

# Privacy Policy

## **Data Controller**

Claudia Bondi

Address of the Owner: via Gino Capponi, 44 - 50121 Florence

For any clarification, information, exercise of the rights listed in this statement, contact the owner at the following email address: [claudia@perleeperlage.it](mailto:claudia@perleeperlage.it)

## **Definitions and legal references**

### **> Personal Data (or Data)**

It constitutes personal data any information that, directly or indirectly, also in connection with any other information, including a personal identification number, makes a physical person identified or identifiable.

### **> Usage Data**

This information is collected automatically through this Website (also from third party applications integrated into this Website), including: IP addresses or domain names of the computers used by the User that connects to this Website, the addresses in URI (Uniform Resource Identifier) notation, the time of the request, the method used in forwarding 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 (good order, 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 (for example the time spent on each page) and the details relating to the itinerary followed within the Application, with particular reference to the sequence of the pages consulted, to the parameters relating to the operating system and the IT environment of the User.

### **> User**

The individual who uses this Website that, unless otherwise specified, coincides with the interested party.

### **> Interested**

The natural person to whom the Personal Data refers.

### **> Data Processor (or Manager)**

The natural person, legal person, public administration and any other entity that processes personal data on behalf of the Owner, as set out in this privacy policy.

### **> Data Controller (or Data Controller)**

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

### **> This Website**

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

### **> Service**

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

### **> European Union (or EU)**

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

### **> Cookies**

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

## > **Legal references**

This privacy statement is drawn up on the basis of multiple legislative systems, including articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy statement applies exclusively to this Website.

## **Types of Data collected**

Among the Personal Information collected by this Website, independently or through third parties, there are: Cookies, Usage data, name, surname, email and website.

Full details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the data are collected. Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically during the use of this Website.

Unless otherwise specified, all the Data requested by this Website are mandatory. If the User refuses to communicate them, it may be impossible for this Website to provide the Service.

In cases where this Website indicates some Data as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or on its operation.

Users who have doubts about which data are mandatory, are encouraged to contact the owner.

Any use of Cookies - or other tracking tools - by this Website or by third party service providers used by this Website, unless otherwise specified, is intended to provide the Service requested by the User, in addition the additional purposes described in this document and in the Cookie Policy, if available.

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

## **Mode and place of collected data processing**

### > **Method of treatment**

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

Processing is carried out using IT and / or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other parties involved in the organization of this Website (administrative, commercial, marketing, legal, system administrators) or external subjects (as suppliers of third party technical services, postal carriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, Data Processors by the Data Controller. The updated list of the Managers can always be requested from the Data Controller.

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

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

the User has given consent for one or more specific purposes;

Note: in some jurisdictions the Owner may be authorized to process Personal Data without the User's consent or another of the legal bases specified below, as long as the User does not object ("opt-out") to this treatment. However, this is not applicable if the processing of Personal Data is regulated by European legislation regarding the protection of Personal Data; the processing is necessary for the execution of a contract with the User and / or the execution of pre-contractual measures;

the processing is necessary to fulfill a legal obligation to which the Data Controller is subject;

the processing is necessary for the performance of a task carried out in the public interest or for the exercise of public authority vested in the Holder;

the processing is necessary for the pursuit of the legitimate interest of the owner or third parties.

It is however always possible to request the Owner to clarify the concrete legal basis of each treatment and in particular to specify whether the treatment is based on the law, provided for by a contract or necessary to conclude a contract.

#### **> Place**

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

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 processing site, the User can refer to the section concerning the processing of Personal Data.

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

If one of the transfers described above takes place, the User can refer to the respective sections of this document or request information from the Data Controller by contacting him at the opening dates.

#### **> Conservation period**

The Data are processed and stored for the time required by the purposes for which they were collected.

Therefore:

Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of the contract is completed.

Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until such interest is met. The User can obtain further information regarding the legitimate interest pursued by the Owner in the relevant sections of this document or by contacting the Data Controller.

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

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

#### **Purposes of the processing of collected data**

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Analytics, Contacting the User, Commenting on contents, Displaying content from external platforms, Interaction with social networks and external platforms, Protection from SPAM, Management of User databases.

To obtain further detailed information on the purposes of the processing and on the Personal Data concretely relevant to each purpose, the User can refer to the relevant sections of this document.

#### **Details on the processing of Personal Data**

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

## **Contact the user**

### **> Contact Form (This Website)**

By filling out the contact form with their Data, the User consents to their use to respond to requests for information or any other nature indicated by the header of the form.

Personal Data collected: surname, email address and first name.

### **> Interaction with social networks and external platforms**

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

The interactions and information acquired from this Website are in any case subject to the User's privacy settings relating to any social network.

If an interaction service with social networks is installed, it is possible that, even if the Users do not use the service, the same collect traffic data relating to the pages in which it is installed.

### **> Like button and Facebook social widgets (Facebook, Inc.)**

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

Personal Data collected: Cookies and Usage Data.

Place of processing: USA - Privacy Policy.

### **> +1 button and Google+ social widgets (Google Inc.)**

The +1 button and Google+ social widgets are services for interacting with the Google+ social network, provided by Google Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: USA - Privacy Policy.

### **> LinkedIn button and social widgets (LinkedIn Corporation)**

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

Personal Data collected: Cookies and Usage Data.

Place of processing: USA - Privacy Policy.

### **> "Pin it" button and Pinterest social widgets (Pinterest)**

The "Pin it" button and Pinterest social widgets are services of interaction with the Pinterest platform, provided by Pinterest Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: USA - Privacy Policy.

### **> Tweet button and Twitter social widgets (Twitter, Inc.)**

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

Personal Data collected: Cookies and Usage Data.

Place of processing: USA - Privacy Policy.

### **> Protection from SPAM**

This type of service analyzes the traffic of this Website, potentially containing Personal Data of Users, in order to filter it from parts of traffic, messages and contents recognized as SPAM.

### **> Akismet (Automattic Inc.)**

Akismet is a SPAM protection service provided by Automattic Inc.

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

Place of processing: USA - Privacy Policy.

### **> Statistics**

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

### > **Google Analytics (Google Inc.)**

Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google uses Personal Data, collected anonymously on this site, for the purpose of evaluating the use of this Website, compiling reports and sharing them with other services developed by Google. Google may use the Personal Data, collected anonymously on this site, to contextualize and personalize the ads of its advertising network.

Personal Data collected: Cookies and Usage Data.

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

### > **Displaying content from external platforms**

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

In the event that a service of this type is installed, it is possible that, even if the Users do not use the service, the same collect traffic data relating to the pages in which it is installed.

### > **Google Fonts (Google Inc.)**

Google Fonts is a service of visualization of font styles managed by Google Inc. that allows this website to integrate such contents within its pages.

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

Place of processing: USA - Privacy Policy.

### > **Newsletter**

Within the site there may be a form to subscribe to a newsletter dedicated to all users who spontaneously want to receive email content regarding initiatives, promotions, offers, quotes, etc ..

For the provision and management of the Newsletter, the service offered by MailChimp (The Rocket Science Group, LLC, 512 Means St., Suite 404 - 30318 - Atlanta, Georgia) is used and the data collected is stored on the secure servers of the service. dispensing.

Under the privacy policy of MailChimp the data will never be used directly by MailChimp or sold to third parties. MailChimp uses properly authorized operators to maintain the service and in the exercise of said function they may have access to your data.

In any case, the guarantees provided by the MailChimp privacy policy apply.

### **User Rights**

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

In particular, the User has the right to:

withdraw consent at any time. The User can withdraw consent to the processing of their Personal Data previously expressed.

oppose the processing of your data. You may object to the processing of your data when it occurs on a legal basis other than consent. Further details on the right of opposition are indicated in the section below.

access your data. The User has the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the Data processed.

verify and request rectification. The User can verify the correctness of his Data and request its updating or correction.

obtain treatment limitation. When certain conditions are met, the User may request the limitation of the processing of their Data. In this case, the Data Controller will not process the Data for any other purpose other than their conservation.obtain the cancellation or removal of their Personal Data. When certain conditions are met, the User can request the cancellation of their Data by the Owner.

receive your data or have it transferred to another holder. The User is entitled to receive his data in a structured format, commonly used and readable by automatic device and, where technically feasible, to obtain the transfer without hindrance to another owner.

This provision is applicable when the Data are processed with automated tools and the processing is based on the User's consent, on a contract of which the User is a party or on contractual measures connected to it.

propose a complaint. The User can lodge a complaint with the competent personal data protection authority or act in court.

#### **> How to exercise the rights**

To exercise the rights of the User, Users can direct a request to the contact details of the Owner indicated in this document. The requests are deposited free of charge and processed by the Owner as soon as possible, in any case within a month.

#### **More information on treatment**

##### **> Defense in judgment**

The User's Personal Data may be used by the Owner in court or in the preparatory stages of its possible establishment for the defense against abuse of the use of this Website or the 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 the public authorities.

##### **> Specific information**

At the request of the User, 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 log and maintenance**

For needs related to operation and maintenance, this Website and any third party services used by it may collect System Logs, which are files that record the interactions and that may also contain Personal Data, such as the User IP address.

##### **> Information not contained in this policy**

Further information in relation to the processing of Personal Data may be requested at any time to 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 informing Users on this page. Please therefore consult this page regularly, referring to the date of the last modification indicated at the bottom. In case of non-acceptance of the changes made to this privacy policy, the User is required to cease using this Website and may request the Data Controller to remove his Personal Data. Unless otherwise specified, the previous privacy policy will continue to apply to Personal Data collected until then.

**Last modification: May 25th, 2018**