

PRIVACY POLICY — ALUVIBE WEBSITE

Dear User,

This notice is provided pursuant to Articles 13-14 of Regulation (EU) 2016/679 ("GDPR") to inform you about the personal data collected through this website and about the rights you may exercise regarding its collection, storage and erasure.

Data Controller

The Data Controller for the personal data collected through this website is AluVibe di Omar Griffa, a sole proprietorship (impresa individuale) registered in Italy, VAT/Tax code 13468120012, registered office at Via Torino 6, 10060 Pinasca (TO) and operating address at Via Corradino 20, 10024 Moncalieri (TO), Italy.

Certified email (PEC): aluvibe@ionospec.it — Email: info@aluvibe.it

Note: as a sole proprietorship, there is no separate "legal representative" — the Data Controller is Omar Griffa personally, as the owner of the business. Consider setting up a dedicated privacy contact address (e.g. privacy@aluvibe.it), distinct from the general inbox.

Key definitions

- "Personal data" (Art. 4(1) GDPR): any information relating to an identified or identifiable natural person.
- A natural person is identifiable when they can be recognised, directly or indirectly, by reference to an identifier such as a name, location data, an online identifier, or factors specific to their physical, genetic, mental, economic, cultural or social identity.
- "Processing" (Art. 4(2) GDPR): any operation performed on personal data (collection, recording, storage, consultation, use, disclosure, erasure, etc.), whether or not by automated means.

Place of processing and parties with access

Processing takes place at the addresses above and is handled directly by the Data Controller, Omar Griffa, as the business has no employees or internal staff with access to the data.

The website is an online store (WooCommerce) through which products and event tickets can be purchased, including without creating an account ("guest checkout"). In connection with purchases, data is also processed by the following third parties:

- payment service providers: WooPayments (WooCommerce Payments, the credit/debit card payment service built into WooCommerce, operated by Automattic Inc. in partnership with Stripe Inc. for the technical processing of payments), PayPal, Satispay, and the customer's own bank in the case of a bank transfer. For the portion of data needed to process the payment, these parties typically act as independent Data Controllers (not as mere Processors on AluVibe's behalf) — the data subject is invited to also consult their respective privacy notices;
- Sistemi Sportello Cloud, the invoicing software used to issue tax documents for orders;
- the accountant/tax advisor responsible for bookkeeping;
- technical service providers for the website (e.g. hosting, email delivery, Google Analytics — see the Cookie Policy).

Where these parties act on AluVibe's instructions, they are appointed as Data Processors under Art. 28 GDPR.

Under WooPayments, only credit/debit card payment is enabled; other available methods (e.g. instalment options such as Klarna, Affirm, Afterpay) are disabled.

As the business currently sells only virtually-delivered products/tickets (no physical shipping), there are currently no couriers or shipping companies among the data recipients. This section should be updated if physical shipping is introduced in the future.

Categories of data processed

Data is provided voluntarily by the user:

- through any contact/information request forms on the site, or by emailing the addresses shown on the site (name, email, phone number, message content);
- at checkout (including as a guest, without creating an account): first and last name, billing address, email, phone number, order details; actual payment data (card number, PayPal/Satispay credentials) is collected directly by the respective payment service providers and does not pass through or get stored on AluVibe's systems.

Browsing data is also collected via technical cookies and, subject to consent, statistics cookies (Google Analytics and the order-attribution tool — see the Cookie Policy for details).

The Controller does not use any automated decision-making process.

Optional nature of data provision and legal basis

Providing data through the contact form or by email is optional, free and explicit; failure to provide it may make it impossible to process the request. Providing data at checkout, on the other hand, is necessary to perform the sales contract: without it, the order cannot be completed. No data is processed for marketing or promotional purposes unless you explicitly subscribe to a newsletter, where available.

For sales conditions, delivery of digital products/tickets, and the right of withdrawal, please see the Terms and Conditions of Sale already published on the site.

Purpose, legal basis and retention period

Purpose	Legal basis	Retention period	Transfer outside the EU
Responding to information requests sent via form/email	Pre-contractual measures requested by the data subject / consent	Max. 12 months from the request, unless otherwise required by law	No
Managing the purchase order (products/event tickets) and fulfilling the resulting contract	Performance of a contract (Art. 6(1)(b) GDPR)	For the duration of the relationship, plus 10 years under Italian accounting-record retention obligations (Art. 2220 Civil Code and tax law)	No, except as noted below for payment providers
Processing the payment (WooPayments/credit and debit card, PayPal, Satispay, bank transfer)	Performance of a contract	As per each payment provider's own policy	Yes for PayPal and for WooPayments (processed by Stripe Inc., a US-based group), under the applicable EU-US data transfer framework/standard contractual clauses; No for Satispay and bank transfer (Italian/EU operators)
Invoicing and accounting/tax compliance	Legal obligation (Art. 6(1)(c) GDPR)	10 years (Art. 2220 Civil Code and tax law)	No, unless Sistemi Sportello Cloud (invoicing software used) states otherwise
Website usage statistics and order-source attribution (Google Analytics, Sourcebuster)	Consent (via cookie banner)	As configured in the tool (typically 14 months for GA4, unless set otherwise)	Yes for Google Analytics — to Google LLC (USA), under the applicable EU-US data transfer framework / standard contractual clauses; No for the attribution tool (processed internally within WooCommerce)

The Google Analytics row remains indicative: the actual GA4 configuration should be confirmed (IP anonymisation, data processing region, retention period).



How data is processed

Data is processed on paper, electronically and via telematic means, with technical and organisational measures adequate to ensure its confidentiality and security, in line with the principles of accuracy, currency and relevance to the stated purposes.

Data subject rights

With respect to the data processed, the data subject may exercise the rights set out in the GDPR:

- right of access (Art. 15) — to know about ongoing processing and obtain a copy;
- right to rectification (Art. 16) — to correct inaccurate data;
- right to erasure / "right to be forgotten" (Art. 17);
- right to restriction of processing (Art. 18);
- right to data portability (Art. 20);
- right to object to processing (Art. 21);
- right not to be subject to automated decision-making (Art. 22).

These rights, as well as withdrawal of consent at any time (without affecting the lawfulness of processing carried out before withdrawal, Art. 7 GDPR), may be exercised by writing to info@aluvibe.it.

Right to lodge a complaint

The data subject has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali — www.garanteprivacy.it) if they believe the processing violates Regulation (EU) 2016/679.