Client personal data privacy notice

Version 2026-10-20.2

Notice under Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR) and Italian Legislative Decree 196/2003, as amended. It covers enquiries, valuations, viewings, brokerage assignments, sales and leases handled by N.S.A. LIVING and the acknowledgement collected through the QR form.

1. Controller and contact details

The controller is N.S.A. Living S.r.l., Via Cavour 25, 38122 Trento (TN), P.IVA 02856300229, REA TN-254762, email info@nsaliving.com. For questions and rights requests, email info@nsaliving.com or write to the address above, marking your request “Privacy”. This is the contact point for data protection matters.

2. People, data and sources

This notice concerns owners, buyers, sellers, landlords, tenants, people requesting viewings or valuations, guarantors, delegates and representatives. We collect only data relevant to the specific activity.

- Identity and contact details: name, address, email and phone; tax code, identity document, authority to represent others and beneficial ownership when needed for the transaction or required by law.
- Property and transaction information: location, characteristics, plans, ownership deeds, cadastral and land-register extracts, planning and energy documents, offers, assignments, contracts, appointments and correspondence.
- Relevant financial and payment information: price, rent, commission, payment method, guarantees and evidence of financial capacity where needed for the specific transaction. This form does not request these documents.
- Online acknowledgement: name, email, optional phone, server date and time, language, receipt identifier, acknowledgement wording, notice version and SHA-256 fingerprint. The IP address is used temporarily to limit abuse; the hosting provider may also generate technical logs. IP and device identifiers are not included in the receipt.
- Sources: you directly or, where lawful, counterparties and delegates, instructed professionals, agencies involved in the specific transaction, public registers, the cadastre, land register and public offices. We can identify the available source on request. For indirectly collected data, we provide the notice within the time limits of Article 14: at the latest within one month, or at the first communication to you or disclosure to another recipient if earlier, subject to statutory exceptions.

3. Purposes and legal bases

- Replying to enquiries, valuations and viewings, handling assignments, introducing the parties, negotiations, offers and contracts: performance of a contract or steps you request before a contract (Article 6(1)(b) GDPR).
- Tax, accounting and registration requirements and applicable anti-money-laundering due diligence, retention and reporting under Legislative Decree 231/2007: legal obligation (Article 6(1)(c) GDPR).
- Necessary processing of representatives’, delegates’ and counterparties’ data when they are not parties to our contract; documenting provision of the notice, sending receipts, preventing abuse and protecting legal rights: the controller’s legitimate interests in managing and securing the relationship and defending its rights (Article 6(1)(f) GDPR), subject to balancing against your rights.

4. Required data and meaning of the checkbox

Data needed for the specific request or a legal requirement must be available for the relevant activity. Without them, we may be unable to proceed or may have to refrain under anti-money-laundering rules. Unnecessary data are not mandatory.

The QR form requires your name and email to associate and send the receipt; phone is optional. The checkbox records that you have read the notice. It is not general consent to processing or authorisation for additional purposes. Processing needed for the transaction uses the legal bases above.

You may request a paper copy and acknowledge it at the agency instead of using the online form. Not completing the form does not amount to an objection to every processing activity and cannot prevent processing required by law.

5. Marketing and automated decisions

This form does not collect consent for newsletters, advertising, sharing contacts for third-party marketing or profiling. No checkbox is preselected. Any future promotional activity will require a separate notice and specific, optional consent where legally required; refusal will not affect brokerage services.

Within this scope, we do not make decisions based solely on automated processing with legal or similarly significant effects under Article 22 GDPR. The acknowledgement does not authenticate the person completing the form and does not replace a signature on an assignment or contract.

6. Processing and protection

Data are processed using IT systems, email and, where needed, paper records by authorised people according to their duties. We adopt technical and organisational measures proportionate to risk, including access controls, permission management, HTTPS transmission and protected records.

Do not enter identity documents, health information or unnecessary details in this form. It does not request special categories of data (Article 9) or criminal-offence data (Article 10). Any such processing required for a specific transaction needs the further legal conditions and safeguards that apply.

7. Recipients and publication

- Agency staff and collaborators expressly authorised and subject to confidentiality.
- Only as needed for the specific transaction: counterparties and delegates, notaries, lawyers, tax advisers, surveyors, condominium managers and instructed banks or credit brokers. Professionals may act as independent controllers according to their role; data are not shared indiscriminately with these categories.
- Providers processing data for us, under Article 28 agreements where required: Netlify for hosting, Resend for transactional email, our business email provider and a CRM provider if used for the transaction. Request the updated processor list at info@nsaliving.com.
- Public administrations, courts, supervisory bodies and other recipients required by law, including for anti-money-laundering duties.
- Form data and receipts are not published. Property advertising through the website or portals uses information agreed for marketing the property and does not authorise publication of unnecessary personal contact details or identity documents.

8. Processing and transfers outside the EEA

Hosting, email and email-delivery providers may process or access data outside the European Economic Area, including in the United States. These services may use subprocessors; information about the countries involved and safeguards actually applied is available from the controller on request.

Transfers comply with Articles 44 et seq. GDPR: a valid adequacy decision, including the EU-US framework for participating recipients where applicable, or European Commission standard contractual clauses with a transfer assessment and supplementary measures where necessary. The acknowledgement checkbox is not the legal basis for transfers. Request information or a copy of relevant safeguards at info@nsaliving.com, with confidential information redacted.

9. Retention

- Enquiries without a later assignment or contract: up to 24 months from the last relevant contact, subject to an applicable erasure request or documented need to protect rights.
- Transaction records: for the relationship and afterwards as needed for duties and claims; accounting records for the statutory period, ordinarily 10 years under Article 2220 of the Italian Civil Code, subject to other applicable periods.
- Anti-money-laundering records under Legislative Decree 231/2007: 10 years from termination of the ongoing relationship or professional service, or execution of the transaction, under Article 31.
- Acknowledgement receipt and notice copy: follow the related transaction; without a transaction, up to 24 months. Retention for legal duties or claims is limited to relevant data and periods, generally no longer than 10 years after the case closes, except litigation or another statutory obligation.
- The form’s abuse limiter uses a 10-minute in-memory window rather than a permanent archive. Hosting logs follow the service’s technical retention settings and are used for operation and security only. At the relevant deadline, data are deleted or anonymised, with corresponding backup management.

10. Rights, objection and response

Subject to Articles 15-22 GDPR, you can request access and a copy, rectification, erasure, restriction and portability. Portability concerns data you provided that are processed automatically on the basis of consent or contract.

You may object to processing based on legitimate interests on grounds relating to your particular situation. We will stop unless compelling overriding legitimate grounds or legal claims justify continuation. Erasure may be limited by retention duties and legal claims; statutory restrictions may apply for anti-money-laundering processing.

Email info@nsaliving.com or write to the controller. We may request only information needed to verify identity. We normally respond within one month; any extension of up to two further months under Article 12 will be explained within the first month. Requests are normally free, subject to statutory exceptions.

Any future consent-based processing may be withdrawn at any time without affecting earlier lawful processing. The acknowledgement collected here is not consent to be withdrawn.

11. Complaints and remedies

You may lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it), Piazza Venezia 11, 00187 Rome, or the supervisory authority in the Member State where you habitually live, work or believe a violation occurred, and seek a judicial remedy.

12. Receipt, updates and further purposes

Confirmation triggers two separate emails: one to info@nsaliving.com for archiving the declaration and one to the address supplied by the person completing the form. They include an identifier, server date and time, declaration and a copy of this notice version. They are transactional emails and do not subscribe you to advertising lists. If you do not recognise a receipt, contact us for correction and checks.

The version and fingerprint identify the notice made available when you declared you had read it. Later changes do not alter the copy already sent. Before using data for incompatible further purposes, we will provide the required information and identify a valid legal basis. Website privacy and cookie preferences are described separately on the relevant pages.

I confirm I have read the client personal data privacy notice of N.S.A. Living S.r.l..

SHA-256: 76d848ffdc9644b917ed43205b5c61a69807c1378093fe7404894a497d189ffb