

MIA - Privacy Policy (app.miafashion.it)

Data Controller: AISEM SRL

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Support email: support@itsmia.it

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1. Scope

This notice describes how AISEM SRL processes the personal data of users who register for and use the MIA webapp available at app.miafashion.it (the "Platform").

2. Privacy roles (Controller and Processor)

For data relating to registration, account management, support and billing, AISEM SRL acts as Data Controller.

If the user uses the Platform for professional purposes and uploads Input that includes personal data of third parties (e.g. images or other content referable to identifiable individuals), the professional user acts as Controller and AISEM SRL may act as Processor for the "Client Content" (Input and Output), pursuant to the DPA section in the webapp Terms and Conditions.

3. Personal data processed

3.1 Account and registration data

- email, first and last name
- login credentials (password stored in non-readable form, via hashing)
- account preferences and settings (e.g. language, communication preferences)

3.2 Usage data and technical logs

- technical events and logs necessary for operation and security (e.g. timestamp, endpoint, errors)
- IP address and technical device information (e.g. user agent) to the extent necessary for security and abuse prevention

3.3 Uploaded and generated content (Input and Output)

The Platform allows content to be uploaded (Input) and generated/processed (Output). Input and Output may include personal data only if the user enters it. Users are advised not to upload unnecessary personal data and to avoid images of identifiable real persons, unless a full legal basis and suitable releases exist.

3.4 Payment and billing data (if applicable)

- administrative and billing data (e.g. name, address, VAT number)
- subscription status, plan, credits, order and transaction history
- the payment provider (e.g. Stripe) manages card data; AISEM SRL does not store full card data

3.5 Support and communication data

- content of requests sent to support and related replies

- any attachments sent by the user

4. Purposes of processing and legal bases

- Provision of the service, account management and authentication (performance of a contract, GDPR art. 6.1.b).
- Payment management, billing and accounting/tax obligations (legal obligation and contract, GDPR art. 6.1.c and 6.1.b).
- Technical support and customer care (contract and legitimate interest, GDPR art. 6.1.b and 6.1.f).
- Security, fraud and abuse prevention, protection of the Controller's rights (legitimate interest, GDPR art. 6.1.f).
- Sending newsletters and promotional communications, where the user has given consent (consent, GDPR art. 6.1.a).

5. Marketing communications and newsletter

Subscription to newsletters or promotional communications takes place only with optional and specific consent. Consent may be withdrawn at any time by writing to the contacts indicated above.

6. Data recipients and providers

Data may be processed by providers acting as Processors or, in some cases, as independent Controllers. In particular, consistent with the Terms and Conditions, the following may be involved:

- Payments: Stripe Payments Europe, Ltd. (EU) and Stripe, Inc. (USA).
- Service email: Microsoft 365 (EU/USA) and/or Postmark (EU/USA).
- Cloud infrastructure and storage: providers in the EU/EEA (with any ancillary services outside the EU).
- AI services: Google Cloud (Google Ireland Ltd. and, where applicable, Google LLC).
- Essential telemetry or analytics, where configured: Google Ireland Ltd. (e.g. GA4) and related services.

7. Transfers outside the EEA

Where certain providers process data outside the European Economic Area, transfers take place in compliance with the GDPR through appropriate safeguards, such as Standard Contractual Clauses (SCC) and, where applicable, recognised frameworks.

8. Data retention

- Account data: for the duration of the account and, after closure, for the time necessary to comply with legal obligations and protect the Controller.
- Billing data: for the periods required by accounting and tax regulations.
- Security logs: for periods proportionate to security and abuse-prevention purposes.
- Client Content (Input and Output): for the duration of the contract and according to the Platform's settings; any deletion from backups within 30 days, save for legal obligations, in line with the DPA section of the Terms.
- Marketing: until consent is withdrawn or deletion is requested, save for legal obligations.

9. Data subject rights

Users may exercise the rights provided for in GDPR articles 15-22 (access, rectification, erasure, restriction, portability, objection). To exercise these rights, please contact AISEM SRL at the contacts indicated above.

10. Minors

The Platform is not intended for minors.