

## **PRIVACY AND COOKIE POLICY**

### **I – WEBSITE PRIVACY POLICY**

1. This section contains the information regarding the management of Cucicucicoo in reference to the personal information of Cucicucicoo users.
2. This policy is valid as per Sect. 13 of D.Lgs. n. 196/2003, regarding the protection of personal information, specifically the use of personal information and the disclosure thereof for users of the website Cucicucicoo found at the following home page:  
  
[www.cucicucicoo.com](http://www.cucicucicoo.com)
3. This policy is valid solely for Cucicucicoo and not for any other website linked to from Cucicucicoo and visited by the user.
4. The aim of this document is to provide indications regarding the methods, timeframe and general nature of the information that the owners are obliged to provide to users upon the opening of the website Cucicucicoo, regardless of the intentions of the user's connection, as per Italian and European legislation.
5. We reserve the right to modify, revise or otherwise amend this Privacy Policy at any time to comply with new privacy laws. It is the user's responsibility to periodically check this page for any such modification, revision, or amendment.
6. If the user is younger than 16 years of age, according to Sect. 8, c.1 EU regulation 2016/679, his or her parent or guardian must give consent to this policy.

### **II – USE OF PERSONAL INFORMATION**

#### **1 – Owner of personal information**

1. The owner of the personal information is the physical or legal person, public authority, service or other which determines the purpose and methods of personal information use. This person is also responsible for the security of these profiles.
2. The owner of the website Cucicucicoo is: Lisa Marie Neri, who can be reached at the following e-mail address for any sort of explanation or service regarding the user's rights: [lisa@cucicucicoo.com](mailto:lisa@cucicucicoo.com).

#### **2 – Person responsible for use of personal information**

1. The person responsible for the use of personal information is the physical or legal person, public authority, service or other which uses personal information on behalf of the owner.
2. As per Sect. 28 of EU regulation n. 2016/679, as delegated by the owner of the user information, the person responsible for the use of personal information of the website Cucicucicoo is: Lisa Marie Neri.

### **3 – Location of personal information use**

1. The use of personal information generated through the use of Cucicucicoo takes place at Via de Blasio, Marigliano (Italy).
2. If necessary, the personal information regarding newsletter services can be used by the person responsible for personal information or persons delegated by this person for the same purpose in the same location.

## **III - COOKIES**

### **1 – Type of Cookies**

1. The website Cucicucicoo uses cookies in order to make the user's experience easier. Cookies are small text files used to store some information which can regard the user, his/her preferences or the type of device used to access Internet (computer, tablet or smartphone) and are mainly used to adapt the website's functioning to the user, offering a more personalized browsing experience and memorizing previous actions.
2. A cookie consists of a small bit of information transferred to the user's browser by a web server and can be viewed only by the server which carried out this transfer. These files contain neither viruses nor spyware.
3. These cookies do not save any personal information and any possible recognizable information will not be saved. If the user wishes, it is possible to block any or all cookies. However, in this case, the user may be prevented from taking full advantage of the website. If the user wishes to proceed without modifying the cookie options, all he/she needs to do is continue browsing normally.

This website uses the following types of cookies:

### **2 – Technical Cookies**

1. There are various technologies used to save information on the user's computer, which can then be gathered by websites. Among the most well-known and widely-used are HTML cookies. These are used for browsing and aiding in the access and use of websites for the

user. They are necessary for the transmission of communications on the web, or rather to the service provider, to provide the service desired by the client.

2. The settings for managing or deactivating cookies can vary according to the internet browser used. In any case, the user can manage or request that the cookies be blocked or deleted by modifying the settings in the internet browser used. In blocking cookies, some parts of the website may become slowed down or inaccessible.

3. The use of technical cookies allows for the secure and efficient usage of the website.

4. The cookies that are inserted in the browser and retransmitted via Google Analytics or any other service providing website statistics are technical solely if used for optimizing the web experience by the website owner him/herself, who can collect aggregate information regarding the number of users and how they visit the website. The rules regarding transparency and consent for analytics cookies are the same as those for technical cookies.

5. As concerns the duration, there are temporary session cookies which are automatically deleted at the end of each browsing session and are used for identifying the user and therefore avoiding logging in for every page viewed, as well as permanent cookies which remain active in the computer until they expire or are cancelled by the user.

6. Session cookies may be installed in order to consent access and to remain logged into areas of the website requiring authentication.

7. These session cookies will not be saved beyond the period of navigation until the browser is closed and will be removed upon closing the browser. Their use is strictly limited to the transmission of session identifiers made up of random numbers generated by the server to allow for safe and efficient use of the website.

### **3 – Third-party Cookies**

1. As regards the source, there are cookies sent to the browser directly from the website being visited, as well as those of third parties sent to the computer by other websites and not by the one being visited.

2. The permanent cookies are often Third-party cookies.

3. Most Third-party cookies are tracking cookies used to identify the user's online use, understand his/her interests, and therefore customize advertising.

4. Third-party analytical cookies may be installed. These are sent by third-party domains outside of the visited website.

5. Third-party analytical cookies are used to identify information regarding the user's behavior on Cucicucicoo. The collection of this data takes place anonymously so as to monitor the website's performance and improve its usability. Third-party profiling cookies are used to create user profiles so as to propose advertising messages consistent with the user's browsing choices.

6. The use of these cookies is regulated by rules set by the third parties themselves, therefore, users must ask, if so desired, to view third parties' privacy policies and indications on managing and/or blocking cookies on their own websites.

#### **4 – Profiling Cookies**

1. Profiling cookies create user profiles and are used to send ad messages consistent with the preferences that the user has shown during his/her website browsing.
2. The user must give explicit consent in order for these cookies to be used.
3. Sect. 22 of EU Regulation 2016/679 and article 122 of the user information protection Code will be applied.

### **IV – PERSONAL INFORMATION USED**

#### **1 – Usage of personal information**

1. This website, as all other websites, uses log files which save information gathered automatically during the user's sessions. This information could be any of the following:
  - internet protocol address (IP);
  - type of browser and device used to connect to the website;
  - name of the internet service provider (ISP);
  - date and time of session;
  - referring web page (referral) and following web page;
  - number of clicks.
2. The above-mentioned information is used automatically and gathered aggregately so as to confirm correct website functioning and for security reasons. This information will be used in terms of the owner's legitimate interest.
3. For the purposes of security (antispam filters, firewalls, detected viruses), the saved user information may automatically also include personal information such as IP address, which could be used, in accordance with applicable laws, in order to block attempts to damage the website or to other users of the website, or any other damaging activity or misdemeanors. This information will never be used to identify or profile the user, but solely to protect the website and its users, it will be used in terms of the owner's legitimate interest.
4. If website allows comments, or if the user requests specific services, including the possibility of sending a resume or Curriculum Vitae for a potential professional collaboration, the website automatically detects and saves some identifying user information, including e-mail address. This information is to be considered voluntarily provided by the user him/herself at the moment of the request. By inserting a comment or other information, the user explicitly accepts the privacy policy and, in particular, consents to his/her inserted

information being shared even with third parties. The information given will be used exclusively for the service requested and only for the time necessary for this service to be provided.

5. The information that the website users choose to make public through the services and tools provided are willingly and voluntarily provided by the user, exempting the website Cucucucicoo from any and all responsibility for any potential violations of the law. It is the user's responsibility to confirm whether or not he/she has the permission to insert personal information or third parties or any content protected by national and international regulations.

## **2 –Uses of stored personal information**

1. The personal information saved are to be utilized for the afore-mentioned uses as well as the following uses:

- Marketing, analytics and advertising;
- Fulfilling the purchase of products and services;
- Sending newsletters to those who request subscription;
- Responding to comments on the website.

2. Personal information will be stored for the length of time necessary to fulfill the above-mentioned uses and for no longer than 5 years.

3. Personal information used for security reasons (blocking attempts to damage the website) are stored for the length of time necessary to fulfill the above-mentioned use.

## **3 – Information provided by the user**

1. As indicated above, the optional, explicit and voluntary sending of e-mail to the addresses indicated on this website implies the acquisition of the sender's e-mail address, necessary in order to respond to his/her requests, as well as the acquisition of any other personal information included in the message.

2. Specific summary documents will be made available on the pages of the website for specific requested services.

## **4 – Assistance in browser configuration**

1. The user may manage cookies through his/her browser's settings. However, deleting cookies from the browser could remove preferences chosen for the website.

2. For additional information and assistance, the user can visit the help page of the web browser, some of which are:

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

## **V. USER'S RIGHTS**

1. Sect. 13, c. 2 of EU regulation 2016/679 lists user rights.
2. The website Cucicucicoo informs users of the existence of:
  - the right to request the owner for access to his/her personal information (Sect. 15 EU regulation), to update it (Sect. 7, co. 3, lett. a) D.Lgs. 196/2003), to modify it (Sect. 16 EU regulation), to integrate it (Sect. 7, co. 3, lett. a) D.Lgs. 196/2003) or to limit the usage of it (Sect. 18 EU regulation), or to oppose its use (Sect. 21 EU regulation) or request a copy of the information (Sect. 20 EU regulation);
  - the right to request the elimination of personal information (Sect. 17 EU regulation), that it be anonymous, or that it be blocked in case of violation of law, including that which need not be stored for the uses the it had been saved or used for (Sect. 7, co. 3, lett. b) D.Lgs. 196/2003);
  - the right to obtain proof that the updating, modification, integration, elimination, blocking or transformation of personal information has been carried out, as well as their content and those to whom the information has been disclosed, except in the case in which the compliance is impossible or requires the use of means manifestly disproportionate to the right defended (Sect. 7, co. 3, lett. c) D.Lgs. 196/2003);
3. Such requests may be sent to the owner by sending an e-mail to the address:  
lisa@cucicucicoo.com
4. If the use is based on Sect. 6, paragraph 1, lett. a) – consent declared for use – or on Sect. 9, paragraph 2 lett. a) – consent declared for the use of genetic, biometric, health, religious, philosophical, union, racial, ethnic or political information – the user has the right to revoke consent in any moment without compromising the legitimacy of the use based on consent prior to the revocation.

5. Likewise, in the case of violation of the regulation, the user has the right to file a complain with the Data Protection Authorities (*Garante per la Protezione dei Dati Personali*), which is in charge with the control over information use in the country of Italy.

6. For a more detailed discussion of the user's rights, please see the Sect.s 15 and et seq. Of the EU regulation 2016/679 and Sect. 7 of D.Lgs. 196/2003.

## **VI – TRANSFER OF INFORMATION TO NON-EU COUNTRIES**

1. This website could share some of the information gathered with services located outside of the European Union, such as Google, Facebook and Microsoft (LinkedIn), through social plugins and Google Analytics. This transfer is authorized and strictly regulated in Sect. 45, clause 1 of the EU Regulation 2016/679, therefore no further consent is required. The aforementioned companies guarantee protection through Privacy Shield.

2. Personal information will never be transferred to other countries that fail to respect the conditions of Sect. 45 et seq. of the EU Regulation.

## **VII. SECURITY OF THE INFORMATION PROVIDED**

1. This website uses personal information in a legitimate way, implementing security measures intended to block unauthorized access to and disclosure, modification or destruction of personal information. It is used with computer and/or online tools so as to obtain the afore-mentioned objectives.

2. In some cases, in addition to the owner, other persons involved in the organization of the website (for administrative, commercial, marketing, legal or technical aspects) or other external persons (such as technical service providers, postal services, hosting providers, communication agencies) could have access to some personal information.

## **VIII. MODIFICATIONS TO THIS DOCUMENT**

1. This document, published at the web address:

[www.cucicucicoo.com/privacy/](http://www.cucicucicoo.com/privacy/)

constitutes the privacy policy of this website.

2. It may be subject to modifications or updates. It is the user's responsibility to periodically check this page to always be up to date on new laws.

3. Previous versions of this document will continue to be available at this page.

4. This document was updated on May 23, 2018 in conformation to applicable laws, in particular EU Regulation 2016/679.