



Profilio Company srl  
p.iva|vat 02459290223  
via sommarive 18,  
38123, Trento, Italy  
info@profilio.co

## Cookie Policy

Profilio Company's website "<https://profilio.co>" ("the website" henceforth) uses cookies to allow you to visit it without any restriction. Indeed, they have the aim to improve the functioning of the website and browsing. The following policy will provide you information about the current types of cookies used by this website, specifying the way to change your computer's personal settings.

Cookies are small text files, which are stored automatically from a browser into the visitor's computer memory, based on user's preferences. There are different types of cookies, which are characterised by different functions and durations:

- First-party cookies are created by the website that you are visiting
- Third-party cookies are made by domains from external websites and they are organised and stored by the owner of the third website. This website uses both first and third party cookies. The manager of this website does not check third-party cookies; it is necessary to refer to the policy of each third party's website:  
Google (gstatic.com): <http://www.google.com/intl/it/policies/privacy/>  
W3schools: [https://www.w3schools.com/about/about\\_privacy.asp](https://www.w3schools.com/about/about_privacy.asp).
- Session cookies (or temporary cookies) appoint to the computer of the users, who are connected to the website, a univocal number of identification, which is randomly created and they are erased when the browser is closed.
- Persistent cookies allow keeping the information between an access to the website and another. In this way, the website can recognise if it is the first visit of the page or if the user has already visited it earlier. The duration of these cookies can change from few minutes to more years. This website uses both types of cookies.
- Technical cookies are necessary to allow the correct running and navigation of the website. Without cookies, some operations could not be done or they would be more complicated and/or less safe. This website uses this type of cookies for which it is not necessary to request the user's consent.
- Profiling Cookies are used to mark the user navigation and to create profiles according to his/her liking, habits, choices, etc. Due to these cookies, personalized advertisements can be transmitted to user's devices. Some operations could not be done without using cookies, which are technically essential in some cases.
- Analysis cookies can be either technical or profiling cookies. This website uses analytics cookies for which it is necessary to request the user's consent. Cookies do not allow the website manager to view files on users' computer.

### Cookie List and Opt-out

We provide links to opt-out from Google: (<https://tools.google.com/dlpage/gaoptout>)

In particular, the website uses the following cookies, for which it is necessary to request the user's consent:



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Cookie name	1st/3rd party	duration	purpose	Opt out
CONSENT	3rd	20 years	Profiling	Google
NID	3rd	6 months	Profiling	Google
_ga	1st	1 day	Analysis	Google
_gat	1st	1 day	Analysis	Google
_gid	1st	1 day	Analysis	Google
__gads	3rd	2 years	Analysis	Google
_ga	3rd	2 years	Analysis	Google
_gid	3rd	1 day	Analysis	Google

### Cookies control

Internet web browsers allow modifying cookies settings. Browsers are set up by default to accept cookies, but it is possible to block some or all of them. Each browser has different methods to disallow cookies. The total or partial disabling of technical cookie can threaten the use of certain functionality of websites, reserved to registered users. On the contrary, the usability of public contents is possible even disabling cookies altogether. The disability of third party cookies does not compromise by no means the web surfing.

Please, consult the following websites to disable cookie:

- Microsoft Internet Explorer: Choose "Internet Options" from the drop down menu above at the right side. Then choose "Privacy" at pop up window and choose the Personal settings for cookies, or consult the following link: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
- Google Chrome: Choose "Settings" from the drop down menu above at the right side. Then choose "Show advanced settings..." and choose Personal settings for privacy, or consult the following link: [https://support.google.com/chrome/bin/answer.py?hl=en&answer=95647&p=cpn\\_cookie\\_s](https://support.google.com/chrome/bin/answer.py?hl=en&answer=95647&p=cpn_cookie_s).
- Mozilla Firefox: Choose "Settings" from the drop down menu above at the right side. Select "Privacy" in the pop up window and then choose Personal settings for cookies, or consult the following link: <http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies>
- Apple Safari: Choose "Personal Settings" from the drop down menu above at the right side. Then, select "Security" and choose Personal Settings for cookies, or consult the link: <https://www.apple.com/legal/privacy/it/cookies/>

In case the user gives his/her consent to use cookies, the choice will be registered in a specific technical cookie.



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## Privacy Policy

The protection of your privacy is a very serious concern to Profilio Company, Therefore we take security measures to protect your data, We want you to be able to visit our web pages without being concerned about security issues. It is generally possible to use our website without the disclosure of personal data. The following Privacy Statement will provide you with an overview of how Profilio Company guarantees the protection of your privacy, the type of data being collected as well as its main purpose.

### *IP address.*

The IP address is transmitted on every server request to let the server know where the response has to be sent. Your Internet Service Provider (ISP) gives you an IP address as soon as you connect to the Internet, and the ISP can retrace which IP address was assigned to which of its customers at any given time. For as long as the IP address is saved, it is theoretically possible to identify the owner of the Internet connection via the ISP. We use IP addresses in order to prevent misuse of our services, including hacking and automated requests. In any case we record your IP address only temporarily to protect your data.

### *Cookies*

The Purpose of Cookies is to allow you to use the Profilio's website without any restrictions, we use what are referred to as session cookies. Session cookies are tiny parcels of information that are automatically saved to the memory of the website visitors' computer. In a session cookie a randomly created and unique identification number is deposited, a so-called session ID. A cookie additionally contains information on its origin and its life span. These cookies are unable to save any other kind of data. Placing session cookies on your computer does not enable us to see the files on your computer. After you conclude your session, i.e. after you close your browser window, the session cookies are automatically deleted. We use analysis cookies: the extent of such data is described below. The data are only used internally and serve primarily to continuously improve our website and adapt it to suit your business or personal requirements.

### *Data*

The data you provide to Profilio Company will be treated under The General Data Protection Regulation (GDPR, EU 2016/679), We believe that information security and reliability is the basis for stable and successful customer relations. We would therefore inform you about the measures we take at Profilio Company to protect your data and privacy. We follow the principles and actions listed below:

- *Responsibility:* We define a responsible accountant as data controller. The actual data controller is Fabio Celli ([info@profilio.co](mailto:info@profilio.co)).
- *Accountability:* all processes regarding data management are automated. In the case where manual tasks are needed, all employees are required to process your personal data in a lawful and fair manner, and in a way that is comprehensible to you and in compliance with data secrecy in accordance with Section 6 Data Protection Act (DPA).



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- *Minimization*: Profilio collects only the minimum amount of data required to run the service, for instance: identifiers, dates, emails, company names and transactions. We receive this data from our partner Paypal.com, and we use this data to provide the services and keep you informed about our products.
- *Protection by default and by design*: we keep your data secure with encryption algorithms and frequent password changes. In any case, we store your personal data in accordance with the applicable prescribed statutory time periods.
- *Processing activities*: In accordance with Article 30 GDPR, Profilio Company maintains a so-called "record of processing activities" in which the data applications operated by us as well as the relevant processing activities are documented. This existing record should always be kept up-to-date in accordance with the data protection provisions of Article 30 GDPR. Compliance with the data protection and data security regulations is guaranteed in Profilio Company by the following binding measures: a) Privacy Concept, b) Privacy Policy, c) Privacy Program, d) Privacy Management System.

The Privacy Concept lays down the desired level of data protection requirements, as defined by the legal representatives of Profilio Company. This serves as the basis for the development of the demands on Privacy Policy and on the continuous privacy improvement process within Profilio Company.

On account of the assessment of privacy-related processes and the relevant data protection legislation, a written Privacy Policy (this document) was drawn up by Profilio Company to serve as a basis for the implementation of the Privacy Program and the establishment of the Privacy Management System. As part of the Privacy Program, data protection goals are continuously being specified and the measures to be implemented are defined in the form of a work program and provided with corresponding implementation deadlines.

The Privacy Management System defines the rules, policies, measures, resources, methods, responsibilities, procedures and organization structures for implementing and monitoring the Privacy Program. Modeled on the international standards ISO 9001:2008 and ISO/IEC 27001:2005, our Privacy Policy was designed along the lines of the PDCA (Plan, Do, Check, Act) model to achieve continuous improvement.

- *Special categories of personal data*: Profilio Company does not require any special categories of personal data within the meaning of Article 9(1) GDPR.
- *Guaranteed Privacy*: in principle, we do not process your personal data without your consent or outside of the framework of the existing contractual relationship with you and/or for the agreed purpose (providing and improving the service). However, we could use data in aggregated form for publications or press releases.
- *Transferring and Surrendering Data*: Any transfer of personal data to third parties is made only with your consent. Excepted from this are data transfers that are necessary due to a legal obligation or for fulfilment of a contract. The transfer of personal data to



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processors (service providers) shall, in principle, be limited to those undertakings providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing the personal data complies with the requirements of the GDPR and ensures the protection of the rights of the data subject.

- **Infrastructure Security:** The technologies employed by Profilio Company to process your personal data (hardware, software, network, infrastructure) comply with state-of-the-art security technologies. Appropriate technical and organisational measures have been set for these procedures, in order to comply with the requirements of the GDPR.

#### *Information to be provided*

We hereby inform you about the personal data processed on our website and/or by our service(s), as well as the claims and rights to data protection to which you are entitled:

- **Categories of personal data:** Personal data that you enter yourself when contacting us via email or as input to our service are processed automatically and manually. Profilio Company processes your personal data exclusively in the context of the purpose for which you voluntarily provided your data in exercising your right to informational self-determination. This consent to the processing your personal data for the stated purposes remains valid until you revoke it, at any time, within the scope of the data protection regulations.
- **Right of access to personal data:** In accordance with the provisions of the GDPR, you have the right to information at any time about the data processed by Profilio Company regarding your person, their origin as well as possible recipients of transmissions and the purpose of the data use. Information can be obtained, based on your written request, from the data controller with an email at [info@profilio.co](mailto:info@profilio.co). If all legal requirements for the processing of your request for access to personal data have been met, we will comply with it and grant you the relevant access to your personal data within a period of 1 (one) month.
- **Right to erasure:** In accordance with the provisions of the GDPR, you have the right at any time to the erasure of your personal data which were processed by Profilio Company, provided that your request for erasure does not conflict with any potential statutory retention periods or other legal obligations. If all preconditions for implementing your request for erasure have been met, we will comply with it and erase your data within a period of 1 (one) month.
- **Right to object:** In accordance with the provisions of the GDPR, you have the right - insofar as the processing of your personal data is not provided for by law - to object to the violation of your overriding confidentiality interests, which are worthy of protection. If these preconditions have been met, we will delete your data within a period of 1 (one) month, taking into account any legal retention periods.
- **Right to restriction:** In accordance with the provisions of the GDPR, you have the right to restrict processing of personal data under certain conditions. If all statutory preconditions



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have been met, we will restrict the processing of your personal data within a period of 1 (one) month.

- *Categories of recipients:* the data will not be passed on to recipients who use this data for their own purposes. No transfer to recipients in a third country (outside the EU) or to an international organisation is envisaged. There is no automated decision-making process.
- *Right to data portability:* There is no right to data portability.
- *Revocation of consent:* In accordance with the provisions of the GDPR, you have the right to revoke your consent to the processing of your personal data at any time, without stating any reasons. In this case, we will not process your data further and will erase them, taking into account any statutory retention periods, within a period of 1 (one) month.

#### *Further Information*

Your trust is very important to us. If you have further questions regarding the processing of your personal data by Profilio Company, please do not hesitate to contact the Data controller at [info@profilio.co](mailto:info@profilio.co).