# **Ludistar Privacy Policy**

For information about your personal data collected, the purposes and the subjects with whom the data are shared, contact the Data Controller.

# **Data Controller**

Ludistar s.r.l. Owner's email address: ludi-star@casellapec.com

# **Types of Data collected**

The Owner does not provide a list of types of Personal Data collected.

Complete details on each type of Personal 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 is 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 its operation.

Users who have doubts about which Data is mandatory are encouraged to contact the Owner. Any use of Cookies - or other tracking tools - by this Application or by the owners of third-party services used by this Application has the purpose of providing the Service requested by the User, in addition to the further purposes described in this document and in the Cookie Policy. The User assumes responsibility for the Personal Data of third parties obtained, published or

shared through this Application.

# Method and place of processing of the collected data

# Treatment methods

The Data Controller adopts appropriate security measures aimed at preventing unauthorized access, disclosure, modification or destruction of Personal Data.

The processing is carried out using IT and/or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Owner, in some cases, other parties involved in the organization of this Application (administrative, commercial, marketing, legal, system administrators) or external parties (such as third-party technical service providers, postal couriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, as Data Processors by the Data Controller. The updated list of Managers can always be requested from the Data Controller.

# Place

The Data is processed at the Owner's operational offices and in any other place where the parties involved in the processing are located. For further information, contact the Owner.

The User's Personal Data may be transferred to a country other than the one 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.

# **Retention period**

Unless otherwise indicated in this document, Personal Data is processed and stored for the time required by the purpose for which it was collected and may be stored for a longer period due to any legal obligations or based on the consent of the Users.

# **Cookie Policy**

This Application uses Tracking Tools. To find out more, Users can consult the Cookie Policy.

# Further information for users

## Legal basis of the processing

The Data Controller 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.

• the processing is necessary for the execution of a contract with the User and/or the execution of pre-contractual measures;

• the processing is necessary to fulfill a legal obligation to which the Data Controller is subject;

• the processing is necessary for the execution of a task of public interest or for the exercise of public powers vested in the Data Controller;

• the processing is necessary for the pursuit of the legitimate interest of the Owner or third parties.

However, it is always possible to request the Data Controller to clarify the concrete legal basis of each processing and in particular to specify whether the processing is based on the law, provided for by a contract or necessary to conclude a contract.

## Learn more about storage time

Unless otherwise indicated in this document, Personal Data is processed and stored for the time required by the purpose for which it was collected and may be stored for a longer period due to any legal obligations or based on the consent of the Users.

Therefore:

• The data

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 attributable to the legitimate interest of the Owner will be retained until such 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 retain the Personal Data for longer until such consent is revoked. Furthermore, the Owner may be obliged to retain Personal Data for a longer period to comply with a legal obligation or by order of an authority.

At the end of the retention period, the Personal Data will be deleted. Therefore, upon expiry of this deadline the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

# User rights under the General Data Protection Regulation (GDPR)

Users can exercise certain rights with reference to the Data processed by the Owner. In particular, within the limits established by law, the User has the right to:

• revoke consent at any time. The User may revoke the previously expressed consent to the processing of their Personal Data.

• object to the processing of their Data. The User can object to the processing of their Data when it takes place by virtue of a legal basis other than consent.

• access their Data. The User has the right to obtain information on the Data processed by the Owner, 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 treatment. The User may request the limitation of the processing of their Data. In this case the Owner will not process the Data for any purpose other than their conservation.

• obtain the cancellation or removal of your Personal Data. The User may request the deletion of their Data by the Owner.

• receive your Data or have it transferred to another owner. The User has the right to receive their Data in a structured, commonly used and machine-readable format and, where technically feasible, to obtain its transfer without obstacles to another owner.

• **lodge a complaint**. The User can lodge a complaint with the competent personal data protection supervisory authority or take legal action.

Users have the right to obtain information regarding the legal basis for the transfer of Data abroad including to any international organization regulated by international law or constituted by two or more countries, such as the UN, as well as regarding the measures of security adopted by the Owner to protect their Data.

## Details on the right to object

When Personal Data is processed in the public interest, in the exercise of public powers 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 is processed for direct marketing purposes, they can object to the processing at any time, free of charge and without providing any reason. If Users object to processing for direct marketing purposes, the Personal Data will no longer be processed for these purposes. To find out whether the Owner processes Data for direct marketing purposes, Users can refer to the respective sections of this document.

## How to exercise your rights

To exercise their rights, Users can direct a request to the Owner's contact details indicated in this document. The request is free and the Owner will respond as quickly as possible, in any case within one month, providing the User with all the information required by law. Any rectifications, cancellations or limitations of processing will be communicated by the Data Controller to each of the recipients, if any, to whom the Personal Data has been transmitted, unless this proves impossible or involves a disproportionate effort. The Owner communicates these recipients to the User if he requests it.

# Learn more about the treatment

## Defense in court

The User's Personal Data may be used by the Owner in court or in the preparatory stages of its possible 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 and the Owner may be obliged to disclose the Data by order of public authorities.

## **Specific information**

Upon 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 logs and maintenance

For needs related to operation and maintenance, this Application and any third-party services used by it may collect system logs, i.e. files that record 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.

## 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 contact details contact he has. Please therefore consult this page frequently, referring to the date of last modification indicated at the bottom.

If the changes affect processing whose legal basis is consent, the Owner will collect the User's consent again, if necessary.

# **Definitions and legal references**

# Personal Data (or Data)

Any information which, directly or indirectly, also in connection with any other information, including a personal identification number, makes a natural person identified or identifiable constitutes personal data.

## Usage Data

This is the information collected automatically through this Application (also by 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.) the 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 relating to the itinerary followed within the Application, with particular reference the sequence of pages consulted, the parameters relating to the operating system and the User's IT environment.

## User

The individual who uses this Application who, unless otherwise specified, coincides with the interested party.

## Interested

The natural person to whom the Personal Data refers.

# Data Controller (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 Data Controller)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data and the tools adopted, including 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 is collected and processed.

# Service

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

# European Union (or EU)

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

# Legal references

Unless otherwise specified, this privacy policy applies exclusively to this Application.