**Privacy Policy Michele Dellaquila** 

This application collects some Personal Data from its Users.

Data Controller

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Types of Data collected

Among the Personal Data collected by this Application, independently or through third

parties, there are: Tracking Tools; Usage data.

Complete details on each type of data collected are provided in the dedicated sections of this

privacy policy or through specific information texts displayed before the data is collected.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected

automatically when using this Application.

Unless otherwise specified, all Data requested by this Application are mandatory. If the User

refuses to communicate them, it may be impossible for this Application to provide the Service.

In cases where this Application indicates some Data as optional, Users are free to refrain from

communicating such Data, without this having any consequence on the availability of the

Service or on its operation.

Users who have doubts about which Data are mandatory are encouraged to contact the

Owner. Any use of Cookies - or other tracking tools - by this Application or by the owners of

third-party services used by this Application, unless otherwise specified, has the purpose of

providing the Service requested by the User, in addition to further purposes described in this

document and in the Cookie Policy, if available.

The User assumes responsibility for the Personal Data of third parties obtained, published or shared through this Application and guarantees that he has the right to communicate or disseminate them, freeing the Owner from any liability towards third parties.

# Method and place of processing of the collected Data Methods of treatment

The Data Controller adopts the appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data.

The processing is carried out using IT and/or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other subjects involved in the organization of this Application (administrative, commercial, marketing, legal, system administrators) or external subjects (such as third party technical service providers, postal couriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, as Data Processors by the Data Controller. The updated list of Managers can always be requested from the Data Controller.

# Legal basis of the treatment

The Data Controller processes Personal Data relating to the User in the event that one of the following conditions exists:

- The User has given consent for one or more specific purposes; Note: in some jurisdictions the Owner may be authorized to process Personal Data without the User's consent or another of the legal bases specified below, as long as the User does not object ("opt-out") a treatment narrative. However, this is not applicable if the processing of Personal Data is governed by European legislation on the protection of Personal Data.
- The treatment is necessary for the execution of a contract with the User and/or for the execution of pre-contractual measures;
- The processing is necessary to fulfill a legal obligation to which the Data Controller is subject;
- the processing is necessary for the execution of a task in the public interest or for the exercise of public powers vested in the Data Controller;
- The processing is necessary for the pursuit of the interests of the Data Controller or of third parties.

However, it is always possible to ask the Data Controller to clarify the concrete legal basis of each treatment and in particular to specify whether the treatment is based on the law, provided for by a contract or necessary to conclude a contract.

#### **Place**

The Data is processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For more information, contact the Owner.

The User's Personal Data may be received in a country other than the one in which the User is located. To obtain further information on the place of processing, the User can refer to the section relating to the details on the processing of Personal Data.

The User has the right to obtain information regarding the legal basis for the transfer of Data outside the European Union or to an international organization of public international law or constituted by two or more countries, such as for example the UN, as well as regarding the security measures adopted by the Data Controller to protect the Data.

The User can verify whether one of the transfers described above takes place by examining the section of this document relating to the details on the processing of Personal Data or by requesting information from the Data Controller by contacting him at the contact details indicated at the beginning.

## Storage period

The Data are processed and stored for the time required by the purposes for which they were collected.

#### Therefore:

- Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of this contract is completed.
- Personal Data collected for purposes attributable to the legitimate interest of the
  Data Controller will be kept until such interest is satisfied. The User can obtain
  further information regarding the legitimate interest pursued by the Data Controller
  in the relevant sections of this document or by contacting the Data Controller.

When the treatment is based on the User's consent, the Owner can keep the Personal Data for longer until said consent is revoked. Furthermore, the Data Controller may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the Personal Data will be deleted. Therefore, upon expiry of this term, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

## Purpose of the processing of the collected data

The User's Data is collected to allow the Owner to provide the Service, fulfill legal obligations, respond to requests or executive actions, protect its rights and interests (or those of Users or third parties), identify any painful activity or fraudulent, as well as for the following purposes: Statistics.

To obtain detailed information on the purposes of the processing and on the Personal Data processed for each purpose, the User can refer to the "Details on the processing of Personal Data" section.

## **Details on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

#### **Statistics**

The services contained in this section allow the Data Controller to monitor and analyze traffic data and are used to keep track of User behaviour.

## **Google Analytics (Google LLC)**

Google Analytics is a web analytics service provided by Google LLC ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Application, compiling reports and sharing them with other services developed by Google.

Google may use the Personal Data to contextualize and personalize the ads of its advertising network.

Personal Data processed: Usage data; Tracking Tools. Place of processing: United States

Privacy Policy - Opt Out.

# **User rights**

Users can exercise certain rights with reference to the Data processed by the Owner. In particular, within the limits established by law, the User has the right to:

- **revoke consent at any time.** The User can revoke the previously expressed consent to the processing of his Personal Data.
- **oppose the processing of their Data.** The User can object to the processing of their Data when it occurs on a legal basis other than consent. Further details on the right to object are set out in the section below.
- **access their Data.** The User has the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the Data processed.
- **check and ask for rectification.** The User can verify the correctness of his Data and request its updating or correction.
- **obtain the limitation of the treatment.** The User can request the limitation of the processing of their Data. In this case, the Owner will not process the Data for any other purpose than their conservation.
- **obtain the cancellation or removal of their Personal Data.** The User can request the cancellation of his Data by the Owner.
- receive their data or have them transferred to another owner. The User has the right to receive his Data in a structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain the transfer without obstacles to another holder.
- **appeal.** The User can lodge a complaint with the competent personal data protection supervisory authority or take legal action.

# **Details on the right to object**

When Personal Data is processed in the public interest, in the exercise of public powers vested in the Data Controller or for an interest held by the Data Controller, Users have the right to object to the processing for reasons connected with their particular situation.

Users are informed that, if their Data is processed for direct marketing purposes, they can object to the processing at any time, free of charge and without providing any cover. If Users oppose the processing for direct marketing purposes, the Personal Data are no longer processed for these purposes. To find out if the Data Controller processes Data for direct marketing purposes to Users, they can refer to the respective sections of this document.

## How to exercise your rights

To exercise their rights, Users can send a request to the contact details of the Data Controller indicated in this document. The request can be filed free of charge and the Owner will respond as soon as possible, in any case within a month, providing the User with all the information required by law. Any corrections, cancellations or limitations to the processing will be communicated by the Data Controller to each of the recipients, if any, to whom the Personal Data have been transmitted, unless this proves impossible or involves a disproportionate effort. The Owner communicates these recipients to the User if he requests it.

## Learn more about treatment

#### **Defense in court**

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its eventual establishment for the defense against abuse in the use of this Application or related Services by the User.

The User declares to be aware that the Owner may be obliged to disclose the Data by order of the public authorities.

## **Definitions and legal references**

#### Dati Personali (o Dati)

Personal data is any information which, directly or indirectly, also in connection with any other information, including a personal identification number, makes a natural person identified or identifiable.

#### **Usage Data**

This is information collected automatically through this Application (also from third parties integrated into this Application), including: IP addresses or domain names of the computers used by the User who connects with this Application, addresses in URI notation (Uniform Resource identifier), the time of the request, the method used in forwarding the request to the server, the size of the

file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details relating to the itinerary followed within the Application, with

particular reference to the sequence of pages consulted, the parameters relating to the operating system and the User's IT environment.

#### **Data Processor (or Manager)**

The natural person, legal person, public administration and any other body that processes personal data on behalf of the Data Controller, according to what is set out in this privacy policy.

#### **Data Controller (or Owner)**

The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of processing personal data and the tools adopted, including the security measures relating to the functioning and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application.

#### Cookie

Cookies are Tracking Tools that consist of small portions of data stored in the User's browser.

## **Tracking Tool**

Tracker means any technology - e.g. Cookies, unique identifiers, web beacons, embedded scripts, etags and fingerprinting - which allows tracking Users, for example by collecting or saving information on the User's device.

## Legal references

This privacy statement has been prepared on the basis of multiple legislative systems, including articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy statement applies exclusively to this Application. Last modified: May 19, 2023