



PRIVACY POLICY OF WWW.ORIZZONTILAKECOMO.COM

This Web Site collects certain Personal Data from its Users.

This document contains a section for California consumers and their privacy rights.

This document contains a section dedicated to Users residing in Brazil and their privacy rights.

This document can be printed using the print command in the settings of any browser.

DATA CONTROLLER

ORIZZONTI DI P.I.

VAT No. IT03643420130

Holder's email address: info@orizzontilakecomo.com

TYPES OF DATA COLLECTED

Among the Personal Data collected by this Website, either autonomously or through third parties, there are: name; surname; phone number; email; Cookie; Usage Data; unique identifiers of devices for advertising (Google Advertiser ID or IDFA identifier, for example); payment information; physical address; company name.

Full details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific informational texts displayed prior to the collection of the data itself.

Personal Data may be freely provided by the User or, in the case of Usage Data, automatically collected during the use of this Web Site.

Unless otherwise specified, all Data requested by this Web Site is mandatory. If the User refuses to provide it, it may be impossible for this Web Site to provide the Service. In cases where this Website indicates certain Data as optional, Users are free to refrain from communicating such Data, without this having any effect on the availability of the Service or its operation.

Users who may have doubts as to which Data is mandatory are encouraged to contact the Data Controller.

Any use of Cookies - or other tracking tools - by this Website or by the owners of third party services used by this Website, unless otherwise specified, is for the purpose of providing the Service requested by the User, in addition to the further purposes described in this document and in the Cookie Policy, if available.

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

METHOD AND PLACE OF TREATMENT OF COLLECTED DATA

Treatment modalities

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

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

Legal basis of the treatment

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

- the User has given consent for one or more specific purposes; Note: in some jurisdictions, the Data Controller may be authorized to process Personal Data without the need for the User's consent or another of the legal bases specified below, until the User objects ("opts-out") to such processing. However, this does not apply where the processing of Personal Data is governed by European legislation on the protection of Personal Data;
- the processing is necessary for the performance of a contract with the User and/or the execution of pre-contractual measures;
- the processing is necessary for the performance of a legal obligation to which the Data Controller is subject;
- the processing is necessary for the performance of a task of public interest or for the exercise of public powers vested in the Data Controller;
- the processing is necessary for the pursuit of the legitimate interest of the Controller or of third parties.



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

Place

The Data are processed at the operational headquarters of the Data Controller and in any other place where the parties involved in the processing are located. For more information, please contact the Data Controller.

Your Personal Data may be transferred to a country other than the one in which you are located. You may refer to the section on details of the processing of Personal Data to obtain further information on the location of the processing.

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

The User may verify whether one of the transfers just described takes place by examining the section of this document relating to details on the processing of Personal Data or request information from the Data Controller by contacting it at the contact details given at the beginning.

Period of retention

Data is processed and stored for the time required by the purposes for which it was collected.

Therefore:

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

When the processing is based on the User's consent, the Controller may keep the Personal Data longer until such consent is revoked. In addition, the Controller may be obliged to retain Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

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

PURPOSES OF DATA COLLECTION

The User's Data are collected to allow the Data Controller to provide the Service, fulfill legal obligations, respond to requests or enforcement actions, protect its rights and interests (or those of Users or third parties), detect any malicious or fraudulent activities, and for the following purposes: Contacting the User, Statistics, Platform and hosting services, Displaying content from external platforms, Advertising, Remarketing and behavioral targeting, Content and functionality performance testing (A/B testing), Tag management, Managing landing pages and invitation pages, Managing contacts and sending messages, Managing payments and Interaction with social networks and external platforms.

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

PERSONAL DATA PROCESSING DETAILS

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

Contacting the User

Contact form (this Website)

The User, by filling out the contact form with their data, consent to their use to respond to requests for information, quotes, or any other nature indicated by the header of the form.

Personal data processed: last name; email; name; phone number.

Category of personal information collected under the CCPA: identifiers.

Mailing list or newsletter (this Website)



By registering to the mailing list or newsletter, the User's email address is automatically added to a list of contacts to whom email messages may be sent containing information, including commercial and promotional information, relating to this Web Site. The User's email address may also be added to this list as a result of registering with this Web Site or after making a purchase.

Personal Data Processed: last name; email; first name; phone number.

Category of personal information collected under the CCPA: identifiers.

Contact by phone (this Web Site)

Users who have provided their telephone number may be contacted for commercial or promotional purposes related to this Web Site, as well as to fulfill support requests.

Personal Information Processed: Phone Number.

Category of personal information collected under the CCPA: identifiers.

Managing contacts and sending messages

This type of service allows you to manage a database of email contacts, telephone contacts or contacts of any other type used to communicate with the User.

These services may also allow the collection of data relating to the date and time of viewing of messages by the User, as well as the User's interaction with them, such as information on clicks on links included in messages.

Mailchimp (The Rocket Science Group LLC)

Mailchimp is an address management and email message delivery service provided by The Rocket Science Group LLC.

Personal Data Processed: last name; email; first name; phone number.

Place of processing: United States - Privacy Policy.

Category of personal information collected under the CCPA: identifiers.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing the rights of Californian consumers for information on how to opt-out of the sale.

Payment Processing

Unless otherwise specified, this Website processes all payments by credit card, wire transfer or other means through third party payment service providers. In general, and unless otherwise specified, Users are asked to provide payment details and personal information directly to such payment service providers.

This Website is not involved in the collection and processing of such information; instead, you will only receive notification from the payment service provider in question that payment has been made.

PayPal (Paypal)

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

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

Place of treatment: See the privacy policy of PayPal - Privacy Policy.

Category of Personal Information collected under the CCPA: Internet information.

Payment by Wire Transfer (this Website)

In the event that the payment method chosen is the direct bank transfer to the current account indicated by this Website, the Owner will collect the data relating to the User's payment, i.e. the account number of the payer, the SWIFT code, the Bank and the name of the payer. This data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data Processed: Last Name; Physical Address; Payment Information; First Name; Business Name.

Category of personal information collected under the CCPA: identifiers; business information.

Stripe

Stripe is a payment service provided by Stripe Inc, Stripe Technology Europe Ltd or Stripe Payments Ltd, depending on where this Website is used.

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

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy; United Kingdom - Privacy Policy.

Category of Personal Information collected under the CCPA: Internet information.

Tag Management



This type of service is functional to the centralized management of tags or scripts used on this Website. The use of these services involves the flow of User Data through them and, where appropriate, their retention.

Google Tag Manager

Google Tag Manager is a tag management service provided by Google LLC or Google Ireland Limited, depending on where this Web Site is used.

Personal Data Processed: Usage Data.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing California consumer rights for information regarding how to opt-out of the sale.

Management of landing pages and invitation pages

This type of service allows you to build and manage landing pages and invitation pages, i.e., presentation pages of a product or service, which may allow the inclusion of your contact information, such as email address.

The management of these pages involves the processing, by these services, of Personal Data collected through these pages, including Usage Data.

Mailchimp Landing Page (The Rocket Science Group LLC)

Mailchimp Landing Page is a landing page management service provided by The Rocket Science Group LLC that allows this Website to collect email addresses of Users interested in its service.

Mailchimp Landing Page allows the Data Controller to track and analyze the response from the User, in terms of traffic or behavior, in relation to changes in the structure, text or any other component of the landing pages created.

Personal data processed: last name; email; first name; phone number.

Place of processing: United States - Privacy Policy.

Category of personal information collected under the CCPA: identifiers.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing the rights of Californian consumers for information on how to opt-out of the sale.

Interaction with social networks and external platforms

This type of service allows for interactions with social networks, or other external platforms, directly from the pages of this Website.

Interactions and information acquired by this Website are in any case subject to the User's privacy settings for each social network.

This type of service may still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to disconnect from the respective services to ensure that the data processed on this Website is not linked back to the User's profile.

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

The Tweet button and Twitter social widgets are services for interaction with the Twitter social network, provided by Twitter, Inc.

Personal Data Processed: Usage Data; Tracking Tool.

Place of processing: United States - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may refer to the section describing the rights of California consumers for information regarding how to opt-out of the sale.

Facebook Like Button and Social Widgets

The Facebook "Like" button and social widgets are Facebook social network interaction services provided by Facebook, Inc. or Facebook Ireland Ltd, depending on where this Website is used,

Personal Data Processed: Usage Data; Tracking Tool.

Place of Processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of Personal Information collected under the CCPA: Internet Information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, you may refer to the section describing your rights as a California consumer for information regarding how to opt-out of the sale.

Pinterest "Pin it" button and social widgets (Pinterest, Inc.)

Pinterest's "Pin it" button and social widgets are services for interacting with the Pinterest platform, provided by Pinterest Inc.

Personal Data Processed: Usage Data; Tracking Tool.



Place of processing: United States - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing the rights of Californian consumers for information on how to opt-out of the sale.

Platform and Hosting Services

These services are intended to host and operate key components of this Website, making it possible to deliver this Website from a single platform. These platforms provide the Owner with a wide range of tools such as, for example, analytical tools, user registration management, comment and database management, e-commerce, payment processing etc. The use of these tools involves the collection and processing of Personal Data. Some of these services operate through servers located geographically in different locations, making it difficult to determine the exact location where Personal Data is stored.

WordPress.com (Automattic Inc.)

WordPress.com is a platform provided by Automattic Inc. that enables the Owner to develop, operate and host this Website.

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

Place of processing: United States - Privacy Policy.

Category of Personal Information collected under the CCPA: Internet information.

Advertising

This type of service allows the use of User Data for marketing communication purposes. These communications are displayed on this Website in the form of banners and other forms of advertising, including in relation to the User's interests.

This does not mean that all Personal Data is used for this purpose. Data and conditions of use are set out below.

Some of the services indicated below may use Tracking Tools to identify the User or use the technique of behavioral retargeting, i.e. displaying advertisements that are personalized based on the User's interests and behavior, also detected outside of this Website. For more information on this, we suggest you check the privacy policies of the respective services.

In addition to the opt-out features offered by the services below, Users may opt-out by visiting the Network Advertising Initiative opt-out page.

Users may also opt-out of certain advertising features through corresponding device configuration options, such as mobile device advertising configuration options or generic advertising configuration.

Google Ad Manager

Google Ad Manager is an advertising service provided by Google LLC or Google Ireland Limited, depending on where this Website is used, with which the Owner may conduct advertising campaigns in conjunction with external advertising networks with which the Owner, unless otherwise specified herein, has no direct relationship.

Users who do not wish to be tracked by the different advertising networks may use Youronlinechoices. For an understanding of Google's use of data, please see Google's partner policy.

This service uses the cookie "DoubleClick", which tracks the use of this website and the behavior of the User in relation to advertisements, products and services offered. The User can decide at any time to disable all DoubleClick cookies by going to: Ads Settings.

Personal Data Processed: Usage Data; Tracking Tool.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing California consumer rights for information regarding how to opt-out of the sale.

Google AdSense

Google AdSense is an advertising service provided by Google LLC or Google Ireland Limited, depending on where this Website is used. This service uses the Cookie "DoubleClick", which tracks the use of this Web Site and the behavior of the User in relation to advertisements, products and services offered.

The User can decide at any time to disable all DoubleClick cookies by going to: Ads Settings.

Personal Data Processed: Usage Data; Tracking Tool.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Category of personal information collected under the CCPA: Internet information.



This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, you may consult the section describing your rights as a California consumer for information regarding how to opt out of the sale.

Remarketing and behavioral targeting

This type of service allows this Website and its partners to communicate, optimize and serve advertisements based on your past use of this Website. This activity is facilitated by tracking Usage Data and using Tracking Tools to collect information that is then transferred to partners who handle remarketing and behavioral targeting activities.

Some services offer an email list-based remarketing option.

In addition to the opt-out features offered by the services below, Users may opt-out by visiting the Network Advertising Initiative opt-out page. Users may also opt-out of certain advertising features through corresponding device configuration options, such as mobile device advertising configuration options or generic advertising configuration.

Google Ad Manager Audience Extension

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC or Google Ireland Limited, depending on where this Website is used, that tracks visitors to this Website and enables selected advertising partners to display personalized ads to them across the web.

Personal Data Processed: Usage Data; Tracking Tool.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, you may consult the section describing your rights as a California consumer for information regarding how to opt out of the sale.

Performance testing of content and functionality (A/B testing)

The services contained in this section allow the Data Controller to track and analyze the User's response, in terms of traffic or behavior, to changes in the structure, text or any other component of this Website.

Google Optimize 360

Google Optimize 360 is an A/B testing service provided by Google LLC or Google Ireland Limited, depending on where this Website is used, ("Google"). This service allows the Data Controller to target groups of Users based on their past use of this Web Site. Users who disable tracking by Google Analytics will not be included in the experiments created within Google Optimize 360. Google may use Personal Data to contextualize and personalize ads in its ad network.

Personal Data Processed: Usage Data; Tracking Tool.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing California consumer rights for information regarding how to opt-out of the sale.

Google Optimize

Google Optimize is an A/B testing service provided by Google LLC or Google Ireland Limited, depending on where this Website is used, ("Google"). Google may use Personal Data to contextualize and personalize ads in its advertising network.

Personal Data processed: Usage Data; Tracking Tool.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing California consumer rights for information regarding how to opt-out of the sale.

Statistics

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

Google Analytics (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited ("Google"). Google uses the Personal Data collected in order to track and examine the use of this Website, compile reports and share them with other services developed by Google.

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



Personal Data processed: Cookies; Usage Data.

Place of processing: Ireland - Privacy Policy - Opt Out.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing the rights of California consumers for information regarding how to opt out of the sale.

Advertising reporting functionality in Google Analytics

Google Analytics on this Website has enabled advertising report generation features, which collect additional information from the DoubleClick cookie (web activity) and device ad IDs (application activity). This allows the Controller to analyze specific Data related to Users' behaviors and interests (Traffic Data and Users' Interaction with Ads Data) and, if enabled, Demographic Data (age and gender information). Users may opt out of Google's cookies by visiting Google's [Ad Settings] (<https://adssettings.google.com/authenticated>).

Personal Data processed: unique identifiers of advertising devices (Google Advertiser ID or IDFA identifier, for example); Tracking Tool; various types of Data as specified by the service's privacy policy.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Category of personal information collected under the CCPA: identifiers; Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing California consumer rights for information regarding how to opt-out of the sale.

Google Analytics with anonymized IP

Google Analytics is a web analytics service provided by Google LLC or Google Ireland Limited, depending on where this Website is used, ("Google").

Google uses the Personal Data collected in order to track and examine the use of this Website, compile reports and share them with other services developed by Google.

Google may use Personal Data to contextualize and personalize ads in its ad network.

This Google Analytics integration anonymizes your IP address. The anonymization works by shortening the IP address of the Users within the borders of the member states of the European Union or other countries that are members of the Agreement on the European Economic Area. Only in exceptional cases, the IP address will be sent to Google's servers and shortened within the United States.

Personal Data Processed: Usage Data; Tracking Tool.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, you may consult the section describing your rights as a California consumer for information regarding how to opt out of the sale.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

This type of service may, however, collect data on web traffic related to the pages where the service is installed, even when users do not use it.

Google Site Search (Google Ireland Limited)

Google Site Search is a search engine embedding service operated by Google Ireland Limited that allows this Website to embed such content within its pages.

Personal data processed: Cookies; Usage Data.

Place of processing: Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing the rights of California consumers for information regarding how to opt-out of the sale.

Google Fonts

Google Fonts is a font style display service operated by Google LLC or Google Ireland Limited, depending on where this Website is used, which allows this Website to integrate such content within its pages.

Personal Data Processed: Usage Data; various types of Data as specified by the privacy policy of the service.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing California consumer rights for information regarding how to opt-out of the sale.



YouTube Video Widget without Cookies

YouTube is a video content display service operated by Google LLC or Google Ireland Limited, depending on where this Website is used, which enables this Website to embed such content within its pages.

This widget is set up so that YouTube does not save information and cookies about Users on this Website unless they play the video.

Personal Data Processed: Usage Data.

Place of Processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing California consumer rights for information regarding how to opt-out of the sale.

YouTube Video Widget

YouTube is a video content display service operated by Google LLC or Google Ireland Limited, depending on where this Website is used, which allows this Website to embed such content within its pages.

Personal Data Processed: Usage Data; Tracking Tool.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing California consumer rights for information regarding how to opt-out of the sale.

Google Maps Widget

Google Maps is a map display service operated by Google LLC or Google Ireland Limited, depending on where this Website is used, which allows this Website to integrate such content within its pages.

Personal Data Processed: Usage Data; Tracking Tool.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing California consumer rights for information regarding how to opt-out of the sale.

Font Awesome (Fonticons, Inc.)

Font Awesome is a font style display service operated by Fonticons, Inc. that allows this Website to integrate such content within its pages.

Personal data processed: Usage Data.

Place of processing: United States - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") under the CCPA. In addition to the information contained in this clause, the User may consult the section describing the rights of California consumers, for information regarding how to opt-out of the sale.

MORE ABOUT PERSONAL DATA

Sale of goods and services online

The Personal Data collected is used to provide services to the User or to sell products, including payment and delivery. The Personal Data collected to finalize the payment may be that of the credit card, bank account used for the transfer or other payment instruments provided. The Payment Data collected by this Website depends on the payment system used.

USER RIGHTS

Users may exercise certain rights with reference to the Data processed by the Data Controller.

In particular, the User has the right to:

- revoke consent at any time. The User may revoke the consent to the processing of its Personal Data previously expressed.
- oppose the processing of their Data. The User may object to the processing of their Data when it is done on a legal basis other than consent. Further details on the right to object are set out in the section below.
- access to your Data. The User has the right to obtain information about the Data processed by the Data Controller, certain aspects of the processing and to receive a copy of the Data processed.
- verify and request rectification. The User may verify the correctness of its own Data and request its update or correction.



- obtain the limitation of the treatment. When certain conditions are met, the User may request the limitation of the processing of its Data. In this case, the Data Controller will not process the Data for any purpose other than its preservation.
- obtain the cancellation or removal of their Personal Data. When certain conditions are met, the User may request the deletion of their Data by the Data Controller.
- receive their Data or have it transferred to another owner. The User has the right to receive his or her Data in a structured, commonly used and machine-readable format and, where technically feasible, to have it transferred without hindrance to another owner. This provision is applicable when the Data is processed by automated means and the processing is based on the User's consent, a contract to which the User is a party or contractual measures related thereto.
- propose complaint. The User may lodge a complaint with the competent data protection supervisory authority or take legal action.

Details of the right to object

When Personal Data are processed in the public interest, in the exercise of public powers vested in the Data Controller or to pursue a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons related to their particular situation.

Users should note that if their Data were processed for direct marketing purposes, they may object to the processing without providing any reasons. To find out whether the Data Controller processes data for direct marketing purposes, Users may refer to the respective sections of this document.

How to exercise rights

In order to exercise the User's rights, Users may address a request to the contact details of the Controller set out in this document. Requests are filed free of charge and processed by the Controller as soon as possible, in any case within one month.

COOKIE POLICY

This Website makes use of Tracking Tools. To learn more, the User may consult the Cookie Policy.

ADDITIONAL INFORMATION ABOUT PROCESSING

Legal defense

The User's Personal Data may be used by the Data Controller in legal proceedings or in the preparatory phases of such proceedings in order to defend against misuse of this Website or related Services by the User.

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

Specific information

At the User's request, in addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

System logs and maintenance

For purposes of operation and maintenance, this Website and any third party services used by it may collect system logs, i.e. files that record interactions and may also contain Personal Data, such as the User's IP address.

Information not contained in this policy

Further information regarding the processing of Personal Data may be requested at any time from the Data Controller using the contact details.

Response to "Do Not Track" requests

This Website does not support "Do Not Track" requests.

To find out whether any third party services used support them, the User is invited to consult their respective privacy policies.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, if possible, on this Website as well as, if technically and legally feasible, by sending a notification to Users through one of the contact details in its possession. Therefore, please consult this page frequently, referring to the date of last modification indicated at the bottom.

If the changes affect processing whose legal basis is consent, the Data Controller will collect the User's consent again, if necessary.

INFORMATION FOR CONSUMERS FROM CALIFORNIA



This portion of the document supplements and complements the information contained in the rest of the privacy policy and is provided by the company that operates this Website and, where applicable, its parent company and its subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "our" or "us").

The provisions contained in this section apply to all Users who are deemed to be consumers residing in the state of California, United States of America, under the "California Consumer Privacy Act of 2018" (such Users are referred to herein simply as "you", "your", "you" or "your"), and, for such Users, these provisions take precedence over any other possibly divergent or conflicting provisions contained in this privacy policy.

The term "personal information" as defined in the California Consumer Privacy Act (CCPA) is used in this part of the document.

Categories of Personal Information Collected, Disclosed or Sold

This section summarizes the categories of personal information we have collected, disclosed, or "sold" under the CCPA and the purposes for which we process it. You can find detailed information about these activities in the section called "Personal Information Processing Details" in this document.

Information we collect: the categories of personal information we collect

We have collected the following categories of personal information about you: identifiers, business information, and Internet information.

We will not collect additional categories of personal information without first providing you with a new disclosure.

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

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

For example, you directly provide us with your personal information when you submit requests via any form on this Web Site. In addition, you indirectly provide us with personal information when you browse this Web Site, as personal information about you is automatically observed and collected. Finally, we may collect your personal information from third parties who work with us in connection with the provision of the Service or the operation of this Web Site and its features.

How we use the information we collect: We share and disclose your personal information with third parties for operational purposes.

We may disclose your personal information to third parties for operational and service purposes. If we do so, we will enter into a written contract with that third party that obligates the recipient of your personal information to keep that information confidential and not to use it for any purpose other than necessary to carry out the contract.

We may also disclose your personal information to third parties when you request or authorize us to do so in order to provide you with our Service.

For more information about the purposes of processing, please see the relevant section of this document.

Sale of Your Personal Information

For purposes of this document, the term "sale" means "to sell, assign, release, make public, disclose, disseminate, make available, transfer, or otherwise communicate orally, in writing, or by electronic means, personal information about a consumer by one business to another business or to a third party, for a fee or other profit."

This means that, for example, a sale can occur whenever an app runs advertisements, performs statistical analysis on its traffic or views, or simply uses tools such as social network plug-ins and similar tools.

Your right to opt out of the sale of your personal information

You have the right to opt-out of the sale of your personal information. This means that whenever you ask us not to sell your information, we will carry out your request.

Such requests can be made freely, at any time, and without submitting any request subject to verification, simply by following the instructions below.

Instructions for Opting Out of the Sale of Personal Information

If you would like more information or to exercise your right to opt-out in connection with all sales made from this Website, both online and offline, you may contact us using the contact information provided herein.

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

We may use your personal information to enable the proper functioning of this Website and its features ("operational purposes"). In such cases, your personal information will be processed in a manner that is appropriate and proportionate to the purposes for which it was originally collected and strictly within the limits of compatible purposes.

We may also use your personal information for other reasons, such as for business purposes (as set forth in the "Personal Information Processing Details" section herein), as well as to comply with the law and defend our rights before competent authorities when our rights or interests are threatened or when we suffer harm.



We will not use your Personal Information for different, unrelated or incompatible purposes without first notifying you of a new disclosure.

Your privacy rights in California and how to exercise them.

Right to Know and Portability

You have the right to know the following:

- the categories of personal information we collect about you and the sources of that information, the purposes for which we use your personal information, and with whom we share it;
- if we sell or disclose personal information to third parties for operational purposes, we will provide you with two separate lists in which we disclose:
 - o for sales, the categories of personal information disclosed to each category of recipients; and
 - o for disclosures to third parties for operational purposes, the categories of personal information obtained from each category of recipients;

The above information will be limited to personal information collected or used within the last 12 months.

In the event that our response is provided electronically, the information contained therein will be "portable", i.e., delivered in a compatible format so that you can transmit the information to other entities without impediment - provided that this is technically feasible.

Right to request deletion of your personal information

You have the right to request deletion of any of your personal information, subject to exceptions provided by law (such as, without limitation, if the information is used to identify and repair errors on this Website, to detect security incidents, for purposes of protecting against fraudulent or illegal activities, to exercise certain rights, etc.).

If no statutory exception applies, we will delete your personal information following the exercise of your right and ask our suppliers to do the same.

How to exercise your rights

To exercise your rights described above, you must submit a verifiable request by contacting us using the contact information provided herein.

In order for us to respond to your request, it is necessary for us to be able to identify you. Therefore, you can only exercise the above rights by submitting a verifiable request that must:

- provide sufficient information to allow us to reasonably verify that you are the person to whom the personal information we have collected relates or an authorized representative of that person;
- describe your request in a degree of detail that is sufficient for us to understand, evaluate and properly respond to what you are asking.

We will not respond to any request unless we are able to verify your identity and, therefore, confirm that the information we hold relates to you.

If you cannot make a verifiable request yourself, you may delegate a person registered with the California Secretary of State to do so on your behalf.

If you are an adult, you may make a verifiable request on behalf of someone who falls under your parental authority.

You may submit up to 2 requests in a 12-month period.

How and how quickly we will process your request

Within 10 days we will confirm that we have received your request and provide you with information about how we will process it.

We will respond to the substance of your request within 45 days of receiving it. If we need more time, we will explain why and let you know how much time we need. In this regard, please note that it may take up to 90 days to process your request.

Our communications will cover the previous 12-month period.

If we deny your request, we will explain the reason for the denial.

We will not charge a fee to process or respond to your verifiable request unless the request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee, or deny the request. In either case, we will notify you of our decisions and explain our reasons.

INFORMATION FOR USERS RESIDING IN BRAZIL

This part of the document supplements and complements the information contained in the rest of the privacy policy and is provided by the entity that operates this Website and, where applicable, its parent company and its subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "our" or "us").

The provisions contained in this section apply to all Users who are residents of Brazil, within the meaning of the "Lei Geral de Proteção de Dados" (such Users are referred to below simply as "you", "your", "you" or "your"). For such Users, these provisions take precedence over any other possibly divergent or conflicting provisions contained in this privacy policy.

In this part of the document, the term "personal information" as defined by the Lei Geral de Proteção de Dados (LGPD) is used.



Legal basis under which we process your personal information

We process your personal information only if one of the legal bases for such processing exists. The legal bases are as follows:

- your consent to the processing activities in question;
- the fulfilment of legal obligations which we are obliged to comply with;
- the execution of rules dictated by laws or regulations or by contracts, agreements or other similar legal instruments;
- studies conducted by research organizations, preferably carried out on anonymized personal information;
- the performance of a contract and related pre-contractual obligations, if you are a party to such contract;
- the exercise of our rights in court, administrative proceedings or arbitration;
- the defense or physical safety of you or a third party;
- the protection of your health - in the context of procedures implemented by healthcare entities or professionals;
- our legitimate interests, provided that your fundamental rights and freedoms do not outweigh those interests; and
- credit protection.

To learn more about the legal bases, you may contact us at any time using the contact information provided in this document.

Categories of personal information processed

To find out what categories of personal information we process, you can refer to the "Personal Information Processing Details" section in this document.

Why we process your personal information

To know why we process your personal information, please refer to the sections "Details on the Processing of Personal Information" and "Purposes of the Processing of Data Collected" present in this document.

Your privacy rights in Brazil, how to submit a request and how we will handle it

Your rights relating to privacy in Brazil

You have the right to:

- obtain confirmation of the existence of processing activities regarding your personal information;
- Access your personal information;
- Obtain rectification of your incomplete, inaccurate or outdated personal information;
- Obtain the anonymization, blocking or deletion of unnecessary or excessive personal information, or information that is processed contrary to the provisions of the LGPD;
- obtain information regarding the possibility of giving or refusing your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- Obtain, upon your explicit request, the portability of your personal information (except for anonymized information) to other providers of products or services, provided that our trade and business secrets are safeguarded;
- obtain the deletion of personal information processed where the processing has been carried out on the basis of your consent, unless one or more of the exceptions set out in Article 16 LGPD apply;
- revoke your consent at any time;
- lodge a complaint regarding your personal information with the ANPD (National Data Protection Authority) or a consumer protection body;
- to object to processing activities in cases where such processing is not carried out in accordance with the law
- request clear and adequate information regarding the criteria and procedures used in automated decision-making; and
- request a review of decisions adversely affecting your interests made solely on the basis of automated decision-making processes of your personal information. These include decisions to profile you personally, professionally, as a consumer or creditor, or other aspects of your personality.

You will never be discriminated against, nor will you be treated unfavourably in any way as a result of exercising your rights.

How to make a request

You may submit an explicit request to exercise your rights free of charge, at any time, using the contact details provided in this document or through your legal representative.

How and in how long we will handle your request

We will make every effort to respond to your request as quickly as possible.



However, if it is impossible for us to do so, we will ensure that you are informed of the factual or legal reasons why we cannot immediately comply with or act on your request. If your personal information is not processed by us, if we are able to do so, we will tell you to whom you should address your request.

If you decide to submit a request for access or a request for confirmation of the existence of the processing of personal information, please be sure to specify whether you prefer to receive your personal information in electronic or paper format.

You should also let us know if you would like an immediate response, in which case you will receive a simplified response, or if you would like a full disclosure.

In the latter case, we will respond within 15 days from the time of your request, providing you with all the information regarding the origin of your personal information, whether or not we have any personal information about you, all the criteria used for the processing and the purposes of the processing, while safeguarding our trade and business secrets.

In the event that you decide to submit a request to rectify, erase, anonymize or block personal information, we will ensure that we immediately inform the other parties with whom we have shared your personal information of your request so that they may in turn comply with your request - unless such communication is impossible or excessively burdensome for us.

Transfer of personal information outside of Brazil where permitted by law

We may transfer your personal information outside the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between intelligence services, investigative and criminal procedure bodies, as provided for in the instruments made available by international law;
- when the transfer is necessary in order to defend your life or physical safety or that of third parties;
- when the transfer is authorized by the ANPD;
- when the transfer results from an obligation undertaken in the context of an international cooperation agreement;
- when the transfer is necessary for the exercise of a public order or for the performance of a public service;
- when the transfer is necessary for the fulfilment of a legal obligation, the execution of a contract and related pre-contractual obligations, or the normal exercise of rights in a judicial, administrative or arbitration context.

DEFINITIONS AND LEGAL REFERENCES

Personal Data (or Data)

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

Usage Data

This is the information collected automatically through this Web Site (including by third party applications integrated into this Web Site), including: IP addresses or domain names of computers used by the User who connects with this Web Site, URI (Uniform Resource Identifier) addresses, the time of the request, the method used to forward the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc..) the country of origin, the characteristics of the browser and the operating system used by the visitor, the various temporal connotations of the visit (e.g. the time spent on each page) and the details of the itinerary followed within the Application, with particular reference to the sequence of pages consulted, the parameters relating to the operating system and the User's IT environment.

User

The individual who uses this Website which, unless otherwise specified, coincides with the Interested Party.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Person Responsible)

The natural person, legal entity, public administration and any other entity that processes Personal Data on behalf of the Data Controller, as set forth in this privacy policy.

Data Controller (or Owner)

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



This Web Site (or this Application)

The hardware or software tool through which Users' Personal Data are collected and processed.

Service

The Service provided by this Website as defined in the relevant terms (if any) on this site/application.

European Union (or EU)

Unless otherwise specified, any reference to the European Union in this document shall be deemed to extend to all current member states of the European Union and the European Economic Area.

Cookies

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

Tracking Tool

Tracking Tool means any technology - e.g. cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that allows Users to be tracked, for example by collecting or storing information on the User's device.

Legal references

This privacy policy is drafted on the basis of multiple legislative orders, including Articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy policy covers this Website only (www.orizzontilakecomo.com).