

PRIVACY POLICY

related to the www.teyuto.com and www.teyuto.tv web site

Dear **User**,

you have undoubtedly heard of European Regulation No. 679/2016 (better known as "GDPR") on the protection of personal data and the protection of individuals.

Here, precisely in compliance with this regulation and with the national legislation in force, below we provide you with the information you need to understand how we process the data you provide through the use of our online environments www.teyuto.com and www.teyuto.tv owned by Teyuto S.r.l.

Please read this page as if you were asking us the questions in the following paragraphs and we were providing you with the answers: if you have any further questions, please do not hesitate to contact us, we are here for you.

You are the subject to be protected and we want to show you our transparency in doing so.

Let us begin!

Who is the Data Controller?

Teyuto S.r.l. – VAT and F.C.: 06781570483 – with registered office in via Ippolito Pindemonte n. 63, Firenze (FI), 50124.
e-mail: support@teyuto.com

Teyuto S.r.l. (hereinafter "**Teyuto**" and/or "**Data Controller**") is the data controller of the personal data of the Users (hereinafter also "**Data Subject**") who access, navigate and interact within the online environments owned by it, and specifically www.teyuto.com and www.teyuto.tv (hereinafter jointly referred to as the "**Site**"), including sub-domains.

How can I contact the DPO?

e-mail: dpo@teyuto.com

Through the Site, **Teyuto** provides a set of **Services**, including the possibility of creating an OTT (Over The Top) environment that enables the registration of a dedicated digital channel, and the management, organization and personalization of video content. In addition to this, **Teyuto** also allows the use of an integrated machine learning service to advise Users on content in line with their interests and preferences.

Please read our Terms and Conditions for further details.

What Data is processed through the Site?

To Access and navigate within the Site:

- IP address and information about the device and browser used by the Data Subject;
- Cookies and pixels (in accordance with our Cookie Policy).

Contact us and live chat:

- Name of the Data Subject;
- Referring company, email and company telephone number (the latter optional);

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	• For how many Users the request is made (choice from proposed and optional drop-down menu); • Information of the Data Subjects based on their request (from free text form). Access and use platform www.teyuto.tv - End User: • First and last name of the Data Subject; • Payment data; • E-mail address and nickname; • Preferred language and currency; • Information of the Data Subject through use of the live chat service (optional); • Statistical data relating to the use of Teyuto's Services; • Particular data (if any and only if requested from the User by the Super User, who guarantees to collect and process them in accordance with the provisions of art. 9 GDPR. For further information on the protection of such data processing, it is advisable to read the privacy policy provided by the Super User); • Custom Fields (optional. Within these fields, if the End User is within a dedicated channel created by a Super User, the latter may ask for and collect additional information about the Data Subject that is beyond the control of Teyuto S.r.l. For further information on the protection of such data processing, we recommend that you read the privacy policy provided by the relevant Super User). Access and use platform www.teyuto.tv - Super User: • First and last name of contact person; • Company name, company size and number of Users; • Company e-mail address and telephone number; • Preferred language and currency; • Payment and billing information. Use APIs: • IP address of the Data Subject; • Geographical location.
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Although Teyuto does not need to process any data in addition to those set out above, any further information that the Data Subject provides through the use of the Site and the forms present on it will be processed in accordance with our Privacy Policy, our Data Processing Agreement, our Terms and Conditions published online and in full compliance with the provisions of the relevant legislation (hereinafter, personal data and any special data - the latter collected and processed by the Super User - will be jointly referred to and defined as "Data").

For what purposes is the data processed?	What is the legal basis related to the Data processing?	What is the Data retention?
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A. Allowing access and proper functioning of the Site	Legitimate interest of the Data Controller in the provision of its Services through the Site and to allow proper access and use thereof by Users	IP address and information about the browser and device used by the user will be retained for the duration of the session. Please also see our Cookie Policy for the Site, with more information about the cookies used and their retention time.
B. Answering to requests for Services	Legitimate interest of the data controller in providing support for possible user requests	Data will be kept for the duration strictly necessary to execute the User's request
C. Establishing the contractual relationship relating to the Services and fulfilling contractual obligations with Users (contractual purposes)	Establishment, management and contractual fulfilment for the provision of the Services offered and requested by Users. The conferment of the Data is necessary and compulsory for the correct supply of the Services offered and requested by the Users. Failure to provide the Data will result in the impossibility for Teyuto to provide what requested by the Users. Any special data will be processed on the basis of the consent expressed by the User and collected by the Super User who made the request to the User	The Data shall be kept for a period equal to the duration of the contract (including any renewals) and for the following 10 years with particular regard to tax, payment and invoicing data (unless otherwise provided for in accordance with tax and civil law). Any particular data shall be retained until the end of the purpose pursued by the Super User that collected it and, in any case, not beyond the contractual duration of the relationship established with the latter. At the end of the relationship, the user shall have the right to request the cancellation, anonymization and/or return of his/her Data.
D. Fulfilling the administrative and accounting obligations provided for by the legislation (e.g. on anti-money laundering, accounting management and invoicing)	Legitimate interest of the Data Controller in fulfilling the legal obligations	The Data will be kept for the duration strictly necessary for Teyuto's proper fulfilment of its legal obligations
E. For the promotion of the Services through traditional and remote communication tools	Consent. This is optional and withdrawable at any time	For a maximum period of 24 months from the consent of the Data Subject and in

(marketing purposes, e.g.
by Newsletter)

accordance with our Cookie
Policy

In order to constantly monitor the correct functioning of the Site and to offer periodical improvements to its Users who use its Services, Teyuto also pursues statistical purposes, which, however, only process data in an anonymous and aggregate manner.

The Data are processed with manual and/or computerized tools, also by means of automated tools, suitable to guarantee the confidentiality, integrity and privacy of the Data themselves in compliance with and in accordance with the technical-organizational and security measures provided for by the regulations in force.

The information storage of the Data and the Content Delivery Network are performed by means of cloud computing tools on servers located within the EU and/or in non-EU countries (previously and adequately qualified by Teyuto): for further information on the security standards, compliance and compliance with the requirements required by the relevant EU and national regulations in force and adopted by the chosen external providers, please refer to the dedicated privacy policies published online:

- Google LLC [privacy policy](#);
- OVH Cloud [privacy policy](#);
- Microsoft Azure [privacy policy](#);
- G-Core Labs [privacy policy](#).

After the aforementioned retention periods have expired, the Data will be destroyed, deleted or anonymized, subject to technical deletion and backup procedures.

To whom is the Data transferred ?

- Services Providers of the data controller's activities, including:
 - IP-API.com ([privacy policy](#), for the connection and user content services);
 - Stripe Inc. ([privacy policy](#), for payment functions);
 - PayPal Inc. ([privacy policy](#), for payment functions);
 - Formaloo ([privacy policy](#), for form creator activities) and Crisp IM SaS ([privacy policy](#), for live chat services).
- Service providers related to assistance, tax and legal advice
- Service providers related to IT or storage and external service providers;
- Public Institutions.

The Data provided through the Site shall be processed only to ensure the correct use of the Services and may be viewed and used by the Teyuto team (employees and collaborators) duly authorized to the processing.

The Data may also be communicated for the Purposes of Legitimate Interest (after having carried out a thorough analysis of the balancing of interests), to suppliers of assistance services, technical, fiscal and legal consultancy, subjects assignees of credits within credit securitization operations or credit assignment for purposes strictly connected and instrumental to the management of the relationship with the assigned Interested Party, as well as to the issuing of securities, subjects assignees of companies or business branches, potential purchasers of Teyuto and companies resulting from possible mergers, demergers or other transformations of Teyuto, also within the scope of activities functional to such operations, and to competent authorities.

The above mentioned subjects may act, as the case may be, as external data processors or autonomous data controllers in compliance with the laws in force. You may request an updated list of the companies to which the Data will be communicated at any time from the Data Controller, through a specific request to be sent using the contact channels indicated in this Privacy Policy.

Is the Data transferred abroad?

The Data will mainly be processed within the national territory and the European Union, but could also be transferred to extra EU Countries.

Any transfer of the Data of the Data Subject to countries located outside the European Union will take place only in compliance with adequate guarantees for the purposes of the transfer itself (and in particular complying with the provisions of art. 45, 46 and 49 of GDPR), e.g. provided that the European Commission has confirmed that the third country has an adequate level of data protection or other data protection guarantees exist, such as binding business rules or signing up to standard EU contractual clauses.

The Data Subject will have the right to obtain from the data controller a copy of the Data held abroad and to obtain information about the place where such data is stored making an express request to be sent using the contacts indicated in this Privacy Policy.

What are my rights?

By contacting the e-mail address of the Data Controller or the DPO indicated in the present Privacy Policy, you can ask Teyuto at any time:

- access to the Data concerning you, the rectification of inaccurate data, the integration of incomplete Data, their deletion (right to be forgotten), the limitation of processing in the cases provided for by art. 18 GDPR
- to receive in a structured format, common use and readable by automatic device the Data concerning you in the cases provided for by art. 20 GDPR; and, if technically feasible, to transmit such data to another data controller without hindrance
- to withdraw the consent given at any time; as well as oppose at any time the processing of data pursuant to art. 21 GDPR, giving evidence of the reasons justifying the opposition
- any other request for clarification regarding the processing of data carried out by the Data Controller

Finally, we would like to remind you that you can always lodge a complaint with the competent Control Authority (Garante per la Protezione dei Dati Personali) pursuant to Article 77 of the GDPR, should you believe that the processing carried out by the Data Controller is contrary to the legislation in force.

The Data Controller may make amendments and/or additions to this Privacy Policy, also as a consequence of changes in the applicable legislation. You may view the text of the Privacy Policy constantly updated on the Site in the Privacy Policy section or make an explicit request by contacting the Data Controller or the DPO directly at the addresses indicated above.

Last updated: 02 october 2023