NOZIO®

NOZIO SRL
Via delle industrie 17/A, VEGA Parco Scientifico
e Tecnologico, Edificio Lybra (4° piano)
30175 - Venezia Marghera

SEDE LEGALE
Via Zandonai 6/6, 30174 - Venezia Mestre
PIVA 04173700271
R.E.A. VE-372013 | Cap. Soc. 50.000€

www.nozio.com info@nozio.com +39 041 8306184

Privacy Policy

Last update: 05.10.2026

What is this document? Pursuant to art. 13 European Reg. n. 679/2016 ("**General Data Protection Regulation**" or "**GDPR**") and in compliance with the principles contained therein, Nozio S.r.l. intends to inform each user (the "**User**") about the processing of personal data happening on the websites nozio.com, nozio.biz and nozio.travel ("**Websites**").

Controller and contact detail

Nozio S.r.l. (hereinafter "**Controller**")
with registered offices in via Zandonai 6/6, 30174, Mestre (VE)
Contact info: info@nozio.com

Purpose of processing, Legal Basis, Personal Data and Retention Period

The Controller processes Personal Data for the following purposes, as specified here in below. The table also shows the legal basis which justifies the processing and the period of data retention:

Purpose	Personal data	Legal basis	Data retention
Contact and support (including through the use of instant messaging services)	✓ Anagraphic information (Name, surname) ✓ Contact details (email, phone number, city)	Performance of a contract or pre contractual measures [Art. 6, 1, lett. b)]	For the time necessary for the response.
Registration on the Website and account management	✓ Anagraphic information (Name, surname) ✓ Contact details (email, phone number, address)	Performance of a contract [Art. 6, 1, lett. b)]	Until account deletion.

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Send newsletters.	✓ Anagraphic information (Name, surname) ✓ Contact details (email)	Consent [Art. 6, 1, lett. a) GDPR]	Until the withdrawal of consent and no longer than 24 months from the date of the last contact.
Send communication for marketing purposes.	✓ Anagraphic information (Name, surname) ✓ Contact details (email)	Consent [Art. 6, 1, lett. a) GDPR]	Until the withdrawal of consent and no longer than 24 months from the date of the last contact.
Profiling to analyze your purchasing habits in order to address commercial proposals.	✓ Anagraphic information (Name, surname) ✓ Contact details (email)	Consent [Art. 6, 1, lett. a) GDPR]	Until the withdrawal of consent and no longer than 12 months from the date of the last contact.
Sending commercial communications by email concerning products and services similar to those purchased (so-called soft spam).	✓ Anagraphic information (Name, surname) ✓ Contact details (email)	Legitimate Interest consisting in offering the user services of likely interest [Art. 6, 1(f) GDPR]	For as long as is strictly necessary to achieve the legitimate interest and until to the eventual opposition.
Recruit and select applicants.	✓ Anagraphic information (Name, surname) ✓ Contact details (email, phone number, address) ✓ Professional information (CV)	Performance of a contract [Art. 6, 1, lett. b)]	2 years.
Allow the Controller to accomplish all formalities required by law.	✓ Anagraphic information (Name, surname)	Legal obligation [Art. 6, 1, lett. c) GDPR]	Until the expiry of the data retention period, as provided by the applicable law.

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	✓ Contact details (email, phone number, address)		
Improve the Website by analyzing how Users navigate and/or use the Website.	✓ IP address	Legitimate interest [Art. 6, 1, lett. f) GDPR]	Not applicable (aggregate or anonymous data)
Detecting or preventing fraudulent activity and exercising the Controller's rights in Court	✓ Anagraphic information (Name, surname) ✓ Contact details (email, phone number, address)	Legitimate interest [Art. 6, 1, lett. f) GDPR]	10 years

In case the User prefers not to communicate mandatory and/or necessary data for the fulfillment of certain purposes, the Controller reserves the right to not provide the service through its Website.

Users can ask for an explanation of the legal basis of each treatment at any time.

Processing modalities

The processing of Personal Data will take place through automated and/or manual tools in order to ensure proper security measures to prevent access, disclosure, loss, incorrect, illegal or unauthorized use of data.

Data Sharing

Your Personal Data may be shared with the following subjects, on a need-to-know basis and in accordance with Applicable Privacy Laws:

i. Internet service providers and platforms used by the Controller as organisation tools, channels of communication and/or promotion (e.g., sendinblue for the chat service whose privacy policy is available at the following link);
ii. third-party service providers who perform services for us or on our behalf and require access to such information to do that job;
iii. public subjects to whom such data must be communicated mandatorily by law or orders of the Authority.

All of the relations with the subjects listed above are - and will be - formalized with a contract pursuant to Art. 28 GDPR (Data Protection Agreement or “DPA”).

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Personal data will be processed by internal staff specifically authorized under Article 29 of the GDPR. The names of all authorized personnel are available under request to the Data Controller, at info@nozio.com.

Tracking pixels

Tracking pixels are minimal-sized images, usually not visible, that are automatically loaded onto the user's device when the message is opened. Through tracking pixels, the Data Controller can detect that the email has been opened and any subsequent openings, the date and time of access, the IP address, technical information about the email client and device used, as well as the technical identifiers associated with the message and the recipient.

The Data Controller uses tracking pixels for the following purposes:

- for security purposes relating to the user authentication process, its completion or its renewal and, in the case of institutional, contractual or service messages, to verify the correct delivery and display of the messages. Such detection is necessary to enable the sending and proper receipt of the communication and does not require consent, pursuant to Article 122, paragraph 1, second sentence, of Legislative Decree No. 196/2003; without it, the Data Controller would be unable to pursue the purposes set out in this point;
- in Marketing communications only, to measure and improve campaign performance based on observed behaviour: for example, by changing the subject line of messages in the event of a low open rate or by improving their relevance, readability and appeal, as well as by adjusting the frequency of sending or stopping it based on the interest shown by the recipient. In such cases, the detection is subject to the data subject's consent, which is included in the consent given for Marketing purposes. Withdrawing consent for this purpose does not affect the receipt of Marketing communications, which will continue to be sent without any tracking relating to the data subject, and does not entail any limitation of the services offered by the Data Controller.

The data collected through tracking pixels are retained, depending on the relevant scope of use, for the periods indicated in the preceding paragraph "Retention Period".
Data subjects who are registered on the Website may also withdraw any consent given by accessing their reserved area on the Website. In addition, with regard to the Marketing purpose, data subjects may use the link included in every communication received either to withdraw consent, thereby stopping the receipt of all future marketing messages, or to partially withdraw consent only for tracking via tracking pixels, while continuing to receive such communications.

Data processing locations

Personal data are processed at the headquarters of the Controller, as well as in the servers that host the Websites. The Data Controller ensures that when using cloud providers established outside the EEA, the processing of personal data by these recipients is carried out in accordance with applicable law. Transfers shall be carried out by means of appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission or other safeguards provided for in the GDPR.

Data Subjects' rights

The User may exercise all the rights provided for by Articles 15-21 of EU Reg. no. 679/2016, at any time and without unjustified limitations, by contacting the Data Controller at info@nozio.com. Requests shall be filed free of charge and processed by the Controller within 30 days.

Specifically, the User can:

- Obtain from the controller confirmation as to whether or not personal data are being processed (Art.15);
- Obtain from the controller the rectification of inaccurate personal data (Art. 16);
- Obtain from the controller the erasure of personal data (Art. 17);
- Obtain from the controller restriction of processing (Art. 18);
- Have the right to receive the personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (Art. 20);
- Have the right to object (Art. 21);

Complaints

In any case, Users are always entitled to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), under Art. 77 of the Regulation, if they believe that the Data Controller's processing of their Personal Data is in violation of the applicable law.

Amendments

The Controller reserves the right to amend and update the Privacy Policy as a result of any further new or revised provisions of any national and EU laws and regulations on personal data protection.

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