

Privacy Policy

Terms and conditions are subject to change without notice.

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Owner and Data Controller

Owner contact email: contact form

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies, Usage Data, email address, first name, last name, country, company name, various types of Data, geographic position, date of birth, phone number, address, username, province, ZIP/Postal code, city, billing address, shipping address, house number and data relating to the point of sale.

Complete details on each type of Personal Data collected are provided in the dedicated sections of the service providers' privacy policy

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Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this or service providers Application.

Unless specified otherwise, all Data requested by any Application is mandatory and failure to provide this Data may make it impossible for the service providers Application to provide its services. In cases where any Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory are welcome to contact the service provider.

Any use of Cookies – or of other tracking tools – by an Application or by the owners of third-party services used by an Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through an Application and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

All Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Service/Owner.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislation's the Owner may be allowed to process Personal Data until the User objects to such processing ("opt-out"), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to United States data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;

- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the United States or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

 Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed. Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority. Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Analytics, Access to third-party accounts, Commercial affiliation, Handling payments, Contacting the User, Content commenting, Displaying content from external platforms, Heat mapping and session recording, Hosting and backend infrastructure, Interaction with external social networks and platforms, Interaction with online survey platforms, Location-based interactions, Platform services and hosting, Registration and authentication, Remarketing and behavioral targeting, SPAM protection and Tag Management.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

Facebook permissions asked by this Application

This Application may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows this Application to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the <u>Facebook</u> <u>permissions documentation</u> and to the <u>Facebook privacy policy</u>.

The permissions asked are the following:

Basic information

By default, this includes certain User's Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available.

About Me

Provides access to the 'About Me' section of the profile.

Detailed information on the processing of Personal Data

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

Access to third-party accounts

This type of service allows this Application to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.

Facebook account access (this Application)

This service allows this Application to connect with the User's account on the Facebook social network, provided by Facebook, Inc.

Permissions asked: About Me.

Place of processing: US – <u>Privacy Policy</u>.

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this

Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network. Personal Data collected: Cookies and Usage Data. Place of processing: US – Privacy Policy – Opt Out.

WordPress Stats (Automattic Inc.)

WordPress Stats is an analytics service provided by Automattic Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

Facebook Ads conversion tracking (Facebook, Inc.)

Facebook Ads conversion tracking is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on this Application. Personal Data collected: Cookies and Usage Data. Place of processing: US – <u>Privacy Policy</u>.

Facebook Analytics for Apps (Facebook, Inc.)

Facebook Analytics for Apps is an analytics service provided by Facebook, Inc. Personal Data collected: Usage Data and various types of Data as specified in the privacy policy of the service. Place of processing: US – <u>Privacy Policy</u>.

Commercial affiliation

This type of service allows this Application to display advertisements for thirdparty products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the thirdparty services listed below, and are shared with this Application. For details of which data are collected, please refer to the privacy policy of each service provider.

Contacting the User

Mailing list or newsletter (this Application)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase. Personal Data collected: company name, country, email address, first name and last name.

Contact form (this Application)

By filling in a contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header. Personal Data collected: country, email address, first name and last name.

Content commenting

Content commenting services allow Users to make and publish their comments on the contents of this Application. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

Disqus (Disqus)

Disqus is a content commenting service provided by Big Heads Labs Inc. Personal Data collected: Cookies, Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: US – <u>Privacy Policy</u> – <u>Opt out</u>.

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application. The interaction and information obtained through this Application are always subject to the User's privacy settings for each social network. This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

• Personal Data collected: Cookies and Usage Data.

Place of processing: See the PayPal privacy policy – Privacy Policy.

Facebook Like button and social widgets (Facebook, Inc.)

- The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.
- Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

LinkedIn button and social widgets (LinkedIn Corporation)

- The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.
- Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

Twitter Tweet button and social widgets (Twitter, Inc.)

- The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.
- Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

Interaction with online survey platforms

- This type of service allows Users to interact with third-party online survey platforms directly from the pages of this Application.
- If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Location-based interactions

Non-continuous geolocation (this Application)

This Application may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by this Application. The geographic location of the User is determined in a manner that isn't continuous, either at the specific request of the User or when the User doesn't point out its current location in the appropriate field and allows the application to detect the position automatically. Personal Data collected: geographic position.

Platform services and hosting

These services have the purpose of hosting and running key components of this Application, therefore allowing the provision of this Application from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

WordPress.com (Automattic Inc.)

WordPress.com is a platform provided by Automattic Inc. that allows the Owner to build, run and host this Application.Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: USA – Privacy Policy.

Registration and authentication

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Facebook Authentication (Facebook, Inc.)

Facebook Authentication is a registration and authentication service provided by Facebook, Inc. and is connected to the Facebook social network. Personal Data collected: various types of Data as specified in the privacy policy of the service. Place of processing: US – <u>Privacy Policy</u>.

Direct registration (this Application)

- The User registers by filling out the registration form and providing the Personal Data directly to this Application.
- Personal Data collected: address, billing address, city, country, data relating to the point of sale, date of birth, email address, first name, house number, last name, phone number, province, shipping address, username and ZIP/Postal code.

Remarketing and behavioral targeting

 This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User.

- This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity.
- In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the <u>Network</u> <u>Advertising Initiative opt-out page</u>.

Facebook Custom Audience (Facebook, Inc.)

- Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Application with the Facebook advertising network.
- Personal Data collected: Cookies and email address.
- Place of processing: US <u>Privacy Policy</u> <u>Opt Out</u>.

SPAM protection

This type of service analyzes the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that is recognized as SPAM.

Google reCAPTCHA (Google Inc.)

Google reCAPTCHA is a SPAM protection service provided by Google Inc.
The use of reCAPTCHA is subject to the Google <u>privacy policy</u> and <u>terms of use</u>.
Personal Data collected: Cookies and Usage Data.

Place of processing: US – <u>Privacy Policy</u>.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralized manner. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

Further information about Personal Data

The Service is not directed to children under the age of 13

Users declare themselves to be adult according to their applicable legislation. Minors may use this Application only with the assistance of a parent or guardian. Under no circumstance persons under the age of 13 may use this Application.

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Application depends on the payment system used.

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner. In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.

- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the
 right to receive their Data in a structured, commonly used and machine readable
 format and, if technically feasible, to have it transmitted to another controller
 without any hindrance. This provision is applicable provided that the Data is
 processed by automated means and that the processing is based on the User's
 consent, on a contract which the User is part of or on pre-contractual obligations
 thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

- Where Personal Data is processed for a public interest, in the exercise of an
 official authority vested in the Owner or for the purposes of the legitimate
 interests pursued by the Owner, Users may object to such processing by
 providing a ground related to their particular situation to justify the
 objection.
- Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How "Do Not Track" requests are handled

This Application does not support "Do Not Track" requests.
 To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

Changes to this privacy policy

- The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Application and/or as far as technically and legally feasible sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.
- Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Personal Data (or Data)

 Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

• Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookies

Small piece of data may be stored in the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to this Application, if not stated otherwise within this document.

<u>1and1</u> hosts this content and only collects the Personal Data strictly necessary for it to be provided.

Displaying content from external platforms

- This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.
- This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Instagram widget (Instagram, Inc.)

- Instagram is an image visualization service provided by Instagram, Inc. that allows this Application to incorporate content of this kind on its pages.
- Personal Data collected: Cookies and Usage Data.

Place of processing: US – <u>Privacy Policy</u>.

Google Fonts (Google Inc.)

- Google Fonts is a typeface visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.
- Personal Data collected: Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: US – <u>Privacy Policy</u>. Privacy Shield participant.

Vimeo video (Vimeo, LLC)

Vimeo is a video content visualization service provided by Vimeo, LLC that allows this Application to incorporate content of this kind on its pages. Personal Data collected: Cookies and Usage Data.

Place of processing: US – <u>Privacy Policy</u>.

YouTube video widget (Google Inc.)

YouTube is a video content visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages. Personal Data collected: Cookies and Usage Data.

Place of processing: US – <u>Privacy Policy</u>.

Heat mapping and session recording

Heat Mapping services are used to display the areas of a page where Users most frequently move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior. Some of our affiliates and service services may record sessions and make them available for later visual playback. Personal Data collected: Cookies, Usage Data and various types of Data as specified in their privacy policy of the service.

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable an Application to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Application. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Amazon Web Services (AWS) (Amazon)

Amazon Web Services is a hosting and backend service provided by Amazon.com Inc. Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: See the Amazon privacy policy – Privacy Policy



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