

REGULATORY FRAMEWORK

Legislative Decree no. 196 of 30 June 2003 (Personal Data Protection Code).
EU Regulation 2016/679 of 27 April 2016 (GDPR), which protects personal data and privacy, governing the processing and free circulation of personal data.

DATA CONTROLLER

The Data Controller is PoliHub, with legal premises in Piazza Leonardo da Vinci, 32, 20133 Milan, Italy.

DATA PROCESSING METHODS AND PURPOSES

Visiting this site may lead to us processing personal data relating to identified or identifiable persons.

Browsing data

The computer systems and software procedures used to run this website acquire personal data as part of their standard operations; the transmission of such data is an inherent feature of internet communication protocols. This information is not collected in order to associate it with identified data subjects but, because of the type of information it is, it could be elaborated and combined with data held by third parties, enabling users to be identified. This category of data includes IP addresses and/or the domain names of computers utilised by users who connect to this website, URI (Uniform Resource Identifier) addresses of requested resources, time of the request, method used to submit the request to the server, size of the file received in reply, numerical code indicating the server's response status in reply (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. These data are used only to compute anonymous statistics about the usage of the website and to check that it is working correctly, and are deleted after being elaborated. The data could be used to ascertain liability in the event of any computer crimes against this website. With the exception of this possibility, data are at present deleted on a periodical basis. The site uses technical and functionality cookies to enable it to work properly. These cookies do not gather information about the user's browsing history.

- Cookies -

This site uses cookies. Cookies are small strings of data that are stored in a temporary memory on your device. The data gathered by cookies can be used for comparisons between new and previous visitors, see how visitors browse through the site and, in general, give users a better experience when they visit the site.

Users wishing to disable cookies must change their computer settings to delete all cookies or send a warning if cookies are stored. Users who wish to proceed without changing the cookie settings can simply continue browsing

the site. Go to AboutCookies.org to find out more about cookies and how they affect your browsing experience.

The types of cookies we use

Essential cookies

As the name implies, they are essential to a website's functionality, such as accessing protected areas in the site. Necessary functions, such as filling in a form, could not work without the use of essential cookies.

Performance cookies

Performance cookies are used specifically for gathering data on how visitors browse a website, which pages of a website are visited most often, or if a webpage returns an error message. These cookies do not collect identifiable information on visitors. All the data collected through cookies are aggregated and so are anonymous. They are only used to improve the functionality of a website. By using our site, users give their consent to these cookies being stored on their device.

Functionality cookies

Functionality cookies allow websites to remember the user's site preferences and choices they make on the site, including username, language and region, and provide advanced personalised functions. These cookies can also be used to remember changes to text size, font and other parts of the webpage that can be personalised. They can be used to provide services requested by the user, such as watching a video or reading comments on a blog. Information stored by these cookies can be anonymised and cannot track the user's browsing activity on other sites. By using our site, users give their consent to these cookies being stored on their device.

COOKIE DECLARATION	COOKIE NAME	EXPIRY	TYPE	COOKIE DESCRIPTION
NECESSARY	<code>_pk_testcookie_domain</code>	1 day	HTTP	This cookie determines whether the browser accepts cookies.
NECESSARY	<code>CookieConsent</code>	1 year	HTTP	Stores the user's cookie consent state for the current domain

STATISTICS	_pk_id#	1 year	HTTP	Collects statistics on the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been read.
STATISTICS	_pk_ses#	1 day	http	Used by Piwik Analytics Platform to track page requests from the visitor during the session.

Cookies used in this site

This website uses first party and third-party cookies.

The table below gives details of the cookies currently present in our website.

- Data provided by the user voluntarily -

The information that users provide optionally, explicitly and voluntarily on registration forms and personal data collection forms will then be collected and stored by us, to enable us to provide the service requested. Specific privacy-related information will be presented or displayed on the website pages relating to the services requested.

OPTIONAL CONSENT TO PROVIDING PERSONAL DATA

Apart from what is specified in the browsing data, users are free to provide their personal data on information request forms or as part of their contact details when requesting information or communication material. If users do not give their consent, it may be impossible for us to send them the material requested.

Most cookies can be controlled by changing browser settings appropriately. However, if technical cookies are disabled totally or in part, website functionality may be impaired. In any case, should users not wish to receive any cookies on their device, whether from this website or from third party websites, they can raise their level of privacy protection by changing the privacy settings on their browser.

Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Firefox: <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>

Internet Explorer: <https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>

Edge: <https://support.microsoft.com/en-us/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd>

Opera: <https://www.allaboutcookies.org/manage-cookies/opera.html>

Safari on iPhone, iPad and iPod touch: <https://support.apple.com/en-us/HT201265>

Safari on Mac: <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>

Google Analytics functions can also be disabled selectively by installing Google's opt-out add-on. To disable Google Analytics, please go to this link: <https://tools.google.com/dlpage/gaoptout>.

RECIPIENTS OF PERSONAL DATA

Personal data can be communicated to authorised third parties for purposes strictly connected to and essential for the functionality of the service, such as managing this company's computer system or when personal data is handled by other companies in the organisation for the same purposes. Except for these cases, personal data will not be communicated or conceded to any other party, unless by agreement or authorisation of the parties involved. Therefore, personal data could be transmitted to third parties, but only and exclusively if:

- the data subject gives their explicit consent for their data to be shared;
- there is the need to share this information with third parties in order to provide the service requested;
- it is necessary in order to comply with requests from judicial or public safety authorities.

CONTACT FORMS

PRIVACY STATEMENT PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679

Pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR), we inform you that your personal data (first name, family name, email address and other personal data included in the contact form) will be processed by PoliHub S.c.a.r.l., as the Data Controller, to respond to your requests for information about the services we offer. The legal basis under Article 6(1)(b) GDPR is that the processing is necessary for the performance of a contract at the request of the data subject. After you have given your explicit and free consent, PoliHub will be able to send you periodic emails with content promoting and advertising our Company ("Newsletter"). You can withdraw

your consent at any time, and will no longer be subscribed to our Newsletter. You are free to give us your personal data. If you do not give us your email address, PoliHub will be unable to give you the information you have requested.

Your personal data will be processed by persons authorised to process data under Article 29 of the GDPR, by which we mean PoliHub's employees and/or collaborators. Your personal data can be communicated, and therefore known, to suppliers who act on our behalf to manage PoliHub's computer system. Personal data will in any case always be processed within the European Union.

Your personal data will be retained for the time necessary to address your requests, and will then be deleted. Concerning subscription to our Newsletter, PoliHub will store your personal data for as long as you are interested in subscribing to our Newsletter. We will also remind you that, where applicable, you have the right to ask PoliHub for access to personal data and to rectify or cancel them or limit the processing that concerns them or to object to their processing, as well as your right to data portability. You can contact the competent supervisory authority to exercise your privacy rights.

To exercise your rights, write to us at: PoliHub s.c.a.r.l., with legal premises in Piazza Leonardo da Vinci 32, 20133, Milan (MI), Italy, or send an email to: info@polihub.it.

LINKS TO OTHER WEBSITES

This site can contain links or references to access other websites. This company does not control the tracking technologies on other websites, to which websites this policy does not apply.

DATA RETENTION PERIOD

Personal data will be processed via digital methods within the time strictly necessary to achieve the purposes for which the data were collected. Personal information gathered for the purposes of statistical analyses are anonymised.

THE RIGHTS OF DATA SUBJECTS

Data subjects have the right to know whether or not we are holding their personal data, to know their content and origin; verify that data are correct and ask for incomplete data to be integrated or updated, or secure their deletion (Article 7 of Legislative Decree no. 196, 30 June 2003 and Articles 15 to 22 of the General Protection Regulations (EU) no. 679/2016 (GDPR). Under the same Article 7 of Legislative Decree no. 196 of 30 June 2003, and Article 15 and subsequent articles of the GDPR, the data subject has the

right to ask for the deletion, transformation into an anonymous form or the block of information handled in breach of law, and as well as to object in all cases, on legitimate grounds, to the processing of the data.

CHANGES TO CURRENT PRIVACY POLICIES

PoliHub Servizi s.c.a.r.l. verifies its policies on privacy and security periodically and, if appropriate, will review them in the light of changes to legislation, in matters of organisation or dictated by progress in technology. Whenever policies are altered, the new version will be published on the website at this page.

QUESTIONS, COMPLAINTS AND SUGGESTIONS

If you are interested in receiving more information, putting forward your suggestions, making a complaint or raising objections about the organisation's privacy policies or the way PoliHub Servizi s.c.a.r.l. processes personal data, please write to: **info@polihub.it**.