

Privacy Policy on Data Processing

Dulcop International S.p.A., as Data Controller, provides this document, drafted in accordance with European Regulation 2016/679, to allow users of the website www.dulcop.com to understand our privacy policy and to learn:

- How their personal data is managed when using our website.
- How to give informed consent to the processing of their personal data.

The information and data provided by you or otherwise acquired during the use of the services provided by Dulcop International S.p.A. (hereinafter referred to as "Services") will be processed in compliance with the Regulation and with confidentiality obligations.

The processing will be based on the principles of lawfulness, fairness, transparency, purpose limitation, storage limitation, data minimization, accuracy, integrity, and confidentiality.

Processed Data

Browsing data: IT systems and software procedures used to operate the website may acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified users, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

Data voluntarily provided by the user: Personal data that the user voluntarily provides, such as personal details, contacts, and any other information provided in their request.

Usage data: Data related to the pages visited, actions performed, and functionalities and services used.

Data collected through cookies or similar technologies: The website uses cookies, web beacons, unique identifiers, and other similar technologies to collect personal data regarding pages visited, links clicked, and other actions taken when using our services. These are stored for subsequent access during future visits.

Third-party data provided voluntarily: When using the website services, you may share personal data of third parties. In such cases, you guarantee that you have obtained their prior consent for processing, assuming full responsibility for such communication.

Purposes

Personal Data collected may be used:

1. To provide support and respond to user requests.
2. To perform technical monitoring of the infrastructure for maintenance, troubleshooting, and performance improvement.
3. For statistical purposes using anonymized data only.
4. For internal market research and surveys.
5. To send emails or newsletters and manage mailing lists, including commercial or promotional content.
6. To enable the display and sharing of content from external platforms (e.g., YouTube, Facebook).
7. To comply with legal obligations or requests from authorities.

Personal data may be shared with Google Inc. (<https://policies.google.com/privacy>) and Facebook Inc. (<https://www.facebook.com/privacy>).

Legal Basis and Mandatory or Optional Nature of Processing

Legal basis of personal data processing listed in the paragraph above are:

- Purpose 1: Processing is necessary to fulfill a contract or pre-contractual measures requested by the user (Art. 6(1)(b) GDPR). Providing data is mandatory; failure to provide it will make it impossible to fulfill your requests.
- Purposes 2 and 3: Processing is based on the Data Controller's legitimate interest (Art. 6.1.f of the GDPR), ensuring fundamental rights and freedoms are respected.
- Purposes 4, 5, and 6: Processing is carried out only with your explicit consent, which can be withdrawn at any time (Art. 6.1.a of the GDPR). Providing data is optional and refusal has no consequences.
- Purpose 7: Processing is required to comply with legal obligations (Art. 6.1.c of the GDPR). Providing data is mandatory in this case.

For clarifications on the legal basis of any processing, you can contact assistenza@bubbleworld.com.

Cookies

The cookies used by the website are described in detail in the Cookie Policy available on the website.

Security Measures

Processing is carried out using technical and organizational measures to ensure the security and confidentiality of personal data, in compliance with applicable regulations.

Data Retention Period

Personal data will be stored for as long as necessary to fulfill the purposes for which they were collected. In particular, personal data will be stored for the duration of the contractual relationship and to fulfill related obligations, to comply with legal or regulatory obligations, for defensive purposes of the Controller or third parties.

If processing is based on consent, personal data may be retained until such consent is revoked.

Personal data may be retained longer if required by law or by order of an authority.

All personal data will be deleted or anonymized within 30 days after the retention period expires. After the expiration of this period, the rights of access, cancellation, rectification, and the right to data portability can no longer be exercised.

Automated Decision-Making Processes

Personal data will not be subject to any automated decision-making processes, including profiling, that produce legal effects or significantly affect you.

Personal Data Recipients

Your Personal Data may be shared, for the purposes outlined in the section above, with:

- parties acting as data processors pursuant to Article 28 of the Regulation, such as individuals, companies, or professional firms that provide assistance and consultancy services to the Data Controller;
- parties with whom interaction is necessary for the provision of Services (for example, hosting providers or parties entrusted with performing technical maintenance activities, including maintenance of network equipment and electronic communication networks);
- entities, bodies, or authorities acting as independent data controllers to whom your Personal Data must be communicated by virtue of legal provisions or orders issued by authorities;
- individuals authorized to process Personal Data pursuant to Article 29 of the Regulation, who are required to carry out activities strictly related to the provision of the Services and who are bound by confidentiality agreements or an adequate legal obligation of confidentiality (e.g., employees and collaborators, collectively referred to as "Recipients").

The list of data processors handling data can be requested from the Data Controller.

User Rights

You have the right to access your data at any time, pursuant to Articles 15–22 of the GDPR. In particular, you may request the rectification, erasure, or restriction of the processing of your data in the cases provided for by Article 18 of the GDPR, withdraw your consent, obtain the portability of your data in the cases provided for by Article 20 of the GDPR, and file a complaint with the competent supervisory authority pursuant to Article 77 of the GDPR (Data Protection Authority for personal data).

You may also submit a request to object to the processing of your data pursuant to Article 21 of the GDPR, specifying the reasons justifying your objection. The Data Controller reserves the right to evaluate your request.

To exercise your rights, you may send a request to the contact details of the Data Controller indicated in this document. Requests are free of charge and will be processed by the Data Controller as quickly as possible, in any case within 30 days.

Data Controller

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