

# Privacy Policy of [www.eminds.it](http://www.eminds.it)

This Application collects some Personal Data of its Users.  
This document can be printed using the print command present in the settings of any browser.

## Data Controller

eMinds s.r.l., via Monte Sabotino, 3 - Bisceglie (BT)  
Owner contact email: [info@eminds.it](mailto:info@eminds.it)

## Types of data collected

Among the Personal Data collected by this Application, either independently or through third parties, there are: Data of use; Tracking Tool.

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 is collected.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically when using this Application.

Unless otherwise specified, all data requested by this application are mandatory. If the User refuses to communicate them, it may be impossible for this Application to provide the Service. In cases where

this Application 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 Holder.

Any use of Cookies - or other tracking tools - by this Application or by owners of third party services used by this Application, unless otherwise specified, has the purpose of provide the Service requested by the User, in addition to 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 Application and guarantees to have the right to communicate or disseminate them, freeing the Owner from any liability to third parties.

## Method and place of processing of the collected data

### Processing methods

Il Titolare adotta le opportune misure di sicurezza volte ad impedire l'accesso, la divulgazione, la modifica o la distruzione non autorizzate dei Dati Personali.

Il trattamento viene effettuato mediante strumenti informatici e/o telematici, con modalità organizzative e con logiche strettamente correlate alle finalità indicate. Oltre al Titolare, in alcuni casi, potrebbero avere accesso ai Dati altri soggetti coinvolti nell'organizzazione di questa Applicazione (personale amministrativo, commerciale, marketing, legali, amministratori di sistema) ovvero soggetti esterni (come fornitori di servizi tecnici terzi, corrieri postali, hosting provider, società informatiche, agenzie di comunicazione) nominati anche, se necessario, Responsabili del Trattamento da parte del Titolare. L'elenco aggiornato dei Responsabili potrà sempre essere richiesto al Titolare del Trattamento.

### Legal basis of the processing

The Owner processes Personal Data relating to the User if 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 such treatment. However, this is not applicable if the processing of Personal Data is regulated European legislation on the protection of Personal Data; the processing is necessary for the execution of a contract with the User and / or for the execution of measures pre-contractual; 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 of public interest or for the exercise of public authority vested in the Data Controller; the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties. However, it is always possible to ask the Data Controller 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 is processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For more information, please contact the Data Controller.

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 place of processing, the User can refer to the section relating to the details on the processing of Personal Data.

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

The User can check if one of the transfers described above takes place by examining the section of this document relating to the details on the processing of Personal Data or request information from the Data Controller by contacting him at the opening details.

## **Retention 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 this contract is completed.

Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until this interest is satisfied. 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 Owner.

When the processing is based on the User's consent, the Data Controller may 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. Therefore, at the end of this term the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

## Purpose of the processing of collected data

The User Data is collected to allow the Owner to provide the Service, comply with legal obligations, respond to requests or executive actions, protect their rights and interests (or those of Users or third parties), identify any malicious activities. or fraudulent, as well as for the following purposes: Displaying content from external platforms and Statistics.

To obtain detailed information on the purposes of the processing and on the Personal Data processed for each purpose, the User can refer to the "Details on the processing of Personal Data" section.

## Details on the processing of Personal Data

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

- **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 with anonymized IP**

Google Analytics is a web analytics service provided by Google LLC or by Google Ireland Limited, depending on the location in which this Application is accessed, ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Application, compiling reports and sharing them with other services developed by Google.

Google may use the Personal Data to contextualize and personalize the advertisements of its own advertising network.

This Google Analytics integration makes your IP address anonymous. Anonymization works by shortening the IP address of the Users within the borders of the member states of the European Union or in other countries adhering to the agreement on the European Economic Area. Only in exceptional cases, the IP address will be sent to Google's servers and shortened within the United States.

Personal Data processed: Usage data; Tracking Tool.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

### **Viewing content from external platforms**

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

This type of service may still collect data on web traffic relating to the pages where the service is installed, even when users do not use it.

### **Google Fonts**

Google Fonts is a font style visualization service managed by Google LLC or by Google Ireland Limited, depending on the location in which this application is used, which allows this application to integrate such content within its pages.

Personal Data processed: Usage data; Tracking Tool.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

# Information on how to opt out of based advertisements on interest

In addition to any opt-out function provided by any of the services listed in this document, Users may make use of information on YourOnlineChoices (EU), theNetwork Advertising Initiative (USA) and (USA), DAAC (Canada), DDAI (Japan) or other similar services. With these services it is possible to manage the tracking preferences of most advertising tools. The Owner, therefore, advises Users to use these resources in addition to the information provided in this document. AppChoices which helps Users control behavioral advertising on mobile applications.

Users can also disable certain advertising features through their device settings, such as device advertising settings for mobile phones or ad settings in general.

## User rights

Users can 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 revoke the consent to the processing of their Personal Data previously expressed.
- oppose the processing of their data. The user can oppose the processing of their data when it occurs on a legal basis other than consent. Further details on the right to object are indicated in the section below.
- access their 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 their Data and request its updating or correction.
- obtain the limitation of the treatment. 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 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 their data or have them transferred to another owner. The User has the right to receive his / her Data in a structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain its unhindered transfer to another owner. This provision is applicable when the Data is processed with automated tools and the processing is based on the User's consent, on a contract to 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 supervisory authority or take legal action.

## Details on the right to object

When Personal Data is processed in the public interest, in the exercise of public authority vested in the Owner or to pursue a legitimate interest of the Owner, Users have the right to object to the processing for reasons related to their particular situation.

Users are reminded that, if their Data are processed for direct marketing purposes, they can oppose the processing without providing any reasons. To find out if the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

## How to exercise your rights

To exercise the User's rights, Users can direct a request to the contact details of the Owner indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible, in any case within one month.

## **Further information on the treatment**

### **Defense in court**

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its eventual establishment for the defense against abuse in the use of this Application or related Services by the User. The User declares to be aware that the Owner 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 Application 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 Application and any third party services used by it may collect system logs, which are files that record the interactions and which 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 from the Data Controller using the contact details.

### **Response to "Do Not Track" requests**

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

To find out if any third-party services used support them, the User is invited to consult the respective privacy policies.

### **Changes to this privacy policy**

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, if possible, on this Application as well as, if technically and legally feasible, by sending a notification to Users through one of the extremes of contact he has. Please therefore consult this page frequently, referring to the date of the last modification indicated at the bottom.

If the changes affect treatments whose legal basis is consent, the Data Controller will collect the User's consent again, if necessary.

## **Definitions and legal references**

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

Any information that, directly or indirectly, also in connection with any other information, including a personal identification number, makes personal data

identified or identifiable natural person.

## **Usage Data**

This is information collected automatically through this Application (including from third-party applications integrated into this Application), including: IP addresses or domain names of the computers used by the User who connects with this Application, addresses in URI notation ( Uniform Resource Identifier), the time of the request, the method used to forward 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 (successful, error, etc.) country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details of the itinerary followed within the Application, with particular reference the sequence of the pages consulted, the parameters relating to the operating system and the IT environment of the User.

## **User**

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

## **Interested**

The natural person to whom the Personal Data refers.

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

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

## **Data Controller (or Owner)**

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 relating to the operation and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application.

## **This Application**

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

## **Service**

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

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

## **Cookies**

Cookies are Tracking Tools which consist of small pieces of data stored in the User's browser.

## **Tracking Tool**

By Tracking Tool we mean any technology - eg. Cookies, unique identifiers, web beacons, integrated scripts, e-tags and fingerprinting - which allow users to be tracked, for example by collecting or saving information on the User's device.

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## **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 only concerns this Application.