

# Privacy Policy di [www.abc-strategy.eu](http://www.abc-strategy.eu)

Questo Sito Web raccoglie alcuni Dati Personali dei propri Utenti.

## Titolare del Trattamento dei Dati

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**Indirizzo email del Titolare:** [abc@abcproduction.com](mailto:abc@abcproduction.com)

## Tipologie di Dati raccolti

Fra i Dati Personali raccolti da questo Sito Web, in modo autonomo o tramite terze parti, ci sono: Strumenti di Tracciamento; Dati di utilizzo; numero di Utenti; città; informazioni sul dispositivo; statistiche delle sessioni; latitudine (della città); longitudine (della città); informazioni sul browser.

Dettagli completi su ciascuna tipologia di Dati Personali raccolti sono forniti nelle sezioni dedicate di questa privacy policy o mediante specifici testi informativi visualizzati prima della raccolta dei Dati stessi.

I Dati Personali possono essere liberamente forniti dall'Utente o, nel caso di Dati di Utilizzo, raccolti automaticamente durante l'uso di questo Sito Web.

Se non diversamente specificato, tutti i Dati richiesti da questo Sito Web sono obbligatori. Se l'Utente rifiuta di comunicarli, potrebbe essere impossibile per questo Sito Web fornire il Servizio. Nei casi in cui questo Sito Web indichi alcuni Dati come facoltativi, gli Utenti sono liberi di astenersi dal comunicare tali Dati, senza che ciò abbia alcuna conseguenza sulla disponibilità del Servizio o sulla sua operatività.

Gli Utenti che dovessero avere dubbi su quali Dati siano obbligatori sono incoraggiati a contattare il Titolare. L'eventuale utilizzo di Cookie - o di altri strumenti di tracciamento - da parte di questo Sito Web o dei titolari dei servizi terzi utilizzati da questo Sito Web ha la finalità di fornire il Servizio richiesto dall'Utente, oltre alle ulteriori finalità descritte nel presente documento e nella Cookie Policy.

L'Utente si assume la responsabilità dei Dati Personali di terzi ottenuti, pubblicati o condivisi mediante questo Sito Web.

## Modalità e luogo del trattamento dei Dati raccolti

### Modalità di trattamento

Il Titolare adotta le opportune misure di sicurezza volte ad impedire l'accesso, la divulgazione, la modifica o la distruzione non autorizzate dei Dati Personali.

Il trattamento viene effettuato mediante strumenti informatici e/o telematici, con modalità organizzative e con logiche strettamente correlate alle finalità indicate. Oltre al Titolare, in alcuni casi, potrebbero avere accesso ai Dati altri soggetti coinvolti nell'organizzazione di questo Sito Web (personale amministrativo, commerciale, marketing, legali, amministratori di sistema) ovvero soggetti esterni (come fornitori di servizi tecnici terzi, corrieri postali, hosting provider, società informatiche, agenzie di comunicazione) nominati anche, se necessario, Responsabili del Trattamento da parte del Titolare. L'elenco aggiornato dei Responsabili potrà sempre essere richiesto al Titolare del Trattamento.

### Luogo

I Dati sono trattati presso le sedi operative del Titolare ed in ogni altro luogo in cui le parti coinvolte nel trattamento siano localizzate. Per ulteriori informazioni, contatta il Titolare.

I Dati Personali dell'Utente potrebbero essere trasferiti in un paese diverso da quello in cui l'Utente si trova. Per ottenere ulteriori informazioni sul luogo del trattamento l'Utente può fare riferimento alla sezione relativa ai dettagli sul trattamento dei Dati Personali.

### Periodo di conservazione

Se non diversamente indicato in questo documento, i Dati Personali sono trattati e conservati per il tempo richiesto dalla finalità per la quale sono stati raccolti e potrebbero essere conservati per un periodo più lungo a causa di eventuali obbligazioni legali o sulla base del consenso degli Utenti.

## Finalità del Trattamento dei Dati raccolti

I Dati dell'Utente sono raccolti per consentire al Titolare di fornire il Servizio, adempiere agli obblighi di legge, rispondere a richieste o azioni esecutive, tutelare i propri diritti ed interessi (o quelli di Utenti o di terze parti), individuare eventuali attività dolose o fraudolente, nonché per le seguenti finalità: Statistica, Visualizzazione di contenuti da piattaforme esterne e Gestione dei tag.

Per ottenere informazioni dettagliate sulle finalità del trattamento e sui Dati Personali trattati per ciascuna finalità, l'Utente può fare riferimento alla sezione "Dettagli sul trattamento dei Dati Personali".

## Dettagli sul trattamento dei Dati Personali

I Dati Personali sono raccolti per le seguenti finalità ed utilizzando i seguenti servizi:

### Gestione dei tag

Questo tipo di servizi è funzionale alla gestione centralizzata dei tag o script utilizzati su questo Sito Web. L'uso di tali servizi comporta il fluire dei Dati dell'Utente attraverso gli stessi e, se del caso, la loro ritenzione.

#### Google Tag Manager

Google Tag Manager è un servizio di gestione dei tag fornito da Google LLC oppure da Google Ireland Limited, a seconda di come il Titolare gestisce il trattamento dei Dati.

Dati Personali trattati: Dati di utilizzo; Strumenti di Tracciamento.

Luogo del trattamento: Stati Uniti - [Privacy Policy](#); Irlanda - [Privacy Policy](#).

Categoria di informazioni personali raccolte ai sensi del CCPA: informazioni su relative alle attività su internet o altri network.

Questo tipo di trattamento costituisce:

- una vendita ai sensi del CCPA, CPA, CTDPA e UCPA
- pubblicità mirata ai sensi del CPA, CTDPA e UCPA

### Statistica

I servizi contenuti nella presente sezione permettono al Titolare del Trattamento di monitorare e analizzare i dati di traffico e servono a tener traccia del comportamento dell'Utente.

#### Google Analytics con IP anonimizzato

Google Analytics è un servizio di analisi web fornito da Google LLC oppure da Google Ireland Limited, a seconda di come il Titolare gestisce il trattamento dei Dati, ("Google"). Google utilizza i Dati Personali raccolti allo scopo di tracciare ed esaminare l'utilizzo di questo Sito Web, compilare report e condividerli con gli altri servizi sviluppati da Google.

Google potrebbe utilizzare i Dati Personali per contestualizzare e personalizzare gli annunci del proprio network pubblicitario.

Questa integrazione di Google Analytics rende anonimo il tuo indirizzo IP. L'anonimizzazione funziona abbreviando entro i confini degli stati membri dell'Unione Europea o in altri Paesi aderenti all'accordo sullo Spazio Economico Europeo l'indirizzo IP degli Utenti. Solo in casi eccezionali, l'indirizzo IP sarà inviato ai server di Google ed abbreviato all'interno degli Stati Uniti.

Dati Personali trattati: Dati di utilizzo; Strumenti di Tracciamento.

Luogo del trattamento: Stati Uniti - [Privacy Policy](#) - [Opt Out](#); Irlanda - [Privacy Policy](#) - [Opt Out](#).

Categoria di informazioni personali raccolte ai sensi del CCPA: informazioni su relative alle attività su internet o altri network.

Questo tipo di trattamento costituisce:

- una vendita ai sensi del CCPA, VCDPA, CPA, CTDPA e UCPA
- pubblicità mirata ai sensi del CPA, CTDPA e UCPA

#### Google Analytics

Google Analytics è un servizio di analisi web fornito da Google LLC oppure da Google Ireland Limited, a seconda di come il Titolare gestisce il trattamento dei Dati, ("Google"). Google utilizza i Dati Personali raccolti allo scopo di tracciare ed esaminare l'utilizzo di questo Sito Web, compilare report e condividerli con

gli altri servizi sviluppati da Google.

Google potrebbe utilizzare i Dati Personali per contestualizzare e personalizzare gli annunci del proprio network pubblicitario.

Dati Personali trattati: Dati di utilizzo; Strumenti di Tracciamento.

Luogo del trattamento: Stati Uniti - [Privacy Policy](#) - [Opt Out](#); Irlanda - [Privacy Policy](#) - [Opt Out](#).

Categoria di informazioni personali raccolte ai sensi del CCPA: informazioni su relative alle attività su internet o altri network.

Questo tipo di trattamento costituisce:

- una vendita ai sensi del CCPA, VCDPA, CPA, CTDPA e UCPA

#### **Google Analytics 4**

Google Analytics è un servizio di statistica fornito da Google LLC oppure da Google Ireland Limited, a seconda di come il Titolare gestisce il trattamento dei Dati, ("Google"). Google utilizza i Dati Personali raccolti allo scopo di tracciare ed esaminare l'uso di questo Sito Web, compilare report e condividerli con gli altri servizi sviluppati da Google.

Google potrebbe utilizzare i Dati Personali per contestualizzare e personalizzare gli annunci del proprio network pubblicitario.

In Google Analytics 4, gli indirizzi IP vengono utilizzati al momento della raccolta e poi eliminati prima che i dati vengano registrati in qualsiasi data center o server. Per saperne di più, è possibile consultare la [documentazione ufficiale di Google](#).

Dati Personali trattati: città; Dati di utilizzo; informazioni sul browser; informazioni sul dispositivo; latitudine (della città); longitudine (della città); numero di Utenti; statistiche delle sessioni; Strumenti di Tracciamento.

Luogo del trattamento: Stati Uniti - [Privacy Policy](#) - [Opt Out](#); Irlanda - [Privacy Policy](#) - [Opt Out](#).

Categoria di informazioni personali raccolte ai sensi del CCPA: identificatori; informazioni su relative alle attività su internet o altri network.

Questo tipo di trattamento costituisce:

- una vendita ai sensi del CCPA, VCDPA, CPA, CTDPA e UCPA
- pubblicità mirata ai sensi del CPA, CTDPA e UCPA

#### **Visualizzazione di contenuti da piattaforme esterne**

Questo tipo di servizi permette di visualizzare contenuti ospitati su piattaforme esterne direttamente dalle pagine di questo Sito Web e di interagire con essi.

Questo tipo di servizio potrebbe comunque raccogliere dati sul traffico web relativo alle pagine dove il servizio è installato, anche quando gli utenti non lo utilizzano.

#### **Google Fonts**

Google Fonts è un servizio di visualizzazione di stili di carattere gestito da Google LLC oppure da Google Ireland Limited, a seconda di come il Titolare gestisce il trattamento dei Dati, che permette a questo Sito Web di integrare tali contenuti all'interno delle proprie pagine.

Dati Personali trattati: Dati di utilizzo; Strumenti di Tracciamento.

Luogo del trattamento: Stati Uniti - [Privacy Policy](#); Irlanda - [Privacy Policy](#).

Categoria di informazioni personali raccolte ai sensi del CCPA: informazioni su relative alle attività su internet o altri network.

Questo tipo di trattamento costituisce:

- una vendita ai sensi del CCPA, VCDPA, CPA, CTDPA e UCPA
- pubblicità mirata ai sensi del CPA, CTDPA e UCPA

#### **Cookie Policy**

Questo Sito Web fa utilizzo di Strumenti di Tracciamento. Per saperne di più, gli Utenti possono consultare la [Cookie Policy](#).

# Ulteriori informazioni sul trattamento

## Difesa in giudizio

I Dati Personali dell'Utente possono essere utilizzati da parte del Titolare in giudizio o nelle fasi preparatorie alla sua eventuale instaurazione per la difesa da abusi nell'utilizzo di questo Sito Web o dei Servizi connessi da parte dell'Utente.

L'Utente dichiara di essere consapevole che il Titolare potrebbe essere obbligato a rivelare i Dati per ordine delle autorità pubbliche.

## Informative specifiche

Su richiesta dell'Utente, in aggiunta alle informazioni contenute in questa privacy policy, questo Sito Web potrebbe fornire all'Utente delle informative aggiuntive e contestuali riguardanti Servizi specifici, o la raccolta ed il trattamento di Dati Personali.

## Log di sistema e manutenzione

Per necessità legate al funzionamento ed alla manutenzione, questo Sito Web e gli eventuali servizi terzi da essa utilizzati potrebbero raccogliere log di sistema, ossia file che registrano le interazioni e che possono contenere anche Dati Personali, quali l'indirizzo IP Utente.

## Informazioni non contenute in questa policy

Ulteriori informazioni in relazione al trattamento dei Dati Personali potranno essere richieste in qualsiasi momento al Titolare del Trattamento utilizzando gli estremi di contatto.

## Modifiche a questa privacy policy

Il Titolare del Trattamento si riserva il diritto di apportare modifiche alla presente privacy policy in qualunque momento notificandolo agli Utenti su questa pagina e, se possibile, su questo Sito Web nonché, qualora tecnicamente e legalmente fattibile, inviando una notifica agli Utenti attraverso uno degli estremi di contatto di cui è in possesso. Si prega dunque di consultare con frequenza questa pagina, facendo riferimento alla data di ultima modifica indicata in fondo.

Qualora le modifiche interessino trattamenti la cui base giuridica è il consenso, il Titolare provvederà a raccogliere nuovamente il consenso dell'Utente, se necessario.

## Further information for California consumers

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Website and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

This section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the state of California, United States of America, according to the "[California Consumer Privacy Act of 2018](#)" (the "CCPA"), as updated by the "California Privacy Rights Act" (the "CPRA") and subsequent regulations. For such consumers, this section supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term "personal information" as defined in the California Consumer Privacy Act (CCPA/CPRA).

## Notice at collection

### Categories of personal information collected, used, sold, or shared

In this section we summarize the categories of personal information that we've collected, used, sold, or shared and the purposes thereof. **You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.**

### Information we collect: the categories of personal information we collect

We have collected the following categories of personal information about you: identifiers and internet or other electronic network activity information.

We do not collect sensitive personal information.

We will not collect additional categories of personal information without notifying you.

**What are the purposes for which we use your personal information?**

We may use your personal information to allow the operational functioning of this Website and features thereof (“business purposes”). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section “Detailed information on the processing of Personal Data” within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

**How long do we keep your personal information?**

Unless stated otherwise inside the “Detailed information on the processing of Personal Data” section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

**How we collect information: what are the sources of the personal information we collect?**

We collect the above-mentioned categories of personal information, either directly or indirectly, from you when you use this Website.

For example, you directly provide your personal information when you submit requests via any forms on this Website. You also provide personal information indirectly when you navigate this Website, as personal information about you is automatically observed and collected.

Finally, we may collect your personal information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

**How we use the information we collect: disclosing of your personal information with third parties for a business purpose**

For our purposes, the word “third party” means a person who is not any of the following: a service provider or a contractor, as defined by the CCPA.

We disclose your personal information with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

**Sale or sharing of your personal information**

For our purposes, the word “sale” means any “selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer’s personal information by the business to **a third party, for monetary or other valuable consideration**”, as defined by the CCPA.

This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

For our purposes, the word “sharing” means any “sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged”, as defined by the CCPA.

Please note that the exchange of personal information with a service provider pursuant to a written contract that meets the requirements set by the CCPA, does not constitute a sale or sharing of your personal information.

**Your right to opt out of the sale or sharing of your personal information and how you can exercise it**

We sell or share your personal information with the third parties **listed in detail in the section titled**

**“Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

You have the right to opt out of the sale or sharing of your personal information. This means that whenever you request us to stop selling or sharing your personal information, we will abide by your request. Such requests can be made freely, at any time, without submitting any verifiable request. To fully exercise your right to opt out, you can contact us at any time using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

If you want to submit requests to opt out of the sale or sharing of personal information via a user-enabled global privacy control, like the Global Privacy Control (“[GPC](#)”), you are free to do so and we will abide by such request in a frictionless manner (as defined in the CPRA regulations). The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a [participating browser](#) or browser extension. More information about downloading GPC is available [here](#).

We use any personal information collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Once you have opted out, we are required to wait at least 12 months before asking whether you have changed your mind.

#### **What are the purposes for which we use your personal information?**

We may use your personal information to allow the operational functioning of this Website and features thereof (“business purposes”). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section “Detailed information on the processing of Personal Data” within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

#### **How long do we keep your personal information?**

Unless stated otherwise inside the “Detailed information on the processing of Personal Data” section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

### **Your privacy rights under the California Consumer Privacy Act and how to exercise them**

#### **The right to access personal information: the right to know and to portability**

You have the right to request that we disclose to you:

- the categories of personal information that we collect about you;
- the sources from which the personal information is collected;
- the purposes for which we use your information;
- to whom we disclose such information;
- the specific pieces of personal information we have collected about you.

You also have **the right to know what personal information is sold or shared and to whom**. In particular, you have the right to request two separate lists from us where we disclose:

- the categories of personal information that we sold or shared about you and the categories of third parties to whom the personal information was sold or shared;
- the categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

The disclosure described above will be limited to the personal information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an

easily usable format to enable you to transmit the information to another entity without hindrance — provided that this is technically feasible.

### **The right to request the deletion of your personal information**

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on this Website, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and notify any of our service providers and all third parties to whom we have sold or shared the personal information to do so — provided that this is technically feasible and doesn't involve disproportionate effort.

### **The right to correct inaccurate personal information**

You have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

### **The right to opt out of sale or sharing of personal information and to limit the use of your sensitive personal information**

You have the right to opt out of the sale or sharing of your personal information. You also have the right to request that we limit our use or disclosure of your sensitive personal information.

### **The right of no retaliation following opt-out or exercise of other rights (the right to non-discrimination)**

We will not discriminate against you for exercising your rights under the CCPA. This means that we will not discriminate against you, including, but not limited to, by denying goods or services, charging you a different price, or providing a different level or quality of goods or services just because you exercised your consumer privacy rights.

However, if you refuse to provide your personal information to us or ask us to delete or stop selling your personal information, and that personal information or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction.

To the extent permitted by the law, we may offer you promotions, discounts, and other deals in exchange for collecting, keeping, or selling your personal information, provided that the financial incentive offered is reasonably related to the value of your personal information.

### **How to exercise your rights**

To exercise the rights described above, you need to submit your verifiable request to us by contacting us via the details provided in this document.

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will use any personal information collected from you in connection with the verification of your request solely for the purposes of verification and shall not further disclose the personal information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

If you are an adult, you can make a verifiable request on behalf of a child under your parental authority.

You can submit a maximum number of 2 requests over a period of 12 months.

## How and when we are expected to handle your request

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Our disclosure(s) will cover the preceding 12-month period. Only with regard to personal information collected on or after January 1, 2022, you have the right to request that we disclose information beyond the 12-month period, and we will provide them to you unless doing so proves impossible or would involve a disproportionate effort.

Should we deny your request, we will explain you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee, or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind it.

## Further information for Virginia consumers

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the Commonwealth of Virginia, according to the [“Virginia Consumer Data Protection Act”](#) (the “VCDPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the VCDPA.

## Categories of personal data processed

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

### Categories of personal data we collect

We have collected the following categories of personal data: identifiers, internet information and geolocation data

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

### Why we process your personal data

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

### How we use the data we collect: sharing of your personal data with third parties

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a natural or legal person, public authority, agency, or body other than the consumer, controller, processor, or an affiliate of the processor or the controller" as defined by the VCDPA.

### Sale of your personal data



For our purposes, the word “sale” means any “exchange of personal data for monetary consideration by us to a third party” as defined by the VCDPA.

Please note that according to the VCDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the VCDPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal information may be considered a sale under VCDPA.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

We do not process your personal data for targeted advertising. If we decide to do so, we will inform you beforehand and will grant your right to opt out of the processing of your personal data for targeted advertising.

### **Your privacy rights under the Virginia Consumer Data Protection Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- **access personal data: the right to know.** You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- **correct inaccurate personal data.** You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- **request the deletion of your personal data.** You have the right to request that we delete any of your personal data.
- **obtain a copy of your personal data.** We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity — provided that this is technically feasible.
- **opt out of the processing of your personal data for the purposes of targeted advertising**, the **sale of personal data**, or **profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **non-discrimination.** We will not discriminate against you for exercising your rights under the VCDPA. This means that we will not, among other things, deny goods or services, charge you a different price, or provide a different level or quality of goods or services just because you exercised your consumer privacy rights. However, if you refuse to provide your personal data to us or ask us to delete or stop selling your personal data, and that personal data or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction. To the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if you have exercised your right to opt out, or our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

### **How to exercise your rights**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your

request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

### **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 60 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to two requests per year. If your request is manifestly unfounded, excessive or repetitive, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

## **Further information for Colorado consumers**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running questo Sito Web and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Colorado, according to the “Colorado Privacy Act” (the “CPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the CPA.

### **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

#### **Categories of personal data we collect**

We have collected the following categories of personal data: identificatori, informazioni su Internet e dati di geolocalizzazione

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

#### **Why we process your personal data**

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

#### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CPA.

## **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the CPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CPA.

Please note that according to the CPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on questo Sito Web.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

## **Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CPA.

Please note that according to the CPA, targeted advertising does not include: “advertisements directed to a consumer in response to the consumer's request for information or feedback; advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; or processing personal data solely to measure or report advertising frequency, performance or reach”.

### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on questo Sito Web.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

### **Universal opt-out mechanism: Global privacy control**

If you want to submit requests to opt-out of the sale of personal data o the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control (“[GPC](#)”), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

## **Your privacy rights under the Colorado Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do

the following:

- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

### **How to exercise your rights**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

### **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may contact the Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to two requests per year.

## **Further information for Connecticut consumers**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running questo Sito Web and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Connecticut, according to “An Act Concerning Personal Data Privacy and Online Monitoring ” (also known as “The Connecticut Data Privacy Act” or the “CTDPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the CTDPA.

## **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

### **Categories of personal data we collect**

We have collected the following categories of personal data: identificatori, informazioni su Internet e dati di geolocalizzazione

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

### **Why we process your personal data**

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CTDPA.

### **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the CTDPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CTDPA.

Please note that according to the CTDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CTDPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on questo Sito Web.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across non affiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CTDPA.

Please note that according to the CTDPA, targeted advertising does not include: “advertisements based on activities within a controller's own web sites or online applications; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; advertisements directed to a consumer in response to the consumer's request for information or feedback; or processing personal data solely to measure or report advertising frequency, performance or reach”.

### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on questo Sito Web.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

### **Universal opt-out mechanism: Global privacy control**

If you want to submit requests to opt-out of the sale of personal data o the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control (“[GPC](#)”), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

### **Your privacy rights under the Connecticut Data Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

### **How to exercise your rights**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your

request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

### **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to one request per year.

## **Ulteriori informazioni per i consumatori dello Utah**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running questo Sito Web and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Utah, according to the “Consumer Privacy Act” (the “UCPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the UCPA.

### **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

#### **Categories of personal data we collect**

We have collected the following categories of personal data: identificatori, informazioni su Internet e dati di geolocalizzazione

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

#### **Why we process your personal data**

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

#### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person other than: the consumer, controller, or processor; or an affiliate or contractor of the controller or the processor" as defined by the UCPA.

#### **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the UCPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or

other valuable consideration by a controller to a third party" as defined by the UCPA.

Please note that according to the UCPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the UCPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

#### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on questo Sito Web.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

#### **Processing of your personal data for targeted advertising**

As specified in the "Detailed information on the processing of Personal Data" section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by UCPA.

Please note that according to the UCPA, targeted advertising does not include: "advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to a web site or online application; advertisements directed to a consumer in response to the consumer's request for information, product, a service or feedback; or processing personal data solely to measure or report advertising performance, reach or frequency."

#### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on questo Sito Web.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

#### **Your privacy rights under the Utah Consumer Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising or the sale of personal data.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or



services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

### **How to exercise your rights**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request. We may retain your email address to respond to your request.

If you are an adult, you can make a request on behalf of a child under your parental authority.

### **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request.

We do not charge a fee to respond to your request, for up to one request per year.

## **Ulteriori informazioni per gli Utenti in Brasile**

Questa sezione del documento integra e completa le informazioni contenute nel resto della privacy policy ed è fornita dall'entità che gestisce questo Sito Web e, se del caso, dalla sua capogruppo e dalle sue controllate e affiliate (ai fini di questa sezione denominate collettivamente "noi", "nostro" o "nostra").

Questa sezione si applica a tutti gli Utenti in Brasile (tali Utenti sono indicati di seguito semplicemente come "tu", "tuo", "voi" o "vostro"), ai sensi della "Lei Geral de Proteção de Dados e, per tali Utenti, prevale su qualsiasi altra informazione eventualmente divergente o in contrasto contenuta nella presente privacy policy.

In questa parte del documento viene utilizzato il termine "informazioni personali" così come definito dalla **LGPD**.

### **Basi giuridiche in virtù delle quali trattiamo le tue informazioni personali**

Trattiamo le tue informazioni personali esclusivamente nel caso in cui sussista una delle basi giuridiche per tale trattamento. Le basi giuridiche sono le seguenti:

- il tuo consenso alle attività di trattamento in questione;
- l'adempimento ad obblighi di legge che siamo tenuti a soddisfare;
- l'esecuzione di norme dettate da leggi o regolamenti o da contratti, accordi o altri simili strumenti giuridici;
- gli studi condotti da enti di ricerca, preferibilmente effettuati su informazioni personali anonimizzate;
- l'esecuzione di un contratto e dei relativi adempimenti precontrattuali, qualora tu sia parte di tale contratto;
- l'esercizio dei nostri diritti in giudizio, in procedure amministrative o in arbitrati;
- la difesa o l'incolumità fisica tua o di un terzo;
- la tutela della salute - nel contesto di procedure messe in atto da entità o professionisti del settore sanitario;
- il nostro legittimo interesse, a condizione che i tuoi diritti e libertà fondamentali non prevalgano su tali interessi; e
- la tutela del credito.

Per sapere di più riguardo alle basi giuridiche, puoi contattarci in qualsiasi momento utilizzando i recapiti forniti in questo documento.

### **Categorie di informazioni personali trattate**

Per sapere quali sono categorie di informazioni personali trattate, puoi fare riferimento alla sezione "Dettagli sul trattamento dei Dati Personali" presente in questo documento.

## Perchè trattiamo le tue informazioni personali

Per sapere perchè trattiamo le tue informazioni personali, fai riferimento alle sezioni “Dettagli sul trattamento dei Dati Personali” e “Finalità del Trattamento dei Dati raccolti” presente in questo documento.

## I tuoi diritti relativi alla privacy in Brasile, come inoltrare una richiesta e come verrà gestita da noi

### I tuoi diritti relativi alla privacy in Brasile

Hai il diritto di:

- ottenere conferma della esistenza di attività di trattamento riguardanti le tue informazioni personali;
- accedere alle tue informazioni personali;
- ottenere la rettifica delle tue informazioni personali incomplete, inaccurate o non aggiornate;
- ottenere l’anonimizzazione, il blocco o la cancellazione delle informazioni personali non necessarie o eccessive, o di quelle informazioni che sono trattate in contrasto alle disposizioni della LGPD;
- ottenere informazioni riguardo la possibilità di prestare o rifiutare il tuo consenso e le relative conseguenze;
- ottenere informazioni riguardo le terze parti con le quali condividiamo le tue informazioni personali;
- ottenere, a fronte di una tua richiesta esplicita, la portabilità delle tue informazioni personali (ad eccezione delle informazioni anonimizzate) verso altri fornitori di prodotti o servizi, a condizione che i nostri segreti commerciali e industriali siano salvaguardati;
- ottenere la cancellazione delle informazioni personali trattate qualora il trattamento sia stato effettuato sulla base del tuo consenso, a meno che sia applicabile una o più delle eccezioni previste dell’articolo 16 LGPD;
- revocare il tuo consenso in qualsiasi momento;
- presentare un reclamo riguardante le tue informazioni personali all’ANPD (Autorità Nazionale di Protezione dei Dati) o ad un organismo di tutela dei consumatori;
- opporsi ad attività di trattamento nei casi in cui tale trattamento non sia effettuato in conformità alle disposizioni di legge;
- richiedere informazioni chiare ed adeguate riguardo ai criteri e alle procedure utilizzate nell’ambito dei processi decisionali automatizzati; e
- richiedere la revisione delle decisioni che ledono i tuoi interessi, effettuate esclusivamente sulla base di processi decisionali automatizzati delle tue informazioni personali. Queste includono le decisioni per delineare il tuo profilo personale, professionale, di consumatore o creditore, o altri spetti della tua personalità.

Non sarai mai discriminato, né subirai in alcun modo alcun trattamento che ti sia sfavorevole, a seguito dell’esercizio dei tuoi diritti.

### Come inoltrare una richiesta

Puoi inoltrare una richiesta esplicita per esercitare i tuoi diritti a titolo gratuito, in qualsiasi momento, utilizzando i recapiti presenti in questo documento o tramite il tuo legale rappresentante.

### Come e in quanto tempo gestiremo la tua richiesta

Faremo il possibile per rispondere alla tua richiesta nel più breve tempo possibile.

In ogni caso, se per noi fosse impossibile farlo, ci assicureremo di comunicarti le ragioni fattuali o legali che ci impediscono di soddisfare immediatamente o di dar seguito alla tua richiesta. Qualora le tue informazioni personali non siano processate da noi, se saremo in grado di farlo, ti indicheremo la persona fisica o giuridica alla quale rivolgere le tue richieste.

Nel caso in cui tu decida di inoltrare una richiesta di **accesso** o una richiesta di **conferma dell’esistenza del trattamento** di informazioni personali, ti preghiamo di assicurarti di specificare se preferisci ricevere le tue informazioni personali in formato elettronico o cartaceo.

Dovrai inoltre farci sapere se desideri una risposta immediata, nel qual caso riceverai una risposta semplificata, o se invece necessiti di una informativa completa.

In quest’ultimo caso, risponderemo entro 15 giorni dal momento della tua richiesta, fornendoti tutte le informazioni riguardanti l’origine delle tue informazioni personali, la conferma o meno dell’esistenza di informazioni personali che ti riguardano, tutti i criteri utilizzati per il trattamento e le finalità di tale trattamento, salvaguardando al contempo i nostri segreti commerciali e industriali.

Nel caso in cui tu decida di inoltrare una richiesta di **rettifica, cancellazione, anonimizzazione o blocco delle informazioni personali**, ci assicureremo di informare immediatamente della tua richiesta le altre parti con le quali abbiamo condiviso le tue informazioni personali in modo che esse possano a loro volta soddisfare la tua richiesta - ad esclusione dei casi in cui una tale comunicazione risulti per noi impossibile o

eccessivamente onerosa.

## **Trasferimento delle informazioni personali al di fuori del Brasile nei casi consentiti dalla legge**

Possiamo trasferire le tue informazioni personali al di fuori del territorio brasiliano nei seguenti casi:

- quando il trasferimento è necessario per la cooperazione giuridica internazionale tra i servizi di intelligence, gli organi investigativi e di procedura penale, così come previsto dagli strumenti messi a disposizione dal diritto internazionale;
- quando il trasferimento è necessario per difendere la vita o l'incolumità fisica tua o di terze parti;
- quando il trasferimento è autorizzato dall'ANPD;
- quando il trasferimento deriva da un'obbligazione assunta nel contesto di un accordo di cooperazione internazionale;
- quando il trasferimento è necessario all'esercizio di un ordine pubblico o per l'espletamento di un pubblico servizio;
- quando il trasferimento è necessario per l'adempimento di un obbligo di legge, l'esecuzione di un contratto e dei relativi adempimenti precontrattuali, o il normale esercizio di diritti in sede giudiziaria, amministrativa o in sede arbitrale.

## **Definizioni e riferimenti legali**

### **Dati Personali (o Dati)**

Costituisce dato personale qualunque informazione che, direttamente o indirettamente, anche in collegamento con qualsiasi altra informazione, ivi compreso un numero di identificazione personale, renda identificata o identificabile una persona fisica.

### **Dati di Utilizzo**

Sono le informazioni raccolte automaticamente attraverso questo Sito Web (anche da applicazioni di parti terze integrate in questo Sito Web), tra cui: gli indirizzi IP o i nomi a dominio dei computer utilizzati dall'Utente che si connette con questo Sito Web, gli indirizzi in notazione URI (Uniform Resource Identifier), l'orario della richiesta, il metodo utilizzato nell'inoltrare la richiesta al server, la dimensione del file ottenuto in risposta, il codice numerico indicante lo stato della risposta dal server (buon fine, errore, ecc.) il paese di provenienza, le caratteristiche del browser e del sistema operativo utilizzati dal visitatore, le varie connotazioni temporali della visita (ad esempio il tempo di permanenza su ciascuna pagina) e i dettagli relativi all'itinerario seguito all'interno dell'Applicazione, con particolare riferimento alla sequenza delle pagine consultate, ai parametri relativi al sistema operativo e all'ambiente informatico dell'Utente.

### **Utente**

L'individuo che utilizza questo Sito Web che, salvo ove diversamente specificato, coincide con l'Interessato.

### **Interessato**

La persona fisica cui si riferiscono i Dati Personali.

### **Responsabile del Trattamento (o Responsabile)**

La persona fisica, giuridica, la pubblica amministrazione e qualsiasi altro ente che tratta dati personali per conto del Titolare, secondo quanto esposto nella presente privacy policy.

### **Titolare del Trattamento (o Titolare)**

La persona fisica o giuridica, l'autorità pubblica, il servizio o altro organismo che, singolarmente o insieme ad altri, determina le finalità e i mezzi del trattamento di dati personali e gli strumenti adottati, ivi comprese le misure di sicurezza relative al funzionamento ed alla fruizione di questo Sito Web. Il Titolare del Trattamento, salvo quanto diversamente specificato, è il titolare di questo Sito Web.

### **Questo Sito Web (o questa Applicazione)**

Lo strumento hardware o software mediante il quale sono raccolti e trattati i Dati Personali degli Utenti.

### **Servizio**

Il Servizio fornito da questo Sito Web così come definito nei relativi termini (se presenti) su questo sito/applicazione.

### **Unione Europea (o UE)**

Salvo ove diversamente specificato, ogni riferimento all'Unione Europea contenuto in questo documento si intende esteso a tutti gli attuali stati membri dell'Unione Europea e dello Spazio Economico Europeo.

### **Cookie**

I Cookie sono Strumenti di Tracciamento che consistono in piccole porzioni di dati conservate all'interno del browser dell'Utente.

### **Strumento di Tracciamento**

Per Strumento di Tracciamento s'intende qualsiasi tecnologia - es. Cookie, identificativi univoci, web beacons, script integrati, e-tag e fingerprinting - che consenta di tracciare gli Utenti, per esempio raccogliendo o salvando informazioni sul dispositivo dell'Utente.

### **Riferimenti legali**

La presente informativa privacy è redatta sulla base di molteplici ordinamenti legislativi.

Ove non diversamente specificato, questa informativa privacy riguarda esclusivamente questo Sito Web.

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