### **PRIVACY POLICY**

### 1. Information about the privacy of the site

- 2. This section contains information on how to manage the www.123hobit.com website, owned by Philippe Romang, with regard to the processing of data of users of the site.
- 3. This information is also valid for the purposes of Article 13 of Regulation (EU) No 2016/679, on the protection of individuals with regard to the processing of personal data, as well as the free movement of such data. Â for subjects that interact with www.123hobit.com.
- 4. The information is provided only for www.123hobit.com and not for other websites that may be accessed by the user through links contained therein.
- 5. The purpose of this document is to provide information about the methods, timing and nature of the information that the data controllers must provide to users when connecting to the web pages www.123hobit.com, regardless of the purpose of the link, according to Italian and European legislation.
- 6. The policy may be changed due to the introduction of new rules in this regard; therefore, please check this page periodically.
- 7. If the user is less than fourteen years old, pursuant to art. 8, c.1 Regulation (EU) 2016/679, must legitimize his consent through the authorization of the parents or those who act on their behalf.

#### 2. Data Controller

- 1. The data controller is the natural or legal person, the public authority, the service or other body that, individually and together with others, determines the purposes and means of the processing of personal data. He also handles security profiles.
- 2. With regard to this website, the data controller is Mr. Philippe Romang, and for any clarification or exercise of your rights you can contact him at the following email address: 123hobit@bluewin.ch

# 3. Place of data processing

- 1. The data processing generated by the use of www.123hobit.com takes place at via AL PAES, 88 ZONA Industriale 3, CH 6572 QUARTINO
- 2. In case of need, the data connected to the newsletter service may be processed by the data controller or subjects appointed by him for this purpose at the relevant office.

# 4. Legal basis for processing

- 1. The processing of personal data by www.123hobit.com is based on consent pursuant to art. 6, par. 1, lett. A) of the EU Regulation 2016/679 expressed by the user by browsing this website and consulting it, thus accepting this legislation.
- 2. The consent is optional and can be revoked at any time by request sent by mail to 123hobit@bluewin.ch specifying that, in this case, in the absence of consent some services may not be provided and navigation on the website may be compromised.

### 5. Cookies

1. This section describes how this Site and third parties use cookies and similar technologies. The use of cookies takes place in compliance with the relevant European legislation (Directive 2009/136/EC amended Directive 2002/58/EC "E Privacy) and national (For Italy, the guarantee measure for the protection of personal data of 8 May 2014 and subsequent clarifications as well as cookie guidelines and other tracking tools of 10 June 2021 n.231).

# 6. Type of data processing

- 1. The processing of personal data is necessary for the pursuit of the legitimate interest of the data controller for the purpose of providing information about the activity of the website www.123hobit.com pursuant to art. 6 par. 1. Lett. F) of EU Regulation 2016/679, in compliance with the provisions of the same Regulation.
- 2. This website makes use of Log Files in which information collected in an automated manner during user visits is stored. The information collected could be as follows:
- Internet protocol (IP) address;
- Type of browser and parameters of the device used to connect to the site;
- Name of the internet service provider (ISP);
- Date and time of visit;
- Visitor origin (refferal) and exit web pages;
- Possibly the number of clicks.
- 3. The above information is processed in automated form and collected in an exclusively aggregated form in order to verify the proper functioning of the site, and for security reasons. This information will be processed according to the legitimate interests of the data controller.
- 4. For security purposes (spam filters, firewalls, virus detection), the automatically recorded data may also include personal data such as the ip address, which could be used, in accordance with applicable laws, in order to block attempts to damage the site itself or to cause harm to other users, or otherwise harmful activities or constitute a crime. Such data are never used for the identification or profiling of the user, but only for the protection of the site and its users; this information will be processed according to the legitimate interests of the owner.

# 7. Data provided by the user

- 1. If the site allows the inclusion of comments, or in case of specific services requested by the user, including the possibility of sending the Curriculum Vitae for a possible working relationship, The site automatically detects and records certain user identification data, including the email address. This data is voluntarily provided by the user at the time of the request to provide the service.
- 2. By entering a comment or other information, the user expressly accepts the privacy policy. The data received will be used exclusively for the provision of the requested service and only for the time necessary for the provision of the service.
- 3. The information that users of the site will consider to make public through the services and tools made available to them, are provided by the user knowingly and voluntarily, exempting this site from any liability for any violations of laws. It is up to the user to verify that they have the permission to enter personal data of third parties or content protected by national and international rules.
- 4. The optional, explicit and voluntary sending of e-mail to the addresses indicated on this site involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the letter.
- 5. Specific summary information will be progressively reported or displayed in the pages of the site prepared for particular services on request.
- 6. The data provided voluntarily by the user (since he also clicks the "confirm" button to have accepted the privacy of the site) from the contact form on the site are exclusively the following:
- first and last name of the user;
- user's email address;
- user's website (if provided/available) is optional;
- the object of the contact desired by the user;
- message concerning the reason for the contact requested by the customer.

This data is provided by the user voluntarily, as it is necessary in order to be able to give an answer. Such data will be processed exclusively for the purpose of providing answers to the questions posed by the user and will not be transferred in any way to third parties. In any case, the retention period of the data provided by the contact form will not exceed 2 years.

# 8. Purpose of data processing

1. The data collected by the site during its operation are used exclusively for the purposes indicated above and stored for the time strictly necessary to carry out the activities specified, and in any case not more than 2 years.

#### 9. Data retention

- 1. In accordance with art. 5.1 (c) of the Regulation, the information systems and computer programs used by the website www.123hobit.com are configured in such a way as to minimize the use of personal and identifying data; these data will be processed only to the extent necessary to achieve the purposes indicated in this Policy.
- 2. The data will be kept for the period strictly necessary to achieve the specific purposes pursued and, in any case, the criterion used to determine the retention period shall be based on compliance with the terms permitted by applicable laws and the principles of minimisation of processing and limitation of storage.
- 3. Specifically, the data will be stored for the following periods:
- for all data types: 2 years.
- 4. The data used for security purposes (blocking attempts to damage the site) are kept for the time strictly necessary to achieve the purpose indicated above.

### 10. User's rights

- 1. You are guaranteed to respect your rights in the field of personal data protection. In line with the provisions of the GDPR, in relation to the processing of personal data, the user has the right to ask the Data Controller:
- access: the user can ask for confirmation that there is or is not a processing of data concerning him, in addition to more clarification about the information referred to in this policy;
- rectification: may require rectification or supplement of the data supplied, where incorrect or incomplete;
- cancellation: you can request that your data be deleted, if they are no longer necessary for our purposes, in case of withdrawal of consent or opposition to processing, in case of unlawful treatment, or there is a legal obligation to cancel or refer to persons under the age of 14;
- limitation: you may request that your data be processed only for the purpose of storage, with exclusions of other processing, for the period necessary for the rectification of your data, in case of unlawful processing for which you oppose deletion, if you have to exercise your rights in court and the data stored by the Data Controller may be useful to you and, finally, in the event of opposition to the processing and has undergone a check on the prevalence of legitimate reasons of the Data Controller compared to yours;
- opposition: you can object at any time to the processing of your data, unless there are legitimate reasons of the Data Controller to proceed with the processing that prevail over yours, for example for the exercise or its defense in court;
- portability: you can ask to receive your data, or have them transmitted to another data controller indicated by you, in a structured, commonly used and machine-readable format;

- revocation: you can revoke your consent to the use of cookies (Cookie Policy) at any time, since in this case it is the basis of the processing. The withdrawal of consent, however, does not affect the lawfulness of the processing based on the consent made before the revocation itself.
- 2. You may at any time request to exercise these rights to www.123hobit.com by contacting: 123hobit@bluewin.ch
- 3. Furthermore, the user has the right to lodge a complaint against the Italian Supervisory Authority: "Garante per la Protezione dei Dati Personali" if you believe that your rights have been violated by www.123hobit.com or if you do not find the response of www.123hobit.com to your requests satisfactory.

#### 11. Transfer to non-EU countries

- 1. 1. This website may share some of the data collected with services located outside the European Union. In particular with Google, Facebook and Microsoft (Linkedin) through social plugins and the Google Analytics service. The transfer is authorised and strictly regulated by Article 45, paragraph 1 of Regulation (EU) 2016/679, so no further consent is required.
- 2. Data will never be transferred to third countries that do not comply with the conditions laid down in Article 45 and s.s. of the Regulation (EU).
- 12. Amendments to this document
- 1. This document, which constitutes the privacy policy of this site, is published at:

www.123hobit.com/privacy

- 2. It may be subject to change or update. Users are invited to periodically consult this page to be updated on the latest legislative news.
- 3. Previous versions of the document will still be available on this page.
- 4. The document was updated on 13/06/2022 to comply with the relevant regulatory provisions, and in particular in accordance with Regulation (EU) 2016/679.