

Privacy Policy of guess.eu

This Application collects some Personal Data from its Users.

Owner and Data Controller

GUESS Europe Sagl - Strada Regina 44 6934 Bioggio - Svizzera

Owner contact email: dpo.privacy@guess.eu

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Tracker; Usage Data; geographic position; various types of Data; email address; device information; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Data communicated while using the service; Universally unique identifier (UUID); number of Users; session statistics.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application. Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this 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 Owner.

Any use of Cookies – or of other tracking tools — by this Application or by the owners of third-party services used by this 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.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

Mode and place of processing the Data

Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organisational 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 Owner. The updated list of these parties may be requested from the Owner at any time.

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.

Retention time

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

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent

activity, as well as the following: Analytics, Advertising, Traffic optimisation and distribution, Hosting and backend infrastructure, Displaying content from external platforms, Tag Management, Handling payments, Remarketing and behavioural targeting, Registration and authentication, Commercial affiliation, SPAM protection, User database management, Managing support and contact requests, Social features, Heat mapping and session recording and Platform services and hosting.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

Detailed information on the processing of Personal Data

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

Advertising

This type of service allows User Data to be utilised for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Application, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioural retargeting technique, i.e. displaying ads tailored to the User’s interests and behaviour, including those detected outside this Application. For more information, please check the privacy policies of the relevant services. Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section “How to opt-out of interest-based advertising” in this document.

Yandex (YANDEX, LLC)

Yandex is an advertising service provided by YANDEX, LLC.

Personal Data processed: Tracker; Usage Data.

Place of processing: Russian Federation – [Privacy Policy](#).

Fanplayr (Fanplayr, Inc.)

Fanplayr is an advertising and behavioural targeting service provided by Fanplayr, Inc, which provides analytics and allows this Application to display popups with the purpose to communicate with the User in a targeted fashion or to collect email addresses. Fanplayr also allows this Application to send push notifications to the User, personalised on the basis of their behaviour on this Application, for the purpose of direct marketing.

Personal Data processed: geographic position; Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Salesforce (Salesforce.com, inc.)

Salesforce is an advertising service provided by Salesforce.com, inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Adform (Adform A/S)

Adform is an advertising service provided by Adform A/S.

Personal Data processed: Tracker; Usage Data.

Place of processing: Denmark – [Privacy Policy](#) – [Opt Out](#).

Google AdSense (Google LLC)

Google AdSense is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. This service uses the “DoubleClick” Cookie, which tracks use of this Application and User behaviour concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: [Google Ad Settings](#).

In order to understand Google's use of data, consult [Google's partner policy](#).

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Microsoft Advertising (Microsoft Corporation)

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Facebook Lookalike Audience (Meta Platforms, Inc.)

Facebook Lookalike Audience is an advertising and behavioural targeting service provided by Meta Platforms, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behaviour to Users who are already in a Custom Audience list on the base of their past use of this Application or engagement with relevant content across the Facebook apps and services. On the base of these Data, personalised ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of Trackers for ads personalisation by visiting this [opt-out page](#).

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Meta Audience Network with actions performed on this Application. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#); Ireland – [Privacy Policy](#) – [Opt out](#).

Pinterest Ads (Pinterest, Inc.)

Pinterest Ads is an advertising service provided by Pinterest, Inc. that allows the Owner to run advertising campaigns on the Pinterest advertising network.

Users may opt out of behavioural advertising features through their device settings, their Pinterest [personalization settings](#).

Personal Data processed: device information; email address; Tracker; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Criteo (Criteo SA)

Criteo is an advertising service provided by Criteo SA.

Personal Data processed: Tracker; Usage Data.

Place of processing: France – [Privacy Policy](#) – [Opt Out](#).

BidSwitch (BidSwitch GmbH)

BidSwitch is an advertising service provided by BidSwitch GmbH.

Personal Data processed: Tracker; Usage Data.

Place of processing: Switzerland – [Privacy Policy](#) – [Opt out](#).

Zemanta (Zemanta Inc, a branch of Outbrain Inc.)

Zemanta is an advertising service provided by Zemanta Inc, a branch of Outbrain Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

TikTok conversion tracking (TikTok Inc.)

TikTok conversion tracking is an analytics and behavioural targeting service provided by TikTok Inc. that connects data from the TikTok advertising network with actions performed on this Application. The TikTok pixel tracks conversions that can be attributed to TikTok ads and enables to target groups of Users on the base of their past use of this Application.

Personal Data processed: Trackers.

Place of processing: United States – [Privacy Policy](#).

RTB House (RTB House S.A.)

RTB House is an advertising service provided by RTB House S.A.

Personal Data processed: Trackers; Usage Data.

Place of processing: Poland – [Privacy Policy](#) – [Opt out](#).

MGID (MGID Inc.)

MGID is an advertising service provided by MGID Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Analytics

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

Google Analytics (Universal Analytics) with anonymised IP (Google LLC)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, (“Google”). Google utilises 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 contextualise and personalise the ads of its own advertising network.

This integration of Google Analytics anonymises your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Yandex Metrica (YANDEX, LLC)

Yandex Metrica is an analytics and heat mapping service provided by YANDEX, LLC.

Yandex Metrica is used to display the areas of this Application that Users interact with most frequently. This shows where the points of interest are.

Personal Data processed: Tracker; Usage Data.

Place of processing: Russian Federation – [Privacy Policy](#).

Google Analytics 4 (Google LLC)

Google Analytics 4 is a web analysis service provided by Google LLC (“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. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google's official documentation](#).

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: number of Users; session statistics; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Commercial affiliation

This type of service allows this Application to display advertisements for third-party 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 third-party 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.

Awin (AWIN AG)

Awin is a commercial affiliation service provided by AWIN AG.

Personal Data processed: Tracker; Usage Data.

Place of processing: Germany – [Privacy Policy](#).

Admitad (Admitad AG)

Admitad is a commercial affiliation service provided by Admitad AG.

Personal Data processed: Tracker; Universally unique identifier (UUID); Usage Data.

Place of processing: Germany – [Privacy Policy](#).

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.

Google Fonts (Google LLC)

Google Fonts is a typeface visualisation service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Handling payments

Unless otherwise specified, this Application processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Application isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

Klarna (Klarna AB)

Klarna is a payment service provided by Klarna AB.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Sweden – [Privacy Policy](#).

Heat mapping and session recording

Heat mapping services are used to display the areas of this Application that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyse web traffic and keep track of User behaviour.

Some of these services may record sessions and make them available for later visual playback.

Microsoft Clarity (Microsoft Corporation)

Microsoft Clarity is a session recording and heat mapping service provided by Microsoft Corporation.

Microsoft processes or receives Personal Data via Microsoft Clarity, which in turn may be used for any purpose in accordance with the Microsoft Privacy Statement, including improving and providing Microsoft Advertising.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable this 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 services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Cloudinary (Cloudinary Ltd.)

Cloudinary is a hosting service provided by Cloudinary Ltd.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Israel – [Privacy Policy](#).

Algolia (Algolia SAS)

Algolia is a hosting and backend service provided by Algolia SAS.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: France – [Privacy Policy](#).

Managing support and contact requests

This type of service allows this Application to manage support and contact requests received via email or by other means, such as the contact form.

The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

Salesforce Service Cloud (Salesforce.com, inc.)

Salesforce Service Cloud is a support and contact request management service provided by salesforce.com, inc.

Personal Data processed: Data communicated while using the service; Tracker; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

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.

Guess.CookieWallSet

Allows the website to remember whether the user has accepted or declined the use of certain types of cookies, such as functional, analytical, or marketing cookies

Guess.CookieWallThirdParties

Set in the user's browser to store their consent preferences specifically for third-party cookies. This allows the website to remember whether the user has consented to the use of third-party cookies or has chosen to opt out

Guess.CustomerLocale

This cookie is used to enhance user experience by providing content in the user's preferred language or region.

Guess.selectedBrandId

Set in the user's browser to store their chosen brand ID or preference. This allows the website to remember the user's selection and provide a personalized experience by displaying content relevant to the selected brand.

guess_custom_isPWA

Distinguish PWA (progressive Web Apps) users

sfccSessionId

Used to maintain a user's session while they are navigating through a website powered by Salesforce Commerce Cloud. It typically contains a unique identifier that helps the platform recognize and track the user's session, enabling features such as maintaining login status, remembering items in the shopping cart, and personalizing the browsing experience

Salesforce Commerce Cloud (Salesforce, Inc.)

Salesforce Commerce Cloud is a platform provided by Salesforce, Inc. that allows the Owner to build, run and host an e-commerce website.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [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. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Facebook Oauth (Meta Platforms, Inc.)

Facebook Oauth is a registration and authentication service provided by Meta Platforms, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: Tracker; various types of Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Remarketing and behavioural targeting

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

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the

partners that manage the remarketing and behavioural targeting activity.

Some services offer a remarketing option based on email address lists.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Facebook Remarketing (Meta Platforms, Inc.)

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that connects the activity of this Application with the Facebook advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Facebook Custom Audience (Meta Platforms, Inc.)

Facebook Custom Audience is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that connects the activity of this Application with the Facebook advertising network.

Users can opt out of Facebook's use of Trackers for ads personalisation by visiting this [opt-out page](#).

Personal Data processed: email address; Tracker.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Criteo Dynamic Retargeting (Criteo SA)

Criteo Dynamic Retargeting is a remarketing and behavioural targeting service provided by Criteo SA., that connects the activity of this Application with the Criteo advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: France – [Privacy Policy](#) – [Opt Out](#).

TikTok Remarketing (TikTok Information Technologies UK Limited)

TikTok Remarketing is a remarketing and behavioural targeting service provided by TikTok Information Technologies UK Limited that connects the activity of this Application with the TikTok advertising network.

Personal Data processed: Usage Data.

Place of processing: United Kingdom – [Privacy Policy](#).

SPAM protection

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

Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralised fashion. 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 or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Tracker.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Traffic optimisation and distribution

This type of service allows this Application to distribute their content using servers located across different countries and to optimise their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimisation and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through this Application, i.e., communication between this Application and the User's browser, while also allowing analytical data from this Application to be collected.

Personal Data processed: Tracker.

Place of processing: United States – [Privacy Policy](#).

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Application, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Application.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Application.

Salesforce Marketing Cloud (Salesforce.com, inc.)

Salesforce Marketing Cloud is a User database management service provided by salesforce.com, inc.

Personal Data processed: Tracker; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Cookie Policy

This Application uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

Further Information for Users

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.

- 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.

Further information about 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 fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of 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 rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **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.
- **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 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 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.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organisation 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 enquire with the Owner using the information provided in the contact section.

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, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. 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. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

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) or 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.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying 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.

Definitions and legal references

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 utilised by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised 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 utilised 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 Processor)

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.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

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

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