

# Level Project Privacy Notice

Below is all the information required by EU Regulation 2016/676 concerning the protection of individuals with regard to the processing of personal data (GDPR).

## General Provisions

In the following paragraphs, information of general validity is made available to natural persons (“Data Subjects”) who visit the Website which can be reached at <https://loving-edison-d35fe5.netlify.app/> (hereinafter “the Website”) and intend to use the online services available on the Website.

## Identity of the owner

The Data Controller of the personal data of the Data Subjects is Level Project S.r.l. (hereinafter “the Data Controller”) with registered office in Via Lecce, 86 - 73013 Galatina (LE).

## Processing Methods

The processing of personal data described below is carried out using IT tools with criteria strictly related to the purposes indicated and, in any case, in order to guarantee the security and confidentiality of the data processed. In particular, specific security measures are adopted in order to minimize the risk of destruction or loss, even accidental, of information, and to avoid unauthorized access and any other unauthorized processing activity. The security measures adopted, however, cannot exclude with certainty the risks of interception or compromise of personal data transmitted with telematic tools. It is therefore recommended to verify that the device used by the user is equipped with software systems suitable for the protection of the telematic transmission of data, both inbound and outbound (such as, for example, updated antivirus systems, firewalls and antispam filters).

## Data recipients

Personal data processed by the Data Controller are not disclosed, that is, they are not disclosed to unqualified individuals, in any possible form, including that of making them available or simple consultation. Instead, they can be communicated to duly trained and authorized staff who work for the Data Controller and to some external subjects who collaborate with them. They can also be communicated, to the extent strictly necessary, to individuals who, for the purpose of fulfilling orders or other requests or services relating to the transaction or contractual relationship with the Data Controller, must supply goods and / or services on behalf of the Data Controller. Finally, they can be communicated to the individuals entitled to access them by virtue of the provisions of the law, regulations, Community legislations.

## Data Transfer

In no instance the Data Controller shall transfer personal data to third countries or to international organizations. However, the Data Controller reserves the right to use cloud services: in this case, the service providers will be selected from those who provide adequate guarantees, as required by art. 46 of the GDPR.

## Rights of the Data Subject

With regards to GDPR articles:

- 15 — right of access,
- 16 — right to rectification,
- 17 — right to erasure,
- 18 — right to restriction of processing,
- 20 — right to data portability,
- 21 — right to object,
- 22 — automated individual decision-making, including profiling

Any data subject can exercise their rights by writing to the Data Controller at [info@levelproject.com](mailto:info@levelproject.com), specifying the subject of his request, the right they intend to exercise and attaching a photocopy of an identity document certifying the identity of the applicant to allow the Data Controller to ascertain the legitimacy of the request.

## Right to lodge a complaint

Every data subject shall have the right to lodge a complaint with a supervisory authority in the Member State of his or her habitual residence.

## Automated decision-making processes

In no instance shall the Data Controller use automated decision-making processes on the data subject’s data producing legal effects concerning him or her or similarly significantly affects him or her.

## Considerations on Webcam use and on “Cosa è vero?”

The website allows the use of a webcam and the ability to answer the question “Cosa è vero?” for promotional purposes only. The use of the webcam is also subject to the explicit consent of the user who can allow or block its activation before starting to browse the website. It should be noted in this regard that the Data Controller does not carry out any collection, registration, storage or any other processing of the images which will appear directly on the visitor’s screen. Similarly, the Data Controller does not collect, record, store or carry out any type of processing of any of the text entered by the visitor in response to the question “Cosa è vero?”. In any case, visitors are advised to pay particular attention to the environment they are in before activating the webcam of the device they are using and to whoever is next to them before typing their answer.

## Detailed information

The following paragraphs contain information on the specific processing of personal data carried out by the Data Controller.

### Information for web browsing

This information is provided to those who access and consult our website:

#### Cookie policy

Cookies are small text files that are stored on the terminal used to visit websites. They are widely used in order to support the efficient functioning of the sites, as well as to provide information to the site managers.

Cookies can be classified into two macro-categories as defined by the Italian Data Privacy authority, "Garante della Protezione dei Dati Personali" ([www.garanteprivacy.it](http://www.garanteprivacy.it)):

- technical cookies, used for the sole purpose of "carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information service explicitly requested by the contractor or user to provide such service"
- profiling cookies, used to link specific actions or behavioural patterns to specific, identified or identifiable subjects in the use of the functions offered (patterns) in order to group the different profiles within homogeneous clusters of different size, in so that it is possible for the Data Controller, among other things, to modulate the provision of the service in an increasingly personalized way beyond what is strictly necessary for the provision of the service, as well as to send targeted advertising messages, i.e. in line with the preferences expressed by the user in the context of surfing the net.

Current legislation allows the use of technical cookies even in the absence of consent of the interested party, which is instead necessary for the use of profiling cookies.

Cookies can also be divided between:

- first-party cookies, created within the domain by the operator of the visited website, used to personalise the browsing experience
- third-party cookies, created by domains other than that of the visited website, usually used for monitoring and tracking of users, in order to offer personalized advertisements

Analytical (or statistical) cookies, useful for monitoring the use of the site by visitors, can be considered technical cookies if they are first-party, or if they are third-party as long as:

- they are used for statistical purposes only;
- they have a reduced identification ability (e.g. masking portions of the IP address stored within the cookies);
- are processed and stored separately, so as not to be cross-referenced with other information that may be available.

The website visitor can change their cookies preferences by adjusting the browser's settings. To find out more about cookies, including how to find out which cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

Our website only uses technical cookies for the purposes described below.

### Browsing Data

While browsing the website, the computer systems used to operate it automatically acquire some information whose transmission is implicit in the use of Internet communication protocols. This category of data includes IP addresses or domain names of computers and terminals used by users, the addresses in URI / URL (Uniform Resource Identifier / Locator) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment.

This information can also be stored and filed thanks to the use of cookies for the purposes described below.

### Purpose of the treatment

Data collected by the Data Controller are used to ensure the correct functionality of the website and the usability of its services, as well as to obtain aggregate and anonymized statistical information relating to the use of the website.

### Legal basis of the processing

The use of personal data, also through the use of technical cookies, is a processing carried out in the legitimate interest of the Data Controller, intended to offer an online service in line with the expectations of its visitors.

### Refusal to provide data

The Data Subject can refuse to give the Data Controller their browsing data. To do this, they must disable cookies by following the instructions provided by the browser in use. In this regard, please refer in particular to the information published on the Google website <https://www.google.com/intl/it/policies/privacy/> and to the Google Analytics Opt-out browser Ad-on <https://tools.google.com/dlpage/gaoptout?hl=it>. This choice, however, could make the site less efficient.

### Further information

We would like to clarify that if a user lands on the website after clicking on a banner published on another website, he/she must know that it is the advertising network's manager that has assigned cookies necessary to detect the throughput and the amount of any purchases made. Responsibility for the management of these cookies lies with the manager of the advertising network whose privacy policy is usually available on its institutional website.

### Data Storage

The period of validity of cookies and storage of the information acquired as described is 6 months.

### Information for those wishing to sign up to our newsletter

This information is provided to those who wish to subscribe to our newsletter.

**Data source**

The personal data processed are provided by the Data Subject by filling out the registration form available on our website.

**Categories of data processed**

Data being processed are common data (e-mail address).

**Purpose of the treatment**

Personal data is processed by the Data Controller for the forwarding of newsletters and promotional communications on the Data Controller's services and initiatives.

**Legal Basis for the treatment**

The legal basis for the legitimate processing of personal data is the consent expressed by the interested party at the time of entering their e-mail address.

**Withdrawal of consent**

The Data Subject has the right, at any time, to withdraw consent to the processing of data for the purposes indicated by using the link specifically included in all newsletters sent by the Data Controller (so-called "opt-out") or by writing directly to the Data Controller, exercising their rights.

**Refusal to provide data**

The provision of personal data is completely optional. Failure to enter the e-mail address will not, however, allow you to receive the Data Controller's newsletters.

**Data Retention**

The Data Controller retains the data being processed until the data subject objects to the processing by opt-out.