

Privacy Policy of [www.caprealestate.co.uk](http://www.caprealestate.co.uk)  
This Website collects some Personal Data from its Users.

#### Owner and Data Controller

CAP REAL ESTATE Limited  
Owner contact email: [info@caprealestate.co.uk](mailto:info@caprealestate.co.uk)

#### Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Cookies, Usage Data, email address, first name, last name, phone number, company name, address, country, ZIP/Postal code, various types of Data, city, field of activity, website, profession, province, state, gender, date of birth, Calendar permission, Contacts permission, Microphone permission, Phone permission, SMS permission, Storage permission, Reminders permission, Social media accounts permission, username, billing address and house number.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website.

Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

#### Mode and place of processing the Data

##### Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner.

The updated list of these parties may be requested from the Owner at any time.

### Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### Place

The Data is processed at the Owner’s operating offices and in any other places where the parties involved in the processing are located.

Depending on the User’s location, data transfers may involve transferring the User’s Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

### Retention time

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

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner’s legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

### The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Access to third-party accounts, Analytics, Advertising, Contacting the User, Data transfer outside the EU, Device permissions for Personal Data access, Interaction with external social networks and platforms, Managing contacts and sending messages, Managing landing and invitation pages, Platform services and hosting, Registration and authentication and Social features.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

### Device permissions for Personal Data access

Depending on the User's specific device, this Website may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document.

The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of this

### Website.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e. accessed to, modified or removed) by this Website.

### Calendar permission

Used for accessing the calendar on the User's device, including the reading, adding and removing of entries.

### Contacts permission

Used for accessing contacts and profiles on the User's device, including the changing of entries.

### Microphone permission

Used for accessing and recording microphone audio from the User's device.

### Phone permission

Used for accessing a host of typical features associated with telephony. This enables, for instance, read-only access to the “phone state”, which means it enables access to the phone number of the device, current mobile network information, or the status of any ongoing calls.

### Reminders permission

Used for accessing the Reminders app on the User’s device, including the reading, adding and removing of entries.

### SMS permission

Used for accessing features related to the User’s messaging including the sending, receiving and reading of SMS.

### Social media accounts permission

Used for accessing the User’s social media account profiles, such as Facebook and Twitter.

### Storage permission

Used for accessing shared external storage, including the reading and adding of any items.

### Detailed information on the processing of Personal Data

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

#### Access to third-party accounts

This type of service allows this Website to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.  
Twitter account access (Twitter, Inc.)

This service allows this Website to connect with the User’s account on the Twitter social network, provided by Twitter, Inc.

Personal Data collected: various types of Data as specified in the privacy policy of the service.  
Place of processing: United States – Privacy Policy. Privacy Shield participant.

#### Google Drive account access (Google Inc.)

This service allows this Website to connect with the User’s account on Google Drive, provided by Google, Inc.

Personal Data collected: various types of Data as specified in the privacy policy of the service.  
Place of processing: United States – Privacy Policy. Privacy Shield participant.  
Stripe account access (Stripe Inc)

This service allows this Website to connect with the User’s account on Stripe, provided by Stripe, Inc.  
Personal Data collected: various types of Data as specified in the privacy policy of the service.  
Place of processing: United States – Privacy Policy. Privacy Shield participant.

### Advertising

This type of service allows User Data to be utilized for advertising communication purposes displayed in the form of banners and other advertisements on this Website, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Cookies to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Website. For more information, please check the privacy policies of the relevant services.

In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the Network Advertising Initiative opt-out page.

### Direct Email Marketing (DEM) (this Website)

This Website uses the User Data to propose services and products provided by third parties or unrelated to the product or service provided by this Website.

Personal Data collected: email address.

### Google AdSense (Google Inc.)

Google AdSense is an advertising service provided by Google Inc. This service uses the "DoubleClick" Cookie, which tracks use of this Website and User behavior concerning ads, products and services offered.

Users may decide to disable all the Doubleclick Cookies by clicking on: [google.com/settings/ads/onweb/optout](https://www.google.com/settings/ads/onweb/optout).

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

### Analytics

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

#### Adobe Analytics (Adobe Systems Incorporated)

Adobe Analytics is an analytics service provided by Adobe Systems, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

#### Analytics collected directly (this Website)

This Website uses an internal analytics system that does not involve third parties.

Personal Data collected: Cookies and Usage Data.

#### Display Advertising extension for Google Analytics (Google Inc.)

Google Analytics on this Website might use Google's Interest-based advertising, 3rd-party audience data and information from the DoubleClick Cookie to extend analytics with demographics, interests and ads interaction data.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

Facebook Analytics for Apps (Facebook, Inc.)

Facebook Analytics for Apps is an analytics service provided by Facebook, Inc.

Personal Data collected: Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

Facebook Ads conversion tracking (Facebook, Inc.)

Facebook Ads conversion tracking is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on this Website.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

Go Squared (Go Squared)

Go Squared is an analytics service provided by Go Squared Ltd.

Personal Data collected: Cookies and Usage Data.

Place of processing: United Kingdom – Privacy Policy.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

LinkedIn conversion tracking (LinkedIn Corporation)

LinkedIn conversion tracking is an analytics service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on this Website.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

Wordpress Stats (Automattic Inc.)

Wordpress Stats is an analytics service provided by Automattic Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy.

### Contacting the User

Contact form (this Website)

By filling in the contact form with their Data, the User authorizes this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data collected: address, city, company name, country, email address, field of activity, first name, last name, phone number, various types of Data, website and ZIP/Postal code.

Mailing list or newsletter (this Website)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

Personal Data collected: address, city, company name, Cookies, country, date of birth, email address, first name, gender, last name, phone number, profession, province, state, Usage Data, website and ZIP/Postal code.

Phone contact (this Website)

Users that provided their phone number might be contacted for commercial or promotional purposes related to this Website, as well as for fulfilling support requests.

Personal Data collected: phone number.

Data transfer outside the EU

The Owner is allowed to transfer Personal Data collected within the EU to third countries (i.e. any country not part of the EU) only pursuant to a specific legal basis. Any such Data transfer is based on one of the legal bases described below.

Users can inquire with the Owner to learn which legal basis applies to which specific service.

Other legal basis for Data transfer abroad (this Website)

If no other legal basis applies, Personal Data shall be transferred from the EU to third countries only if at least one of the following conditions is met:

the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;

the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;

the transfer is necessary for important reasons of public interest;

the transfer is necessary for establishment, exercise or defence of legal claims;

the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent. In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Website.

Personal Data collected: various types of Data.

Data transfer to countries that guarantee European standards (this Website)

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.

The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

Personal Data collected: various types of Data.

Data transfer from the EU and/or Switzerland to the U.S based on Privacy Shield (this Website)

If this is the legal basis, the transfer of Personal Data from the EU or Switzerland to the US is carried out according to the EU - U.S. and Swiss - U.S. Privacy Shield.

In particular, Personal Data is transferred to services that self-certify under the Privacy Shield framework and therefore guarantee an adequate level of protection of such transferred Data. All services are listed within the relevant section of this document and those that adhere to Privacy Shield can be singled out by checking their privacy policy and possibly also by specifically checking for Privacy Shield adherence in the official Privacy Shield List. Privacy Shield also specifically guarantees rights to Users which can be found in its most current form on the website run by the US Department of Commerce.

Personal Data may be transferred from within the EU or Switzerland to the U.S. to services that are not, or not anymore, part of Privacy Shield, only based on other valid legal grounds. Users can ask the Owner to learn about such legal grounds.

#### Personal Data collected: various types of Data.

Data transfer abroad based on standard contractual clauses (this Website)

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to "standard contractual clauses" provided by the European Commission. This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

#### Personal Data collected: various types of Data.

Data transfer abroad based on consent (this Website)

If this is the legal basis, Personal Data of Users shall be transferred from the EU to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards.

In such cases, the Owner shall inform Users appropriately and collect their explicit consent via this Website.

#### Personal Data collected: various types of Data.

Device permissions for Personal Data access

This Website requests certain permissions from Users that allow it to access the User's device Data as described below.

Device permissions for Personal Data access (this Website)

This Website requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data collected: Calendar permission, Contacts permission, Microphone permission, Phone permission, Reminders permission, SMS permission, Social media accounts permission and Storage permission.

#### Interaction with external social networks and platforms

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

The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network.



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

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

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

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy

### Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

MailChimp (The Rocket Science Group, LLC.)

MailChimp is an email address management and message sending service provided by The Rocket Science Group, LLC.

Personal Data collected: email address.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

Constant Contact (Constant Contact, Inc.)

Constant Contact is an email address management and message sending service provided by Constant Contact, Inc.

Personal Data collected: email address.

Place of processing: United States – Privacy Policy.

VerticalResponse (VerticalResponse Inc.)

VerticalResponse is an email address management and message sending service provided by VerticalResponse Inc.

Personal Data collected: email address and Usage Data.

Place of processing: United States – Privacy Policy.

### Managing landing and invitation pages

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

#### Mailchimp Landing Page (The Rocket Science Group, LLC.)

Mailchimp Landing Page is a landing page management service provided by The Rocket Science Group, LLC., that allows this Website to collect the email addresses of Users interested in its service. Mailchimp Landing Page allows the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of the created landing pages.

Personal Data collected: address, company name, Cookies, country, date of birth, email address, first name, gender, last name, phone number, profession, Usage Data and username.

Place of processing: United States – Privacy Policy. Privacy Shield participant.

### Platform services and hosting

These services have the purpose of hosting and running key components of this Website, therefore allowing the provision of this Website from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

#### WordPress.com (Automattic Inc.)

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

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

Place of processing: United States – Privacy Policy.

### Registration and authentication

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, this Website will be able to access some Data, stored by these third-party services, for registration or identification purposes.

#### Direct registration (this Website)

The User registers by filling out the registration form and providing the Personal Data directly to this Website.

Personal Data collected: address, billing address, city, company name, country, date of birth, email address, field of activity, first name, house number, last name, phone number, profession, username, website and ZIP/Postal code.

### Social features

#### Inviting and suggesting friends (this Website)

This Website may use the Personal Data provided to allow Users to invite their friends - for example through the address book, if access has been provided - and to suggest friends or connections inside it.

Personal Data collected: various types of Data.

### Further information about Personal Data

#### Analysis and predictions based on the User's Data ("profiling")

The Owner may use the Personal and Usage Data collected through this Website to create or update User profiles. This type of Data processing allows the Owner to evaluate User choices, preferences and behaviour for the purposes outlined in the respective section of this document.

User profiles can also be created through the use of automated tools like algorithms, which can also be provided by third parties. To find out more, about the profiling activities performed, Users can check the relevant sections of this document.

The User always has a right to object to this kind of profiling activity. To find out more about the User's rights and how to exercise them, the User is invited to consult the section of this document outlining the rights of the User.

#### Personal Data collected through sources other than the User

The Owner of this Website may have legitimately collected Personal Data relating to Users without their knowledge by reusing or sourcing them from third parties on the grounds mentioned in the section specifying the legal basis of processing.

Where the Owner has collected Personal Data in such a manner, Users may find specific information regarding the source within the relevant sections of this document or by contacting the Owner.

### Automated decision-making

Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on the User, is taken solely by technological means, without any human intervention. This Website may use the User's Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. This Website adopts automated decision-making processes as far as necessary to enter into or perform a contract between User and Owner, or on the basis of the User's explicit consent, where such consent is required by the law.

Automated decisions are made by technological means – mostly based on algorithms subject to predefined criteria – which may also be provided by third parties.

The rationale behind the automated decision making is:

- to enable or otherwise improve the decision-making process;
- to grant Users fair and unbiased treatment based on consistent and uniform criteria;
- to reduce the potential harm derived from human error, personal bias and the like which may potentially lead to discrimination or imbalance in the treatment of individuals etc.;
- to reduce the risk of User's failure to meet their obligation under a contract.

To find out more about the purposes, the third-party services, if any, and any specific rationale for automated decisions used within this Website, Users can check the relevant sections in this document.

Consequences of automated decision-making processes for Users and rights of Users subjected to it

As a consequence, Users subject to such processing, are entitled to exercise specific rights aimed at preventing or otherwise limiting the potential effects of the automated decisions taken.

In particular, Users have the right to:

obtain an explanation about any decision taken as a result of automated decision-making and express their point of view regarding this decision;

challenge a decision by asking the Owner to reconsider it or take a new decision on a different basis; request and obtain from the Owner human intervention on such processing. To learn more about the User's rights and the means to exercise them, the User is invited to consult the section of this document relating to the rights of the User.

### The rights of Users

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

In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

### Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection. Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

### How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

### Cookie Policy

This Website uses Cookies. To learn more and for a detailed cookie notice, the User may consult the Cookie Policy.

### Additional information about Data collection and processing

### Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) use other Personal Data (such as the IP Address) for this purpose.

### Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

### How "Do Not Track" requests are handled

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

To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

### Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

### Definitions and legal references

#### Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### Usage Data

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

#### Data Subject

The natural person to whom the Personal Data refers.

#### Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

#### Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

#### This Website (or this Application)

The means by which the Personal Data of the User is collected and processed.

### Service

The service provided by this Website as described in the relative terms (if available) and on this site/application.

### European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### Cookies

Small sets of data stored in the User's device.

### Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

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