

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

Dear User,

using one of our websites (hereinafter referred to as "the Website"), provide our organization with various data. This policy informs you which data we collect, for which uses and how to exercise your data protection rights.

## 1 ABOUT ME

#### Luca Occelli, BSc

37a Claribel Road Oval London - SW9 6TJ - Phone. (+44) 07802 308289

## When in Italy, I'm in:

Loc. Calcinera - 12060 Farigliano (CN)

Phone. 333 987 7183

E-mail: info@lucaoccelli.com

This statement applies to websites <a href="www.lucaoccelli.com">www.lucaoccelli.com</a>; and <a href="www.lucaoccellireconnection.com">www.lucaoccellireconnection.com</a>; For any privacy-related requests, contact: <a href="mailto:privacy@lucaoccelli.com">privacy@lucaoccelli.com</a>;

## 2 WHICH DATA DO WE COLLECT

#### 2.1 Browsing

Browsing the website does not require the provision of data. However, statistical data may be collected in an anonymous and aggregated form, which we use to obtain analytical information. These data include:

- Operating system and browsers used;
- Country from which browsing takes place;
- Number of times the site was used.

These data are collected and processed automatically and remain stored on our servers for an indefinite period of time. From them it is not possible to trace back to the user.



## 2.2 Information requests (VIA CONTACT FORMS)

If you use the information request function on the site, you will provide us with personal data through the appropriate form. These data will be used for the sole purpose of responding to the request forwarded to us and will be kept for a maximum period of 5 years from the last contact.

#### 2.3 Newsletters

We will occasionally send e-mails for information and promotional purposes to customers and users who have given consent. This consent may be revoked at any time by using the link at the bottom of the messages sent by us.

In case of difficulty, it is possible to withdraw consent by contacting us on any of the channels indicated at the beginning of this document.

## 3 How we protect your data

We have taken all measures known to the state of the art to protect the data of users in our possession.

## They include:

- Regular update of software platforms;
- Activation, maintenance and updating of anti-virus and firewall systems;
- Internal policies to limit access to data only to strictly authorized persons;

Due to the nature of the Internet, it is not possible to guarantee total protection of information systems from external attacks. In this case, we are committed to:

- Promptly report to the data subjects and the data protection authority, any violation of the personal data processed.
- 2. Promptly restore the highest possible level of security and take all necessary actions to limit the damage caused by the violation;

# 4 COOKIE

#### 4.1 WHAT ARE COOKIES

Cookies are text files that allow a site to store settings on the visitor's computer. In themselves they are harmless and without them many sites could not work. Some websites, however, are making an invasive use of them for the user's privacy.

## 4.2 What cookies is this website using

This site uses **technical** and **functional** cookies. These are cookies aimed at the proper functioning of the website or its specific features. Analytical cookies are also implemented to obtain statistical data in an **anonymous and aggregated form**. These data do not allow user identification.

The site does not use cookies to create a user profile or to provide targeted advertisements.

## 4.3 WHICH 3RD-PARTY SERVICES ARE USED BY THIS WEBSITE

This website implements the following third-party services. Please refer to the links that we provide to obtain updated information on the policies of processing personal data.

Service	Links
Google Analytics	Privacy policy
Statistics in anonymous and aggregated form on browsing the website.  Provider: Google Inc. Country: Stati Uniti d'America	<u>Opt-out</u>
JetPack	Privacy policy (JetPack)
Integration of the site with the services offered by WordPress.com. Obtaining statistics in anonymous and aggregate form.  Provider: Automattic Inc. Country: Irlanda	Privacy policy (Automattic)
OneSignal	Privacy policy
Submit of push notifications to users who gave consent to receive them.  Provider: OneSignal Inc. Country: Stati Uniti d'America	
MailChimp	Privacy policy
Sending communications and updates on articles by e-mail. <b>Provider</b> : Rocket Science Group LLC <b>Country</b> : Stati Uniti d'America	

# 5 WEB HOSTING

The website is supported by a hosting service to be accessible online.

## 5.1 ABOUT HOSTING SERVICE

This site is hosted in the Web Hosting infrastructure managed by:

Proton Srl. – Informativa sulla privacy – Revisione del 29/05/2018

# —Luca Occelli—

Proton Srl - Corso Umberto I, 9 - 12060 Farigliano (CN). www.proton.it

For more details on the privacy and security policies adopted by the provider, refer to the appropriate document hosted at the address: <a href="https://www.protonweb.it/privacy/hosting">https://www.protonweb.it/privacy/hosting</a>.

# 6 What are my rights

- You can choose how to use the data you provide: you can browse the website without providing data.
- You can decide not to receive the newsletter any more: simply unsubscribe using the link at the bottom of each of our communications.
- You can decide not to complete the various contact forms. N.B: in this case it is not possible to receive a reply from Proton Srl.

In accordance with the provisions of the applicable data protection regulations, namely the European Data Protection Regulation 2016/679 (the "GDPR") and the Italian Data Protection Act no. 196/2003 and its modifications, you have the right to access and correct your data.

You also have the right to enter into directives regarding the fate of your data in case of death.

Moreover, subject to the conditions of the regulation for the exercise of your rights, you have:

- Right to be informed (art. 12 GDPR)
- Right of access (art. 15 GDPR)

You are entitled to receive a copy of your personal data being processed, to know the expected retention period of the data or, if this is not possible, the criteria used to define this period, as well as the guarantees applied.

- Data correction right (art. 16 GDPR)
- Data deletion right (right to be forgotten) (art 17 GDPR)

You can request the cancellation of your data entered on the site. Where it is not possible to provide for the cancellation for technical reasons, the data will be anonymized (returned not attributable to your identity).

- Right to limit the treatment (art. 18 GDPR)
- Right to portability (art. 20 GDPR)
   You can request a copy of the processed data in our possession.
- Right to oppose to treatment (art. 21 GDPR)

However, in accordance with Article 12.6 of the GDPR, when you exercise these rights, Proton Srl, as data controller, reserves the right to request proof of your identity. Please be aware that the data necessary to prove your identity will be deleted once we have responded to your request.

You can exercise your rights by sending me an email in Italian or in English.

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# 7 How we admit to legal requests or we avoid damage

We access, store and share information with regulatory bodies, law enforcement agencies or other entities in these cases:

- In response to a legal request if we believe in good faith that the law requires us to do so. We may also respond to legal requests if we believe in good faith that what is required by the law of the jurisdiction in question affects users who respond to that jurisdiction and that it complies with internationally recognized standards.
- If we have reason to believe that it is necessary to detect, prevent and resolve unauthorized uses of the Products, breaches of our terms or regulations or other harmful or illegal activities, to protect ourselves (including our rights, property or Products), you or others, including in investigations or regulatory requirements or to prevent imminent deaths or physical injuries. For example, if relevant, we provide information to third-party partners and we receive information from them about account reliability to prevent fraud, abuse or other malicious activity inside and outside our Products

The information we receive (including financial transaction data related to purchases made) may be consulted and stored for a prolonged period of time when they are the subject of a legal proceeding or obligation, a government investigation or investigation into possible violations of our conditions or regulations or to prevent damage. We can also keep the information in accounts disabled for at least one year in order to avoid the repetition of improper use or other violations of the conditions.

# 8 HOW WILL YOU BE INFORMED ABOUT CHANGES TO THIS STATEMENT

Since computer systems and regulations are subject to changes over time, we may need to modify this information on the processing of personal data. In this case, we will communicate it via the following channels:

- E-mail communications.
- News page of our website.
- Our social profiles.