

# PRIVACY POLICY

This Website collects some Personal Data from its Users.

Among the personal data collected, either independently or through third parties, there are: Cookies, Usage Data, E-mail, Username. Full details on each type of data collected are provided in the dedicated sections of this privacy statement.

## **I - INFORMATION ON THE PRIVACY POLICY OF THE SITE**

This section contains information relating to the management and processing methods of Arsoluta s.r.l. of the user data of [www.arsoluta.com](http://www.arsoluta.com).

This information is also valid for the purposes of art. 13 of the Legislative Decree. n. 196/2003, Code regarding the protection of personal data, and art. 13 of the EU Regulation n. 2016/679, relating to the protection of individuals with regard to the processing of personal data and the free circulation of such data, for those who interact with [www.arsoluta.com](http://www.arsoluta.com). This document can be reached at the following address: [http://www.arsoluta.com/legal/en/privacy\\_policy/beta.pdf](http://www.arsoluta.com/legal/en/privacy_policy/beta.pdf)

The purpose of this document is to provide to the users all the information about the methods, timing and nature of the information processed when connecting to the web pages of [www.arsoluta.com](http://www.arsoluta.com), according to Italian and European legislation.

## **II - GENERAL INFORMATION ON DATA PROCESSING**

### **1. Data owner or data controller**

The data controller (here understood as a natural or legal person who, individually or together with others, determines the purposes and means of processing personal data) of this website is Arsoluta s.r.l. and for any clarification or exercise of their rights, the user can contact him at the following email address: [arsoluta.official@gmail.com](mailto:arsoluta.official@gmail.com).

### **2. Data processor or data supervisor**

The data processors (here understood as natural or legal persons who process personal data on behalf of the data controller, appointed by the data controller pursuant to art.28 of EU Regulation no. 2016/679) of this website are Arsoluta srl and Mail Chimp (external data processor used for the management of newsletters).

### **3. Place of data processing**

The processing of data generated using [www.arsoluta.com](http://www.arsoluta.com) takes place at the registered office of Arsoluta s.r.l., in via delle Rose 40, Bologna, Italy.

In case of need, the data connected to the newsletter service can be processed by the data controller or individuals appointed for this purpose at the relevant office.

### **4. Third party data processing**

Since the use of third-party tracking tools on this website cannot be completely controlled by the Data owner, any specific reference to third-party tracking tools is to be considered indicative. To obtain complete information, Users are kindly invited to consult the privacy policy of the respective third-party services listed in this document.

### **III – COOKIES**

The site [www.arsoluta.com](http://www.arsoluta.com) uses cookies to make the user's browsing experience easier and more intuitive: cookies are a small set of data transferred to the user's browser from a specific server, and can only be read by it.

A cookie is not an executable code and cannot transmit viruses; cookies are collected to store some information about the user, about his preferences or the Internet access device, and are mainly used to adapt the functioning of the site to the user's expectations, offering a more personalized browsing experience and memorizing the choices made previously.

Cookies do not record any personal information and identifiable data will not be stored. If you wish, you can prevent the saving of some or all cookies. However, in this case the use of the site and the services could be compromised. To proceed without changing the options relating to cookies, simply continue browsing.

This Website also uses tracking tools managed directly by the owner and tracking tools that enable services provided by third parties (as specified below).

The following are the types of cookies that the site uses:

#### 1. Technical cookies

Technical cookies are used to facilitate navigation and access, as well as the safe and efficient use of the site by the user. They are necessary for the transmission of communications on the electronic network or for the supplier to provide the service requested.

The settings to manage or disable cookies may vary depending on the browser used. In any case, the user can manage or request the general deactivation or deletion of cookies by changing the settings of their browser. This deactivation can slow down or prevent access to some parts of the site.

The cookies inserted in the browser and retransmitted by Google Analytics or similar services, qualify as technical only if used for the purpose of optimizing the site directly by the owner of the site, who can collect information in aggregate form on the number of users and their activities on the site. Under these conditions, the same rules provided for technical cookies apply to Analytics cookies, in terms of information and consent.

From the point of view of duration, cookies can be distinguished in temporary session cookies (automatically deleted at the end of the browsing session), which are used to identify the user and therefore avoid logging in to each page visited, and the permanent ones, which remain active on the PC until upon expiration or cancellation by the user.

Session cookies may be installed in order to allow access and stay in the reserved area of the portal as an authenticated user. They are stored exclusively for the duration of the navigation, and will disappear when the browser is closed. Their use is strictly limited to the transmission of session identifiers consisting of random numbers generated by the server necessary to allow safe and efficient exploration of the site.

#### 2. Third party cookies

In relation to the origin of the cookies, the cookies can be distinguished between those sent to the browser directly from the site being visited and those of third parties sent to the computer from other sites: permanent cookies are often third-party cookies.

Their function is to identify online behaviour, understand interests and then customize advertising proposals for users, allow performance and functionality improvements, maintenance, or troubleshooting.

Third-party analytical cookies may be installed on this site. They are sent from the domains of the aforementioned third parties external to the site and are used to monitor performance and improve the usability of the site, through the anonymous collection of data.

Third-party profiling cookies are used to create profiles relating to users on [www.arsoluta.com](http://www.arsoluta.com), in order to propose advertising messages in line with the choices made by the users themselves.

The use of these cookies is governed by the rules established by the third parties themselves. Therefore, users are invited to read the privacy policies and the indication on how to manage or disable the cookies published on the related web pages.

### 3. Profiling cookies

Profiling cookies are those used to create user profiles and to send advertising messages in line with the preferences expressed by the user while surfing the net.

When using these types of cookies, the user must give explicit consent.

Article 22 of EU Regulation 2016/679 and Article 122 of the Data Protection Code will apply.

### Extended information for technical and profiling cookies

This site uses not only technical cookies but also profiling cookies from third-party companies and similar technologies, thus avoiding showing the surfer advertising that is not relevant but rather personalizing them (i.e. showing advertising in line with the interests shown while browsing also at other websites that use cookies).

This site in particular uses (or in any case reserves the right to use) third-party cookies, both for profiling and analysis purposes: Facebook Pixel, Google AdSense, Google Analytics as well as other cookies from advertising partners or advertising agencies or similar statistics tracking systems.

The acquired data are anonymous and can also be used by Facebook, Google, and / or other concessionaires as well as by the site manager. These profiling cookies (including from third parties) collect data such as age, sex, geographic origin, as well as monitor the user's online activity, in order to propose advertising in line with interests and carry out analyses regarding the audience of the site.

### Configurations for disabling cookies

The user can choose to disable the execution of cookies and, therefore, cancel the profiling activity for promotional purposes through the settings of his browser.

Here are some instructions for disabling cookies relating to the most used browsers:

- [Google Chrome](#)
- [Firefox](#)
- [Safari](#)

Users can then manage some cookies for mobile applications by deactivating them through the appropriate device settings (Users can consult the settings of their device to identify the relevant one).

The absence of disabling of cookies for this site is to be understood as consent to the use of the cookies themselves, and of the data collected by them, as specified in the paragraphs relating to technical and profiling cookies provided by third parties.

## **IV - DATA PROCESSED**

### 1. The methods of data processing

The processing is carried out using IT and / or telematic tools, with organizational methods strictly related to the purposes indicated.

Like all websites, also this site makes use of log files in which information, collected in an automated manner, is stored during user visits. Unless otherwise specified, all the data requested by Arsoluta s.r.l. are mandatory, and in case of refusal it may be impossible to provide any services. In cases where Arsoluta s.r.l. indicate some Data as optional, Users are free to refrain from communicating them without any consequence on the availability and operation of the Service. Users who have doubts about which data are mandatory are encouraged to contact the Data owner.

The information collected could include e-mail, cookies, Internet protocol (IP) address, browser type and device parameters used to connect to the site, the name of the internet service provider (ISP), the date and time of visit, the web page of origin of the visitor and exit, the data communicated during the use of the service, the billing data.

The aforementioned information are test rate in an automated form and collected in an exclusively aggregated form in order to ensure the correct functioning of the site and for security reasons, based on the legitimate interests of the owner.

For security purposes, the automatically recorded data may possibly also include personal data such as the IP address, which could be used to block harmful or criminal activities to the detriment of the site itself or other users. These data are never used for the identification or profiling of the user, but only for the purpose of protecting the site and its users, based on the legitimate interests of the Data owner.

The information that users decide to make public through the services and tools made available by the site, including personal data, address and residence, curriculum vitae and billing data, are provided knowingly and voluntarily, exempting this site from any responsibility for any related violations of the law. It is up to the user to verify that they have permission to enter personal data of third parties or content protected by national and international standards.

The Data are retained and processed exclusively for the time required by the aforementioned purposes, for which they were collected and, in any case, no more than 2 years. The data used for security purposes are kept for the time strictly necessary to achieve the previously indicated purpose. 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 this contract is completed.

When the processing is based on the User's consent, the Data Controller can keep the Personal Data longer 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 by order of an authority. At the end of the retention period, the Personal Data will be deleted.

### 2. Purpose of data processing

The User Data is collected to allow the Data owner to provide the Service, comply with legal obligations, respond to requests or executive actions, protect his rights and interests (or those of Users or third parties), identify any malicious or fraudulent activities, as well as for the following purposes:

contacting the User, Registration and authentication, Access to accounts on third party services, Statistics, Viewing content from external platforms, Managing contacts and sending messages, Managing support and contact requests, Hosting and backend infrastructure, Remarketing and behavioural targeting, Infrastructure monitoring, Payment management, User database management, Commercial affiliation, Tag management, Interaction with external social networks and platforms, Data transfer outside the EU, Interaction with live chat platforms, Interaction with data collection platforms and other third parties, Advertising, Management of web conferences and online telephony and Content and functionality performance tests (A / B testing), analysis and approval to appear on the platform.

### 3. Data provided by the user

As indicated above, the optional, explicit and voluntary sending of information such as e-mails, personal data, address and residence data, curriculum vitae and billing data on this site, as well as any other personal data entered, entails their subsequent acquisition necessary to offer the service and respond to requests.

### 4. Support in configuring your browser

The user can also manage cookies through the settings of his browser. However, deleting the cookies from the browser could remove the preferences set for the site. For further information and support, you can also visit the specific help page of the web browser you are using:

- Firefox  
<https://support.mozilla.org/en-us/kb/enable-and-disable-cookies-website-preferences>
- Safari  
<https://www.apple.com/legal/privacy/en-ww/>
- Chrome  
<https://support.google.com/accounts/answer/61416?hl=en>
- Opera  
<http://www.opera.com/help/tutorials/security/cookies/>

### 5. Social Network Plugin

This site also incorporates plugins and / or buttons for social networks, in order to allow easy sharing of content on your favorite social networks. These plugins are programmed so as not to set any cookies when accessing the page to safeguard user privacy. Please note that if the user browses while logged into the social network, this is valid as consent to the use of cookies conveyed through this site at the time of registration to the social network. The collection and use of information obtained through the plugin are governed by the respective privacy policies of the social networks, to which please refer:

- Instagram  
[https://help.instagram.com/help/instagram/1896641480634370/?locale=en\\_US&maybe\\_redirect\\_pol=true](https://help.instagram.com/help/instagram/1896641480634370/?locale=en_US&maybe_redirect_pol=true)
- YouTube  
<https://policies.google.com/privacy?hl=en>
- Facebook  
<https://www.facebook.com/help/cookies>

- **Linkedin**  
<https://www.linkedin.com/legal/cookie-policy>



## **V - USER RIGHTS**

In this section, the [www.arsoluta.com](http://www.arsoluta.com) website intends to inform the data subject (understood as an identified or identifiable person, to whom the data being processed refers) of the existence of the rights provided for by art. 13 co. 2 of the 2016/679 EU Regulation, in particular:

- right to ask the Data owner for access to personal data (Article 15 of the EU Regulation), their updating (Article 7, paragraph 3, letter a of Legislative Decree 196/2003), correction (Article 16 EU Regulation), integration (Article 7, co. 3 letter a Legislative Decree 196/2003), the limitation of the processing that concerns them (Article 18 EU Regulation) or to oppose, for legitimate reasons, their processing (Article 21 of the EU Regulation), in addition to the right to data portability (Article 20 of the EU Regulation);
- right to request cancellation (Article 17 of the EU Regulation), transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed (Article 7 co. 3, letter b of Legislative Decree 196/2003);
- the right to obtain the attestation that the updating, rectification, integration of data, cancellation, data blocking, transformation operations have been brought to the attention, also as regards their content, to those to whom the data have been communicated or widespread, except in the case in which this fulfilment proves impossible or involves the use of means manifestly disproportionate to the protected right (art. 7 co. 3, lett. c of Legislative Decree 196/2003).

Requests can be addressed to the data controller at his aforementioned e-mail address (without formalities) or using the model provided by the Data Protection Authority.

If the processing is based on art. 6, paragraph I, letter a) - express consent to use - or on art. 9, paragraph II, letter a) - express consent to the use of genetic, biometric, health-related data, revealing religious, philosophical or trade union beliefs, revealing racial or ethnic origin, political opinions -, the User has the right to withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given prior to the withdrawal.

In the event of a violation of the law, the user has the right to lodge a complaint with the Data Protection Authority, the authority responsible for monitoring processing in the Italian state.

For a more in-depth examination of the rights that compete with you, see articles 15 and ss. of EU Regulation 2016/679, together with art. 7 of Legislative Decree 196/2003.

## **VI - OBLIGATIONS OF THE DATA CONTROLLER**

The owner is required to notify the Guarantor of the personal data which he intends to proceed, if the processing concerns:

- genetic, biometric data or data indicating the geographical location of people or objects via an electronic communication network;
- data suitable for revealing the state of health and sexual life, processed for the purposes of assisted procreation, provision of health services electronically relating to databases or the supply of goods, epidemiological investigations, detection of mental, infectious and diffusive diseases, seropositivity, organ and tissue transplantation and monitoring of health costs;
- data suitable for revealing sexual life or psychic sphere, processed by associations, bodies and non-profit organizations, even if not recognized, of a political, philosophical, religious or trade union nature;
- data processed with the aid of electronic tools aimed at defining the profile or personality of the interested party or at analysing consumption habits and choices or at monitoring the use of electronic communication services with the exclusion of treatments that are technically essential to provide the services the same to users;
- sensitive data recorded in databases for the purpose of selecting personnel on behalf of third parties as well as sensitive data used for opinion polls, market research and other sample research;
- data recorded in specific databases managed with electronic tools and relating to the risk on economic solvency, the financial situation, the correct fulfilment of obligations, illegal or fraudulent behaviour.

## **VII - DATA PROTECTION SECURITY MEASURES**

This site processes user data in a lawful and correct manner, adopting appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of data. The processing is carried out using IT and / or telematic tools, with organizational methods strictly related to the purposes indicated.

In addition to the owner, in some cases, categories of employees involved in the organization of the site (administrative, marketing, commercial, legal, system administrators) or external subjects (third party technical service providers, postal couriers, hosting providers, IT companies, communication agencies) may have access to the data.

## **VIII - POSSIBLE CHANGES TO THIS DOCUMENT**

This document may be subject to changes or updates, also based on legislative changes.

In the case of significant changes and updates, specific notifications will be sent to users both on-site and via email.

In any case, the previous versions of this document will be available on this page.

This document was updated on 01.06.2022.