



PRIVACY POLICY OF WWW.ORIZZONTILAKECOMO.COM

This Web Site collects certain Personal Data from its Users.

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

This document contains a section for Virginia (USA) 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 Web Site, either independently or through third parties, are: first name; last name; phone number; email; Cookies; Usage Data; unique device identifiers for advertising (Google Advertiser ID or IDFA identifier, for example); Universal Unique Identifier (UUID); payment information; physical address; business name; number of Users; city; device information; session statistics; latitude (of the city); longitude (of the city); browser information.

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 such data.

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 them, it may be impossible for this Web Site to provide the Service. In cases where this Web Site indicates certain Data as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or its operation.

Users in doubt about which Data are mandatory are encouraged to contact the Data Controller. The possible use of Cookies - or other tracking tools - by this Website or 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 Web Site and warrants that he or she has the right to communicate or disseminate it, releasing the Owner from any liability to third parties.

METHOD AND PLACE OF TREATMENT OF COLLECTED DATA

Treatment modalities

The Data Controller takes appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data. The processing is carried out by means of computer and/or telematic tools, 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 Web Site (administrative, sales, 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, 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 Holder's operational offices and at any other location where the parties involved in the processing are located. For more information, please contact the Data Controller.

The User's Personal Data may be transferred to a country other than the country where the User is located. To obtain more information about the location of the processing, the User may refer to the section on Personal Data processing details.

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

The User may verify whether any of the transfers just described takes place by reviewing the section of this document on details of 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

User Data is collected to enable the Data Controller to provide the Service, comply with 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, as well as for the following purposes: Contacting the User, Platform and hosting services, Displaying content from external platforms, Statistics, Advertising, Remarketing and behavioral targeting, Content and feature performance testing (A/B testing), Tag management, Landing page and invitation page management, Contact management and message sending, Payment management, and Interaction with social networks and external platforms.

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

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.

This type of treatment constitutes: a sale under the CCPA and the VCDPA

Mailing list or newsletter (this Website)

By registering for the mailing list or newsletter, the User's email address is automatically added to a list of contacts to whom email messages containing information, including information of a commercial and promotional nature, relating to this Web Site may be sent. 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.

This type of treatment constitutes: a sale under the CCPA and the VCDPA.



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: telephone number.

Category of personal information collected under the CCPA: identifiers.

This type of treatment constitutes: a sale under the CCPA and the VCDPA

Managing contacts and sending messages

These type of services enable the management of a database of email contacts, telephone contacts, or contacts of any other type used to communicate with the User.

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

Mailchimp (Intuit Inc.)

Mailchimp is an address management and email messaging service provided by Intuit Inc.

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 according to the CCPA and the VCDPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA

Payment Processing

Unless otherwise specified, this Web Site processes all payments by credit card, wire transfer or other means through external 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 Web Site is not involved in the collection and processing of such information: instead, it will only receive a notification from the payment service provider in question about the successful payment.

PayPal (Paypal)

PayPal is a payment service provided by PayPal Inc. that 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 processing: See Paypal's privacy policy - [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 direct bank transfer to the bank account indicated by this Web Site, the Owner will collect the User's payment data, i.e. the payer's bank account number, SWIFT code, Bank and the payer's name. This data will be collected and processed solely in the context of the transaction and for billing purposes only.

Personal Data Processed: last name; physical address; payment information; first name; company 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 how the Data Controller manages the processing of the Data.

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

Place of processing: Stati Uniti - [Privacy Policy](#); Irlanda - [Privacy Policy](#); Regno Unito - [Privacy Policy](#).

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

Tag Management

This type of services is functional for the centralized management of tags or scripts used on this Web Site. The use of such 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 how the Data Controller manages the processing of the Data.

Personal Data Processed: Usage Data.

Place of processing: Stati Uniti - [Privacy Policy](#); Irlanda - [Privacy Policy](#).

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

Management of landing pages and invitation pages.

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

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

Mailchimp Landing Page (Intuit Inc.).

Mailchimp Landing Page is a landing page management service provided by Intuit Inc. that allows this Web Site 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 under the CCPA and the VCDPA.

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 Web Site.

The interactions and information captured by this Web Site are in each case subject to the User's privacy settings related to each social network.

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

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

The Tweet button and Twitter social widgets are services for interaction with the social network Twitter, 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 under the CCPA and VCDPA.

Facebook / Instagram Like button and social widgets.

The Facebook / Instagram Like button and social widgets are Facebook social network interaction services provided by Meta Platforms, Inc. or Meta Platforms Ireland Limited, depending on how the Data Controller manages the processing of the Data,

Personal Data Processed: Usage Data; Tracking Tool.

Place of processing: Stati Uniti - [Privacy Policy](#); Irlanda - [Privacy Policy](#).

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

This type of processing constitutes: A sale under the CCPA and VCDPA.

Pinterest's "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 under the CCPA and the VCDPA.

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 User Data to be used for marketing communication purposes. These communications are displayed on this Web Site in the form of banners and other forms of advertising, also related 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 below may use Tracking Tools to identify the User or use the technique of behavioral retargeting, i.e. displaying advertisements tailored to the User's interests and behavior, also detected outside this Website. To get more information about this, we suggest you check the privacy policies of the respective services.

Generally, services of this type offer the possibility to disable such tracking. In addition to any opt-out feature provided by any of the services listed in this document, the User can read more about how to turn off interest-based advertisements in the appropriate section "How to turn off interest-based advertising" in this document.

Google Ad Manager

Google Ad Manager is an advertising service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data, with which the Data Controller may run advertising campaigns jointly with external advertising networks with which the Data Controller, unless otherwise specified herein, has no direct relationship.

For an understanding of Google's use of the 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 pursuant to the CCPA and the VCDPA
- a sharing pursuant to the CCPA.
- targeted advertising according to the VCDPA

Google AdSense

Google AdSense is an advertising service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data.

For an understanding of Google's use of the 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](#) - [Opt-out](#); Ireland - [Privacy Policy](#).

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

This type of processing constitutes:

- a sale pursuant to the CCPA and the VCDPA
- a sharing pursuant to the CCPA.
- targeted advertising according to the VCDPA

Google Ads Similar Audience Segments



Similar Audience Segments is a behavioral advertising and targeting service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data, which uses Google Ads Remarketing Data to show advertisements to Users with similar behaviors to other Users who are already on the remarketing list due to their previous use of this Website. Based on this Data, personalized ads will be shown to Users suggested by similar Google Ads Audience Segments.

Users who do not want to be included in Similar Audience Segments can opt-out and disable the use of Ad Tracking Tools by visiting the: [Ads Settings](#) of Google.

For an understanding of Google's use of the Data, please see [Google's Partner Policy](#).

Personal Data Processed: Usage Data; Tracking Tool.

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

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

This type of processing constitutes:

- a sale pursuant to the CCPA and the VCDPA
- a sharing pursuant to the CCPA.
- targeted advertising according to the VCDPA

In addition to the information in this clause, the User may consult the section describing California consumer rights for information regarding how to opt out of the sale.

Remarketing and behavioral targeting

These types of services allow 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 that 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 can 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 how the Data Controller manages the processing of the Data, that tracks visitors to this Website and allows selected advertising partners to show them personalized ads within the web.

For an understanding of Google's use of the Data, please see [Google's Partner Policy](#).

Personal Data Processed: Usage Data; Tracking Tool.

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

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

This type of processing constitutes:

- a sale pursuant to the CCPA and the VCDPA
- a sharing pursuant to the CCPA.
- targeted advertising according to the VCDPA

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 how the Data Controller manages the processing of the Data, ("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 experiments created within Google Optimize 360.

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 - Opt-out](#); Ireland - [Privacy Policy](#).

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



This type of processing constitutes: a sale pursuant to the CCPA and the VCDPA

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 - Opt-out](#); Ireland - [Privacy Policy](#).

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

This type of processing constitutes: a sale pursuant to the CCPA and the VCDPA

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.

Advertising report generation functionality in Google Analytics

Google Analytics on this Website has enabled advertising report generation capabilities, which collect additional information from the DoubleClick cookie (web activity) and device ad IDs (application activity). This allows the Data Controller to analyze specific Data related to Users' behaviors and interests (Traffic Data and Ad Interaction Data from Users) and, if enabled, Demographic Data (age and gender information).

Users can opt out of Google cookies by visiting Google's [Ad Settings](#).

Personal Data processed: unique device identifiers for advertising (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 under the CCPA and VCDPA.

Google Analytics with anonymized IP

Google Analytics is a web analytics service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data, ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Website, compiling reports and sharing them with other services developed by Google.

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

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

Personal Data Processed: Usage Data; Tracking Tool.

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

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

This type of processing constitutes: a sale pursuant to the CCPA and the VCDPA

Google Analytics 4

Google Analytics is a statistics service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data, ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Website, compiling reports and sharing them with other services developed by Google.

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

In Google Analytics 4, IP addresses are used at the time of collection and then deleted before the data is recorded in any data center or server. To learn more, you can consult [Google's official documentation](#).

Personal Data Processed: city; Usage Data; browser information; device information; latitude (of city); longitude (of city); number of Users; session statistics; Tracking Tools.

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

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

This type of processing constitutes: a sale pursuant to the CCPA and the VCDPA



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 Ads Conversion Tracking.

Google Ads conversion tracking is a statistics service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing, that links data from the Google Ads ad network with actions taken within this Website.

Personal Data Processed: Usage Data; Tracking Tools.

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

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

This type of processing constitutes: a sale pursuant to the CCPA and the VCDPA

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.

Displaying content from external platforms

This type of service allows users to view content hosted on external platforms directly from the pages of this Web Site and interact with them. However, this type of service may collect web traffic data related to the pages where the service is installed, even when users are not using it.

Google Programmable Search Engine (Google Ireland Limited)

Google's Programmable Search Engine is a search engine embedding service operated by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data, which allows this Web Site to embed such content within its pages.

Personal Data Processed: Cookies; 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 under the CCPA and the VCDPA.

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 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.

Personal Data Processed: Usage Data; Tracking Tools.

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

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

This type of processing constitutes: a sale pursuant to the CCPA and the VCDPA

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 (advance)

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; Universal Unique Identifier (UUID); Tracking Tools.

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

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

This type of processing constitutes: a sale pursuant to the CCPA and the VCDPA

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](#) - [Opt-out](#); Ireland - [Privacy Policy](#).



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

This type of processing constitutes: a sale pursuant to the CCPA and the VCDPA

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](#) - [Opt-out](#); Ireland - [Privacy Policy](#).

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

This type of processing constitutes: a sale pursuant to the CCPA and the VCDPA

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 pursuant to the CCPA and the VCDPA

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.

Information on how to turn off interest-based advertisements

In addition to any opt-out features provided by any of the services listed in this document, Users can read more about how to turn off interest-based advertisements in the appropriate section of the Cookie Policy.

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 respect to the Data processed by the Data Controller. In particular, Users have the right to:

- revoke consent at any time. The User may revoke the consent to the processing of its Personal Data previously expressed.
- object to the processing of their Data. The User may object to the processing of its Data when it is done on a legal basis other than consent. Further details on the right to object are provided in the section below.
- access to one's own 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 Data and request that it be updated or corrected.
- obtain restriction of processing. 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 deletion 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 Data Controller. The User has the right to receive its Data in a structured, commonly used and machine-readable format and, where technically feasible, to have it transferred unimpeded to another Data Controller. This provision is applicable when the Data are processed by automated means and the processing is based on the User's consent, on a contract to which the User is a party, or on contractual measures related thereto. propose a complaint.
- The User may propose a complaint to 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 in pursuit of 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 with 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 CALIFORNIAN CONSUMERS

This part 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").

The provisions contained in this section apply 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, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the terms "personal information" (and "sensitive 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, commercial information and internet information.

We have collected the following categories of sensitive personal information: informazioni di pagamento We will not collect additional categories of personal information without notifying you.

Your right to limit the use or disclosure of your sensitive personal information and how you can exercise it

You have the right to request that we limit the use or disclosure of your sensitive personal information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer.

We can also use your sensitive personal information to perform specific purposes set forth by the law (such as, including but not limited to, helping to ensure security and integrity; undertaking activities to verify or maintain the quality or safety of our service) and as authorized by the relevant regulations.

Outside of the aforementioned specific purposes, you have the right to freely request, at any time, that we do not use or disclose your sensitive personal information. This means that whenever you ask us to stop using your sensitive personal information, we will abide by your request and we will instruct our service providers and contractors to do the same.

To fully exercise your right to limit the use or disclosure of your sensitive personal information 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.

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

Once you have exercised this right, 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.

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 CPRA (CCPA amendment).

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 CPRA (CCPA amendment).

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 CPRA (CCPA amendment).

Please note that the exchange of personal information with a service provider pursuant to a written contract that meets the requirements set by the CPRA (CCPA amendment), 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. 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 CPRA (CCPA amendment). 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 minor 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.

INFORMATION FOR VIRGINIA CONSUMERS

This part 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").

The provisions contained in this section apply 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, these provisions supersede any other possibly divergent or conflicting provisions 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, commercial information, 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.

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

For our purposes, the word "targeted advertising" means "displaying advertisements to you where the advertisement is selected based on personal data obtained from your activities over time and across nonaffiliated websites or online applications to predict your preferences or interests" as defined by the VCDPA.

To find out more details on the processing of your personal data for targeted advertising purposes, you can read the section titled "Detailed information on the processing of Personal Data" within this document.

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.

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 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 relates 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 minor 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.

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).

Last revision: January 2023