

PRIVACY POLICY

Last updated: 11/09/2025

1) Controller and contacts

Trendly di Catarzi Niccolò – Via Borromeo 116, 50026 San Casciano in Val di Pesa (FI) – Italy.

VAT No.: 07068610489 – **Tax Code:** CTRNCL97B16D612Z

E-mail: ladinumoil@gmail.com

DPO: not appointed.

2) Categories of data processed

- **Browsing data** (logs, IP, device identifiers).
- **Form and contact data** (name, e-mail, messages; including WhatsApp/Calendly).
- **Purchase and shipping data** (name, surname, addresses, phone, e-mail).
- **Payment data** (handled by Stripe).
- **Marketing/analytics data** (GA4, Clarity, Meta/LinkedIn Ads events, via cookies/IDs with consent).
- **Ladium app data** (choice/renaming of symbolic olive tree, progress, badges, symbolic CO₂ certificates).

3) Purposes and legal bases

- **Performance of the contract:** order management, shipping, invoicing, activation and use of digital services (Art. 6.1.b GDPR).
- **Legal obligations:** accounting/tax compliance (Art. 6.1.c).
- **Service communications:** email/SMS/WhatsApp regarding the order and the app (Art. 6.1.b).

- **Newsletter and contacts:** sending promotional communications with **consent** (Art. 6.1.a).
- **Marketing and profiling:** behavioral analysis on the site, conversion measurement, and **ad personalization** (retargeting) via Meta/LinkedIn/GA4/Clarity, with **consent** (Art. 6.1.a). *Basic logic:* we observe interactions on the site (e.g., pages viewed, carts, purchases) to create segments and display personalized ads/offers. *Consequences:* you will receive more relevant advertising; no decisions with legal or similar effects.
- **Security and fraud prevention:** technical and anti-fraud checks (legitimate interest: Art. 6.1.f, with balancing available upon request).

4) Processing methods and security measures

We process data using IT/telematic tools, adopting appropriate technical and organizational measures (access controls, in-transit encryption, backups, logging, minimization).

5) Retention

- **Invoicing/shipping data:** 10 years (tax obligations).
- **Payment data:** held by Stripe for the time necessary for the transaction/anti-fraud.
- **Marketing/newsletter data:** until **consent is withdrawn** or deletion is requested.
- **Ladium app data:** **365 days** from activation, then deletion/anonimization.
- **Browsing logs:** up to **12 months**, unless required for security.

6) Recipients

Technical providers (e.g., **OVHcloud** hosting), payment platforms (**Stripe**), marketing/analytics tools (**Google**/GA4 & Tag Manager, **Microsoft** Clarity, **Meta** Ads, **LinkedIn** Ads), appointment tools (**Calendly**), messaging (**WhatsApp Business**), couriers, consultants, and parties authorized for legal obligations.

7) Transfers outside the EU

Some providers are established in or process data in non-EU countries (e.g., the USA).

- If the provider is **certified** under the **EU-US Data Privacy Framework**, the transfer is based on the European Commission's **adequacy decision**.
- Alternatively, we use **Standard Contractual Clauses (SCCs)** and, where necessary, **supplementary measures** (encryption/pseudonymization, access limitations).

Further details (list of providers and transfer bases) are available upon request.

8) Data subject rights

You may exercise: **access, rectification, erasure, restriction, portability, objection**, and **withdrawal of consent** at any time without affecting the lawfulness of processing based on consent before its withdrawal.

You may lodge a complaint with the **Italian Data Protection Authority** (www.garanteprivacy.it).

To exercise your rights: [**ladinumoil@gmail.com**](mailto:ladinumoil@gmail.com).

9) Minors

The site is not intended for children under 14; if you believe a child has provided us with data without parental consent, contact us for removal.

10) Changes

We reserve the right to update this notice; changes will be published on the site with the date indicated.
