



Privacy Policy and Cookie Policy

Version: 1.0 Effective date: January 2026 Last updated: January 2026

PART I – PRIVACY POLICY

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1. DATA CONTROLLER

The Controller of personal data processing is:

WeMoveOn

- Email: info@wemoveon.eu
- Website: <https://mo-ve.in>

The Controller is committed to protecting users' privacy and processing personal data in compliance with Regulation (EU) 2016/679 (GDPR) and current Italian legislation on the protection of personal data.

2. TYPES OF DATA COLLECTED

2.1 Data voluntarily provided by the user

Category	Data	When it is collected
Registration data	Name, email, password (hash)	Account registration
Contact data	Email	Submitting reports/feedback
User content	Report text, favorites	Use of app features

2.2 Data collected automatically

Category	Data	Purpose
Browsing data	IP address, browser, device, operating system	Technical operation
Geolocation data	GPS coordinates (latitude, longitude)	Route calculation and navigation
Usage data	Pages visited, in-app actions, timestamp	Service improvement
Technical data	Device type, screen resolution, app version	Experience optimization

2.3 Geolocation data

The application requests access to the user's geographic location in order to:

- Calculate routes from the current position;
- Provide turn-by-turn navigation;
- Show points of interest nearby.

Important: the user can deny or revoke geolocation authorization at any time from their device settings. In that case, some app features may not be available.

3. PURPOSES OF PROCESSING

Personal data is processed for the following purposes:

3.1 Purposes necessary for providing the service

Purpose	Description
Service delivery	Route calculation, navigation, display of POIs
Account management	Registration, authentication, password recovery
Favorites management	Saving and retrieving favorite places
Report management	Receiving and handling feedback and bug reports

3.2 Purposes based on legitimate interest

Purpose	Description
Security	Fraud and abuse prevention
Service improvement	Aggregate analysis to optimize the app
Technical support	Resolving technical issues

3.3 Purposes based on consent

Purpose	Description
Promotional communications	Newsletters and updates (only with explicit consent)
Geolocation	Access to location (requires device authorization)

4. LEGAL BASIS FOR PROCESSING

The processing of personal data is based on the following legal bases:

Legal basis	GDPR reference	Application
Performance of a contract	Art. 6(1)(b)	Service delivery, account management
Consent	Art. 6(1)(a)	Geolocation, marketing communications
Legitimate interest	Art. 6(1)(f)	Security, service improvement

Legal basis	GDPR reference	Application
Legal obligation	Art. 6(1)(c)	Tax and legal compliance

5. PROCESSING METHODS

5.1 Security measures

The Controller adopts adequate technical and organizational security measures to protect personal data:

- **Encryption:** HTTPS/TLS connections for data transmission;
- **Password hashing:** passwords are stored using secure hashing algorithms (bcrypt);
- **Restricted access:** only authorized personnel can access the data;
- **Backups:** regular encrypted backups;
- **Updates:** regular updates of security systems.

5.2 Automated processing

Data may be subject to automated processing for:

- Calculating optimal routes;
- Personalizing the user experience;
- Detecting security anomalies.

No profiling is carried out for commercial purposes, nor are there any automated decision-making processes with significant legal effects.

6. PLACE OF PROCESSING

6.1 Servers and hosting

Data is processed at:

- Servers located within the European Union;
- Data centers compliant with ISO 27001 security standards.

6.2 Transfer of data outside the EU

If third-party services with servers outside the EU are used, the transfer takes place in compliance with the safeguards provided by the GDPR:

- Adequacy decisions of the European Commission;
- Standard Contractual Clauses (SCC);
- Binding Corporate Rules (BCR).

7. RETENTION PERIOD

Personal data is retained for the time strictly necessary for the purposes for which it was collected:

Type of data	Retention period
Account data	Until account deletion + 30 days
Browsing data	12 months

Type of data	Retention period
Security logs	24 months
Report data	36 months from closure
Geolocation data	Not permanently stored (session only)
ToS/Privacy consent	10 years (legal obligation)

At the end of the retention period, data is deleted or irreversibly anonymized.

8. RIGHTS OF THE DATA SUBJECT

In accordance with the GDPR, the user has the following rights:

8.1 List of rights

Right	Description	GDPR reference
Access	Obtain confirmation of processing and a copy of the data	Art. 15
Rectification	Correct inaccurate or incomplete data	Art. 16
Erasure	Request deletion of data ("right to be forgotten")	Art. 17
Restriction	Restrict processing in certain cases	Art. 18
Portability	Receive data in a structured format	Art. 20
Objection	Object to processing for legitimate reasons	Art. 21
Withdraw consent	Withdraw consent at any time	Art. 7(3)

8.2 How to exercise your rights

To exercise their rights, the user can:

- Send a request by email to: info@wemoveon.eu;
- Specify in the subject line: "Privacy Request - [Type of right]";
- Attach a copy of an identity document.

The Controller will respond within 30 days of receiving the request.

8.3 Complaint to the Supervisory Authority

The user has the right to lodge a complaint with the Italian Data Protection Authority:

Garante per la Protezione dei Dati Personali

- Website: www.garanteprivacy.it
- Email: garante@gpdp.it
- PEC: protocollo@pec.gpdp.it

9. MINORS

The application is not intended for children under 14 years of age. We do not knowingly collect personal data from children under 14.

If a parent or guardian becomes aware that their child under 14 has provided personal data without consent, please contact us so that the data can be removed.

10. CHANGES TO THE PRIVACY POLICY

The Controller reserves the right to modify this Privacy Policy at any time.

In the event of substantial changes, the user will be informed via:

- In-app notification;
- Email (if registered);
- Informational banner.

The “Last updated” date at the top of the document indicates when the last change was made.

PART II – COOKIE POLICY

COOKIE POLICY TABLE OF CONTENTS

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1. WHAT COOKIES ARE

Cookies are small text files that visited websites send to the user's browser, where they are stored to be sent back to the same websites on the next visit.

1.1 Similar technologies

In addition to cookies, the application may use similar technologies:

Technology	Description
Local Storage	Storage of data in the browser (persistent)
Session Storage	Storage of data for the current session
IndexedDB	Local database for structured data
Service Worker Cache	Cache for offline functionality (PWA)

2. TYPES OF COOKIES USED

2.1 Technical (Necessary) Cookies

These cookies are essential for the application to function and cannot be disabled.

Cookie Name	Purpose	Duration
PHPSESSID	User session management	Session
csrf_token	Protection against CSRF attacks	Session
auth_token	User authentication	30 days
lang	Language preference	1 year
theme	Theme preference (light/dark)	1 year
tos_accepted	Acceptance of Terms of Service	10 years
privacy_accepted	Acceptance of Privacy Policy	10 years
cookie_consent	Cookie consent	1 year

Legal basis: these cookies do not require consent as they are strictly necessary to provide the service requested by the user (Art. 122 Italian Privacy Code).

2.2 Functional Cookies

These cookies improve the user experience by storing preferences.

Cookie Name	Purpose	Duration
map_zoom	Last map zoom level	30 days
map_center	Last map center position	30 days
routing_mode	Preferred routing mode	30 days
poi_filters	Active POI filters	30 days
onboarding_complete	Tutorial completion	Permanent

Legal basis: legitimate interest in improving the user experience.

2.3 Analytics Cookies

These cookies collect aggregate information on app usage.

Cookie Name	Purpose	Duration
_ga	Google Analytics - user identifier	2 years

Cookie Name	Purpose	Duration
_gid	Google Analytics - session identifier	24 hours
_gat	Google Analytics - request throttling	1 minute

Legal basis: user consent. These cookies are installed only after consent has been obtained via the cookie banner.

Note: analytics data is anonymized (IP anonymization enabled) and used exclusively for aggregate statistical purposes.

2.4 Profiling Cookies

The application does NOT use profiling cookies for advertising purposes.

3. THIRD-PARTY COOKIES

The application may use third-party services that install their own cookies:

3.1 Google Analytics

Field	Detail
Provider	Google LLC
Purpose	Aggregate statistical analysis
Privacy Policy	https://policies.google.com/privacy
Opt-out	https://tools.google.com/dlpage/gaoptout

3.2 OpenStreetMap

Field	Detail
Provider	OpenStreetMap Foundation
Purpose	Map display
Privacy Policy	https://wiki.osmfoundation.org/wiki/Privacy_Policy

3.3 CDN Services

Field	Detail
Provider	Cloudflare / jsDelivr
Purpose	Static content delivery
Privacy Policy	See the respective websites

4. MANAGING COOKIES

4.1 Cookie Banner

On first access to the application, a banner is shown that allows the user to:

- **Accept all:** accept all cookies (technical, functional, analytics);
- **Necessary only:** accept only essential technical cookies;
- **Customize:** choose which categories of cookies to accept.

4.2 Changing preferences

The user can change their cookie preferences at any time:

- By accessing the app Settings;
- Privacy and Cookies section;
- Manage cookie preferences button.

4.3 Disabling via browser

The user can also manage cookies through their browser settings:

Browser	Guide
Chrome	chrome://settings/cookies
Firefox	about:preferences#privacy
Safari	Preferences > Privacy
Edge	edge://settings/privacy

Warning: disabling all cookies may prevent some features of the application from working correctly.

4.4 Deleting existing cookies

To delete cookies already stored:

- 1 Go to your browser settings;
- 2 Look for the “Privacy” or “Cookies” section;
- 3 Select “Clear browsing data”;
- 4 Select “Cookies and other site data”;
- 5 Confirm the deletion.

5. UPDATES TO THE COOKIE POLICY

This Cookie Policy may be updated periodically.

The “Last updated” date indicates when the last change was made.

In the event of substantial changes, the user will again be invited to express their preferences via the cookie banner.

SUMMARY OF DATA PROCESSED

Data	Collected	Purpose	Retention
Email	Yes (registration)	Account, communications	Until deletion
Password	Yes (hash)	Authentication	Until deletion
GPS location	Yes (consent)	Navigation	Session only
IP address	Yes	Security, analytics	12 months
App preferences	Yes	Personalization	1 year
Reports	Yes	Support	36 months
ToS consent log	Yes	Legal evidence	10 years

PRIVACY CONTACTS

For any question regarding privacy or cookies:

WeMoveOn

- Email: info@wemoveon.eu
- Subject: "Privacy Request" or "Cookie Information"

Movein - Accessible Navigation in Venice
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