Newlab SRL will be granted only to those who need to get to know it;  
Service providers: like many companies, we could outsource some data processing activities to trusted service providers, with the task of performing functions and providing services, such as, for example, ICT service providers, consultants, shippers;

Business partners: we may share your data with our trusted business partners, so that they can provide the requested services;

Public and government authorities: when required by law or necessary to protect our rights, we may share your data with authorities that regulate or have jurisdiction over Newlab SRL;

Professional consultants and others: we may share your data with third parties, including professional advisors, such as banks, insurance companies, auditors, lawyers, accountants, other professional advisors;

Third parties in relation to corporate transactions: from time to time, we may also share your data in the course of corporate transactions, such as the sale of company or business unit to another company, or a reorganization, merger, joint venture, or other sale of company, assets or shareholdings (also in connection with bankruptcy or insolvency proceedings).

## **WHEN WE MOVE YOUR DATA ABROAD?**

Depending on the location of our servers we may record data on non-Italian territory. As a result, your data may be processed outside the country in which you live, if necessary to achieve the purposes set out in this Statement.

If you are in a member state of the European Economic Area, we may transfer your data to countries outside the European Economic Area. Some of these countries are recognized by the European Commission to ensure an adequate level of protection. With regard to transfers from the European Economic Area to other countries that are not recognized by the European Commission to ensure an adequate level of protection, we have put in place adequate measures to protect your data, such as organizational and legal measures (eg business rules binding and standard contractual clauses approved by the European Commission). You can obtain a copy of these measures by contacting the Newlab SRL Privacy Office (you will find the contact details below, under "What are your options?").

## **HOW LONG DO WE STORE YOUR DATA?**

We retain your data for the time necessary to achieve the purposes for which they were collected (for information on these purposes, see the section "How do we use your data?" Above). Please keep in mind that, in some cases, a conservation may be requested or permitted by law for longer periods. The criteria adopted to establish the duration of the data retention period are as follows:

How long is the data necessary to provide us with our products or services, or to carry out our business?

Do you have an account with us? In this case, we will retain your data as long as the account is active or as long as it is necessary to provide the services.

Are we subject to legal, contractual or similar obligations regarding the storage of your data? Examples may include regulations that require mandatory retention of data in the relevant jurisdiction, orders from government authorities regarding the retention of data relevant to an investigation, or data that must be kept for litigation purposes.

## **HOW DO WE PROTECT YOUR DATA?**

To protect your data, we will take appropriate measures in line with applicable laws and regulations on data protection and security, including asking our service providers to take appropriate measures to protect your privacy and security. Data. Depending on the technological development, implementation costs and the nature of the data to be protected, we adopt technical and organizational measures to prevent risks, such as the destruction, loss or alteration of your data and unauthorized disclosure or access to the same.

## **WHAT ARE YOUR RESPONSIBILITIES?**

We would like to remind you that you have a duty to make sure, as far as you know, that the Data you provide us are correct, complete and updated. In addition, if you share data with other people with us, it is your obligation to collect such Data in accordance with local legal requirements. For example, you must inform the other persons, whose data you provide, of the content of this Policy and obtain their consent. .

## **WHAT ARE YOUR OPTIONS?**

Our intent is to provide you with access to your data. As a general rule, you will be able to independently check your data (eg by accessing your account) and update, modify or, if permitted by law, delete them. In this case, we strongly encourage you to take control of your data.

You can always contact our Privacy Office, if you wish:

- review, modify or delete the data provided to us (to the extent that Newlab SRL is not otherwise authorized or required to keep them);
- oppose some processing operations of the Data (for example, withdraw consent to receive promotional communications);
- receive a copy of your data (in a normal format readable by an automatic device, to the extent required by current legislation);
- ask any other questions about the protection of your data at Newlab SRL.

The contact details of our Privacy Office are the following:

mailing address: Newlab SRL - Via Greto di Cornigliano 6R - 16152 Genoa Italy

We will do our best to deal promptly and freely with your request, except when it would require a disproportionate effort. In some cases, we may ask you to identify yourself, before processing your request. If you are not satisfied with your response, you can contact the competent supervisory authority in your jurisdiction.

## **HOW DO WE USE COOKIES AND OTHER TRACING TECHNOLOGIES?**

For more information on how we use cookies and other tracking technologies, please read our cookie policy located at the bottom of this document

## **WE COLLECT DATA FROM MINORS?**

We do not intentionally collect data from individuals under the age of 18.

Special note for individuals under the age of 18: if you are under 18, we advise you to speak with one of your parents or your guardian and obtain authorization before sharing your data with us; Special note for parents of persons under the age of 18: we recommend that you monitor and monitor the use of our products, systems, services, applications (including websites and other digital channels) by your children in order to make sure that they do not share data with us without your permission.

## **WHEN WILL WE UPDATE TO THIS PRIVACY POLICY?**

This notice may vary over time, to be always updated visit this document to ensure you always have the latest version. Check the update date at the end of the document

## **Information on cookies Newlab SRL**

Newlab SRL aims to make the online experience and interaction with our websites more informative, relevant and supportive as possible. We use cookies or similar techniques for this purpose. We believe it is important to tell the user what cookies are used by our website and for what purposes. This will help to protect privacy, while ensuring the ease of use of our website as much as possible.

### **What are cookies?**

Cookies are small text files that are stored on the user's terminal (computer or mobile device) when visiting certain websites. Newlab may use similar techniques, such as pixels, Web beacons, device fingerprints, etc., which are collectively defined " cookie ".

### **Why are cookies used?**

Cookies can be used for different purposes. Firstly, cookies may be required for the website to function properly. For example, without cookies, it would be difficult to remind a website of access by the user or products added to the cart. Those of this type are called required cookies.

Cookies can also be used to analyze the way in which you use a website, to count the number of visitors, for information on how you can improve the website. We do not link the website usage statistics and other reports to the individual people. Those of this type are called analytical cookies.

Thirdly, social media cookies are used to allow social media to be integrated into the website, so that you can instantly add or share a page or product on the service of your favorite social media.

A fourth important use of cookies is to allow online advertising, which can be customized to display the most relevant and interesting advertisements for the user, both inside and outside the Newlab websites. This is done through advertising cookies (targeted)

Note that the use of cookie settings on our website may not result in the deletion of any cookies already set. You can delete it via your browser settings as described below, after changing the cookie settings on our website.

If you visit a Newlab website for visitors outside the EU, you can use your browser settings to make choices about cookies and privacy.

### **Manage or disable cookies in the browser**

Keep in mind that Newlab SRL does not currently use a technical solution that allows us to respond to the browser's "Do Not Track" signals. In addition to using the cookie settings section on our website, at any time, you can manage the settings related to cookies in your browser settings. Please note that your browser settings may not offer the same ease of use as the cookie settings on our website. If you simply disable all cookies or all our cookies in your browser settings, you may experience a malfunction of cookies. Some sections or features of our websites, because the browser can prevent the setting of cookies that are functionally necessary. Therefore, we recommend that you use Cookie settings on our website, rather than disable all cookies through your web browser.

Further information on how to disable cookies or manage cookie settings for your browser are available at the following addresses:

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

Firefox <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Internet Explorer: <http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies>

Safari: <http://help.apple.com/safari/mac/8.0/#/sfri11471>

Cookies that guarantee the correct functioning of websites (cookies required)

### **Our websites can use cookies for:**

Transferring information from one page to the next, for example when filling out a long questionnaire or entering many details to place an order online  
memorize preferences, such as language, location, number of search results to be displayed, and so on  
store settings for optimal video display, such as buffer size and screen resolution details  
read your browser settings to ensure optimal display of our website on the screen  
detect any improper use of our site and our services, for example by recording a series of unsuccessful consecutive login attempts  
upload the website uniformly so that it is always accessible  
offer the possibility to store the access status so as not to enter the access details every time  
offer the possibility to add a comment on our website  
optimize our website in real time, depending on how you use the website, for example by making sure that a field in a module lights up or flashes after a period of inactivity

### **Cookie che ci consentono di misurare il livello di utilizzo del sito Web (cookie analitici)**

**Il nostro sito Web può utilizzare i cookie analitici per:**

keep track of the number of users who visit our web pages  
keep track of the time each user spends by visiting our web pages  
detect the sequence of the various pages of our website visited by users  
identify the parts of the site that need to be improved  
optimize the website  
request feedback on specific parts of our website

Cookies for sharing the contents of our website through social media (cookies for social media)  
These cookies can allow:

users connected to the selected social media can share and "like" certain content on our website

These social media can also collect personal data for their own purposes. Newlab SRL has no control over the way in which these social media use personal data. For more information on cookies set by these social media and on the data that may possibly collect, we invite the user to consult the respective privacy policies. Below is a list of the privacy policies relating to the social media channels most used by Newlab SRL:

Facebook  
Google+  
Twitter  
Pinterest  
LinkedIn  
YouTube  
Instagram  
Vimeo

Cookies for displaying ads and targeted content (targeted advertising cookies)

In order to adapt information and publicity based on user interest and relevance, we try to understand the probable interests of users based on visits and browsing behavior on Newlab websites and other third party websites. Based on these interests, we develop a segmented profile and then adapt the content and advertisements on our site to the various customer groups.

Even third parties who set cookies on our website may try to identify the user's interests in this way and this information may also be used to provide content or advertisements that may appear of greater interest to the user on other sites. Web, not Newlab. In this case, information relating to the visit to the current website can be combined with information from previous visits on websites other than our own.

Even if these cookies are not used, note the possibility of displaying advertisements on our site; such ads will not be tailored to your interests and may vary depending on the content of the website. This type of content-related online advertising is comparable to television advertising: while watching a TV cooking program, just to make an example, advertising of kitchen products is often proposed during commercial breaks.

### **We can use targeted advertising cookies for:**

register your visit on the websites and therefore evaluate your interests  
run a check to see if you clicked on an advertisement  
keep track of the number of users who click on an advertisement  
acquire information about your browsing behavior that will be transferred to other websites

third-party services to be used to display advertisements tailored to needs, interests or preferences determine which types, technologies and advertising networks are most effective for us display advertisements on products that are selected, searched, or to which the user has previously been interested in (retargeting)

keep track of already viewed advertisements so that the same ads are not always shown

display more interesting advertisements based on your use of social media

send questions or opinions about our products and, on this basis, display advertisements that are likely to be of greater interest to you

reviews sent by the user to be reused as product recommendations on other pages

be connected to authorized online dealers, to be informed about prices, availability and conditions of purchase of the Newlab product of interest and track purchase preferences

Establish selected advertisements before making a purchase on our website

keep track of the number of orders generated through advertising, as well as the relative pecuniary value

receive direct marketing e-mails tailored to suit your interests (in case of explicit consent for the receipt of such e-mails) or direct marketing e-mails on products similar to those already purchased (in case of non-explicit rejection for the receipt of such e-mails).

associating multiple devices (e.g., phone, tablet, laptop) to a visitor so that you can monitor whether an ad on a device may have triggered an action (such as a purchase) on another device (known as "cross-monitoring of devices").

### **Concluding remarks:**

Newlab SRL has the right to update this cookie policy periodically, for example following changes affecting our website or the cookie regulations. We reserve the right to change the content of our cookie policy and the cookie list at any time without notice. The new cookie policy will be effective from the time of its publication. If you do not intend to accept the terms of the updated information, you are invited to change your preferences or to stop using the Newlab websites. If you continue to access or use our services after the above changes have become effective, you agree to be bound by the terms contained in the new cookie policy. The updated information is available on this web page.

In case of further questions and / or comments, you can contact us at [info@newlablight.com](mailto:info@newlablight.com) or access our contact page

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