



# PRIVACY POLICY OF WWW.ORIZZONTILAKECOMO.COM

This Web Site collects certain Personal Data from its Users.

This document contains a section devoted to U.S. consumers and their privacy rights.

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

## DATA CONTROLLER

SEIXSETTE SOCIETA' A RESPONSABILITA' LIMITATA SEMPLIFICATA

Via San Fermo 20, 23867 Suello (LC) - ITALY

VAT No. IT04094260132

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; and billing address.

Full details on each type of Personal 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 it, 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 as to which Data are mandatory are encouraged to contact the Data Controller.

Any use of Cookies - or other tracking tools - by this Web Site or the owners of third party services used by this Web Site is for the purpose of providing the Service requested by the User, in addition to the additional purposes described herein and in the Cookie Policy.

The User assumes responsibility for the Personal Data of third parties obtained, published or shared through this Web Site.

## 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.

### Place

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

For further information, please contact the Data Controller.

The User's Personal Data may be transferred to a country other than that in which the User is located. To obtain further information on the place of processing, the User may refer to the section on details of the processing of Personal Data.

### Period of retention

Unless otherwise stated in this document, Personal Data are processed and kept for the time required by the purpose for which they were collected and may be kept for a longer period due to any legal obligations or based on the consent of Users.

## 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 you, 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, Managing landing pages and invitation pages, Managing contacts and sending messages, Managing payments, Interaction with social networks and external platforms, and Creating and managing this Website.

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, consents 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; first name; phone number.

Category of personal information collected under the CCPA: identifiers.

This type of treatment constitutes:

- a Sale in California

#### 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 in the United States

#### 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 in California

### **Creation and Management of this website**

The main components of this Web Site are created and maintained directly by the Owner making use of the software mentioned below.

#### WordPress (self-hosted) (this Web Site)

This Web Site is developed and managed by the Owner using a CMS (Content Management System) software called WordPress.

Personal Data Processed: last name; email; billing address; payment information; first name; phone number.

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

### **Managing contacts and sending messages**

These types 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 email address management and messaging service provided by Intuit Inc.

Personal Data processed: last name; email address; 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 in the United States
- a Sharing in California

### **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 or other networks

This type of processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Montana

#### 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.

This type of treatment constitutes:

#### 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 or other networks.

This type of treatment constitutes:

### **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 or other networks.

This type of treatment constitutes:

### **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 in California

#### **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 Twitter widgets (X Corp.).

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 or other networks.

This type of processing constitutes:

- a Sale in California

#### 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 or other networks.

This type of processing constitutes:

- a Sale in the United States

#### 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 or other networks

This type of processing constitutes:

- a Sale in California

#### **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 or other networks

This type of processing constitutes:

- a Sale in California
- a Sharing in California

### 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](#) - [Opt Out](#).

Category of personal information collected under the CCPA: Internet information or other networks.

This type of processing constitutes:

- a Sale in California
- a Sharing in California

### 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 of the Data, which 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](#); Ireland - [Privacy Policy](#).

Category of Personal Information collected under the CCPA: information relating to activities on the internet or other networks.

This type of processing constitutes:

- a Sale in California

### 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 or other networks.

This type of processing constitutes:

- a Sale in California
- a Sharing in California



## 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 or other networks.

This type of processing constitutes:

- a Sale in California
- a Sharing in California

## Platform and hosting services

These services are designed to host and run key components of this Website, making it possible to deliver this Website from a single platform. These platforms provide the Data Controller with a wide range of tools, such as analytical tools, user registration management tools, comment and database management tools,

e-commerce tools, payment processing tools, etc. The use of these tools involves the collection and processing of Personal Data.

Some of these tools operate through servers located in different geographical locations, making it difficult to determine the exact location where Personal Data is stored. Some of these services operate through servers located in different geographical locations, making it difficult to

### WordPress.com (Automattic Inc.)

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

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

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

Category of Personal Information collected under the CCPA: information about activities on the internet or other networks.

This type of processing constitutes:

## 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 or other networks

This type of processing constitutes:

- a Sale in California



### 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 or other networks.

This type of processing constitutes:

- a Sale in California

### **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 or other networks.

This type of processing constitutes:

- a Sale in California

### 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.

For an understanding of how Google uses data, please refer to the [Google 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 or other networks.

This type of processing constitutes:

- a Sale in California

### 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](#).

For an understanding of how Google uses data, please refer to the [Google Partner Policy](#).

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 or other networks.

This type of processing constitutes:

- a Sale in California



### 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 treatment constitutes:

- a sale under the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising under the CPA, CTDPA and UCPA

### **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'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 or other networks.

This type of processing constitutes:

- a Sale in California

### 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 or other networks.

This type of processing constitutes:

- a Sale in California

### 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 or other networks.

This type of processing constitutes:

- a Sale in California

### 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 or other networks.

This type of processing constitutes:

- a Sale in California

### 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 or other networks.

This type of processing constitutes:

- a Sale in California

#### 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 or other networks.

This type of processing constitutes:

- a Sale in California

### **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.

### **COOKIE POLICY**

This Website makes use of Tracking Tools. To learn more, the User may consult the [Cookie Policy](#).

### **MORE INFORMATION FOR USERS**

#### **Legal basis for processing**

The Data Controller processes Personal Data relating to the User if one of the following conditions applies:

- the User has given consent for one or more specific purposes.
- processing is necessary for the performance of a contract with the User and/or for the implementation of pre-contractual measures;
- processing is necessary to fulfill a legal obligation to which the Data Controller is subject;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party.

It is always possible to ask the Data Controller to clarify the specific legal basis for each processing operation and, in particular, to specify whether the processing is based on law, is required by a contract or is necessary for the conclusion of a contract.

#### **Further information on storage time**

Unless otherwise specified in this document, Personal Data is processed and stored for the time required for the purpose for which it was collected and may be stored for a longer period due to any legal obligations or based on the consent of the Users.

Therefore:

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

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



At the end of the retention period, Personal Data will be deleted. Therefore, upon expiry of this term, the right of access, deletion, rectification, and the right to data portability can no longer be exercised.

## **USER RIGHTS AS PER THE GENERAL REGULATION ABOUT DATA PROTECTION (GDPR)**

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.

Users have the right to obtain information regarding the legal basis for the transfer of Data abroad including to any international organization governed by international law or formed by two or more countries, such as the UN, as well as regarding the security measures taken by the Data Controller to protect their Data.

### 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 are advised that, if their Data is processed for direct marketing purposes, they may object to the processing at any time, free of charge and without providing any justification. If Users object to processing for direct marketing purposes, their Personal Data will no longer be processed for such purposes. To find out whether the Data Controller processes Data for direct marketing purposes, Users can refer to the relevant sections of this document.

### How to exercise rights

In order to exercise their rights, Users may address a request to the contact details of the Controller indicated in this document. The request is free of charge and the Controller will respond as soon as possible, in any case within one month, providing the User with all the information required by law. Any rectification, deletion or restriction of processing will be communicated by the Controller to each of the recipients, if any, to whom the Personal Data has been transmitted, unless this proves impossible or involves a disproportionate effort. The Data Controller shall notify the User of such recipients if the User so requests.

## **FURTHER INFORMATION FOR USERS IN THE UNITED STATES**

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 information contained in this section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).


### Notice at collection

The following Notice at collection provides you with timely notice about the categories of Personal Information collected or disclosed in the past 12 months so that you can exercise meaningful control over our use of that Information.

*While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.*



- . Identifiers
- . Internet or other electronic network activity information
- . Commercial information

 You can read the definitions of these concepts inside the "[Definitions and legal references section](#)" of the privacy policy.

To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information ("Limit the Use of My Sensitive Personal Information") you can refer to the "[Your privacy rights under US state laws](#)" section of our privacy policy.

For more details on the collection of Personal Information, please read the section "[Detailed information on the processing of Personal Data](#)" of our privacy policy.

We won't process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

#### 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 Website and features thereof.

#### Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- the right to access Personal Information: the right to know. You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- the right to correct inaccurate Personal Information. You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- the right to request the deletion of your Personal Information. You have the right to request that we delete any of your Personal Information;
- the right to obtain a copy of your Personal Information. We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;
- the right to opt out from the Sale of your Personal Information; We will not discriminate against you for exercising your privacy rights.
- the right to non-discrimination.

#### Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- The right to opt out of the Sharing of your Personal Information for cross-context behavioral advertising;
- The right to request to limit our 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. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

#### Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas and Oregon, you have

- The right to opt out of the processing of your personal information for Targeted Advertising or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;
- The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information. Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

#### Additional rights for users residing in Utah

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah, you have



- The right to opt out of the processing of your Personal Information for Targeted Advertising;
- The right to opt out of the processing of your Sensitive Personal Information. Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

### **How to exercise your privacy rights under US state laws**

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 must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for 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 are an adult, you can make a request on behalf of a child under your parental authority.

#### How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on this Website. If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled global privacy control, such as for example the Global Privacy Control ("GPC"), you are free to do so and we will abide by such request in a frictionless manner.

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

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. 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 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.

## **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.

### 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.

## **DEFINITIONS AND LEGAL REFERENCES**

### Personal Data (or Data) / Personal Information (or Information)

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.

### Sensitive Personal Information

Sensitive Personal Information means any Personal Information that is not publicly available and that reveals information considered sensitive under applicable privacy laws.

### 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.

#### Sale

Sale means any exchange of Personal Information by the Owner to a third party in exchange for money or other consideration, as defined by applicable U.S. state privacy laws. Please note that the exchange of Personal Information with a service provider under a written contract that meets the requirements set forth by applicable law does not constitute a Sale of your Personal Information.

#### Sharing

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating verbally, in writing, or by electronic or other means, of a consumer's Personal Information by the company to a third party for cross-context behavioral advertising, whether in exchange for money or for other consideration, including transactions between a company and a third party relating to cross-context behavioral advertising on behalf of a company where no money is exchanged, as defined by California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set forth by California privacy laws does not constitute sharing of your Personal Information.

#### Targeted Advertising

Targeted Advertising means the display of advertisements to a consumer for which the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across non-affiliated websites or online applications to predict that consumer's preferences or interests, as defined by applicable U.S. state privacy law.

#### 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.

Unless otherwise specified, this privacy policy covers this Website only ([www.orizzontilakecomo.com](http://www.orizzontilakecomo.com)).

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