

PRIVACY POLICY OF GIGLIO.COM

Giglio.com collects some Personal Data from its Users.

Users may be subject to different protection standards and broader standards may therefore apply to some. In order to learn more about the protection criteria, Users can refer to the applicability section.

This document contains [a section dedicated to California consumers and their privacy rights](#).

This document contains [a section dedicated to Virginia consumers and their privacy rights](#).

This document contains [a section dedicated to Colorado consumers and their privacy rights](#).

This document contains [a section dedicated to Connecticut consumers and their privacy rights](#).

This document contains [a section dedicated to Utah consumers and their privacy rights](#).

This document contains [a section dedicated to Brazilian Users and their privacy rights](#).

This document can be printed for reference by using the print command in the settings of any browser.

POLICY SUMMARY

PERSONAL DATA PROCESSED FOR THE FOLLOWING PURPOSES AND USING THE FOLLOWING SERVICES:

- **Advertising**
 - **Criteo and Facebook Lookalike Audience**
Personal Data: Cookies; Usage Data
 - **Facebook Audience Network**
Personal Data: Cookies; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data
 - **IBM**
Personal Data: Trackers; Usage Data
- **Analytics**
 - **Google Analytics, Google Ads conversion tracking, Facebook Ads conversion tracking (Facebook pixel), Quantcast Measure, Analytics collected directly, Display Advertising extension for Google Analytics and Hotjar Form Analysis & Conversion Funnels**
Personal Data: Cookies; Usage Data
 - **Google Analytics with anonymized IP**
Personal Data: Tracker; Usage Data
 - **Google Analytics 4**
Personal Data: browser information; city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data
- **Commercial affiliation**
 - **LinkShare**
Personal Data: Cookies; Usage Data
 - **Rakuten Advertising Affiliate**
Personal Data: Cookies; Universally unique identifier (UUID); Usage Data
- **Contacting the User**
 - **Mailing List or Newsletter and Contact form**
Personal Data: email address; first name
 - **Phone contact**
Personal Data: phone number
- **Content commenting**
 - **Trustpilot**

- **Content performance and features testing (A/B testing)**
 - **Formisimo**
 - **Google Optimize**
Personal Data: Tracker; Usage Data
- **Displaying content from external platforms**
 - **Google Fonts**
Personal Data: Usage Data; various types of Data as specified in the privacy policy of the service
- **Handling payments**
 - **PayPal, Gestpay Banca Sella, Amazon Payments, Apple Pay, Klarna, SOFORT and MyBank UniCredit**
Personal Data: various types of Data as specified in the privacy policy of the service
- **Heat mapping and session recording**
 - **Hotjar Heat Maps & Recordings**
Personal Data: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service
- **Hosting and backend infrastructure**
 - **iubenda Consent Solution**
Personal Data: Data communicated while using the service
- **Infrastructure monitoring**
 - **Monitis and Sentry**
Personal Data: various types of Data as specified in the privacy policy of the service
 - **Instana**
- **Interaction with data collection platforms and other third parties**
 - **Hotjar Recruit User Testers**
Personal Data: Cookies; Usage Data; various types of Data
- **Interaction with external social networks and platforms**
 - **Facebook Like button and social widgets, Twitter Tweet button and social widgets and Pinterest "Pin it" button and social widgets**
Personal Data: Cookies; Usage Data
- **Interaction with online survey platforms**
 - **Hotjar Poll & Survey widgets**
Personal Data: Cookies; Usage Data; various types of Data
- **Location-based interactions**
 - **Geolocation**
Personal Data: geographic position
- **Managing contacts and sending messages**
 - **Mailchimp and Sendgrid**
Personal Data: email address
 - **Mandrill**
Personal Data: email address; Usage Data
 - **Emarsys Email Marketing**
Personal Data: email address; first name; last name; Trackers; Usage Data
- **Managing support and contact requests**
 - **LiveAgent**
 - **Zendesk**

- Personal Data: various types of Data as specified in the privacy policy of the service
- **Registration and authentication**
 - **Direct registration**
Personal Data: address; email address; first name; last name; phone number
 - **Login with Amazon**
Personal Data: various types of Data as specified in the privacy policy of the service
- **Remarketing and behavioral targeting**
 - **Facebook Remarketing, Remarketing with Google Analytics, Google Ads Remarketing and Criteo Dynamic Retargeting**
Personal Data: Cookies; Usage Data
 - **Facebook Custom Audience**
Personal Data: Cookies; email address
- **Tag Management**
 - **Google Tag Manager**
Personal Data: Usage Data
- **Traffic optimization and distribution**
 - **Cloudflare**
Personal Data: Cookies; various types of Data as specified in the privacy policy of the service

INFORMATION ON OPTING OUT OF INTEREST-BASED ADVERTISING

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

FURTHER INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

- **Riskified**
In accordance with item IV, art. 25, c. 6 “Transfer of personal data to third countries” of the Directive 95/46/EC, the data may be transferred to non EU countries or countries not belonging to the European Economic Area, that however grant an adequate level of protection of the personal data. In any case, the data processing will take place in accordance with the provisions of the current rules and regulations.
- **Banca Sella - Antufraud Services**
In accordance with the new EU Regulation UE 2016/679 on Data Protection (GDPR), the data may be transferred to non EU countries or countries not belonging to the European Economic Area, that however grant an adequate level of protection of the personal data. In any case, the data processing will take place in accordance with the provisions of the current rules and regulations.
- **Dynamic Yield**
We use the services of Dynamic Yield Ltd. With the personalization tool Dynamic Yield our website is optimized in order to make your website visit a personal experience through tailor-made recommendations and content. We use the page

content you call up to recommend relevant content to you. Dynamic Yield collects pseudonymized information about your usage activities on our site. Cookies are used to store exclusively pseudonymized information under a randomly generated ID (pseudonym). A direct personal reference is therefore not possible. You can object to this recording at any time by clicking on this link and activating the opt-out (<https://www.dynamicyield.com/privacy-policy/#optinout>). An opt-out cookie is set to prevent the future collection of data from your visit to this website. Further information on Dynamic Yield: <https://www.dynamicyield.com/gdpr/>

- **Selling goods and services online**

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by [giglio.com](https://www.giglio.com) depends on the payment system used.

- **Privacy Shield participation: data transfers from the EU to the United States**

The Owner participates in and complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the European Union to the United States. The Owner has certified to the Department of Commerce that it adheres to the Privacy Shield Principles.

If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view the Owner's certification, please visit <https://www.privacyshield.gov/> (or find the direct link to the certification list of Privacy Shield participants maintained by the Department of Commerce <https://www.privacyshield.gov/list>).

What does this mean for the European User?

The Owner is responsible for all processing of Personal Data it receives under the Privacy Shield Framework from European Union individuals and commits to subject the processed Personal Data to the Privacy Shield Principles.

This, most importantly, includes the right of individuals to access their personal data processed by the Owner.

The Owner also complies with the Privacy Shield Principles for all onward transfers of Personal Data from the EU, which means that it remains liable in cases of onward transfers to third parties.

With respect to Personal Data received or transferred pursuant to the Privacy Shield Framework, the Owner is subject to the investigatory and regulatory enforcement powers of the FTC, if not stated otherwise in this privacy policy.

The Owner is further required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Dispute resolution under the Privacy Shield

In compliance with the Privacy Shield Principles, the Owner commits to resolve complaints about its collection or use of the User's Personal Data. European Union individuals with inquiries or complaints regarding this Privacy Shield policy should

first contact the Owner at the contact details supplied at the beginning of this document referring to “Privacy Shield” and expect the complaint to be dealt with within 45 days.

In case of failure by the Owner to provide a satisfactory or timely response, the User has the option of involving an independent dispute resolution body, free of charge. In this regard, the Owner has agreed to cooperate with the panel established by the EU data protection authorities (DPAs) and comply with the advice given by the panel with regard to data transferred from the EU. The User may therefore contact the Owner at the email address provided at the beginning of this document in order to be directed to the relevant DPA contacts.

Under certain conditions – available for the User in full on the Privacy Shield website (<https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>) – the User may invoke binding arbitration when other dispute resolution procedures have been exhausted

- **Push notifications**
Giglio.com may send push notifications to the User.
- **iubenda Cookie Solution (remote consent Cookie)**
Remote iubenda consent Cookie (_iub_cs-X) is set by the iubenda Cookie Solution and stores User preferences related to Trackers under the .iubenda.com domain.
- **iubenda Cookie Solution (consent Cookie)**
iubenda consent Cookie (_iub_cs-X) is set by the iubenda Cookie Solution and stores User preferences related to Trackers in the local domain.
- **iubenda Consent Solution localStorage**
iubenda ConS JS library localStorage (IUB_DATA) temporarily stores pending data in a storage space internal to the User's browser (localStorage) until it's received by the API, then it is deleted.
- **iubenda CCPA Cookie (usprivacy)**
iubenda CCPA Cookie (usprivacy) is set by the iubenda Cookie Solution and stores California consumer opt-out choices in the local domain.

CONTACT INFORMATION

- **Owner and Data Controller**
Giglio.com S.p.A. - Via Solferino, 7 - 20121 Milano (Italia)
Owner contact email: giglio@giglio.com

FULL POLICY

OWNER AND DATA CONTROLLER

Giglio.com S.p.A. - Via Solferino, 7 - 20121 Milano (Italia)
Owner contact email: giglio@giglio.com

TYPES OF DATA COLLECTED

Among the types of Personal Data that giglio.com collects, by itself or through third parties, there are: Cookies; Usage Data; geographic position; email address; first name; last name; phone number; address; various types of Data; Universally

unique identifier (UUID); unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Data communicated while using the service; number of Users; city; device information; session statistics; latitude (of city); longitude (of city); browser information.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using giglio.com. Unless specified otherwise, all Data requested by giglio.com is mandatory and failure to provide this Data may make it impossible for giglio.com to provide its services. In cases where giglio.com specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner. Any use of Cookies – or of other tracking tools – by giglio.com or by the owners of third-party services used by giglio.com serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through giglio.com and confirm that they have the third party's consent to provide the Data to the Owner.

MODE AND PLACE OF PROCESSING THE DATA

METHODS OF PROCESSING

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of giglio.com (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

LEGAL BASIS OF PROCESSING

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

PLACE

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located. Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

If broader protection standards are applicable, Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data. If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

RETENTION TIME

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for. Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority. Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

THE PURPOSES OF PROCESSING

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Interaction with external social networks and platforms, Location-based interactions, Analytics, Managing contacts and sending messages, Contacting the User, Registration and authentication, Handling payments, Remarketing and behavioral targeting, Traffic optimization and distribution, Infrastructure monitoring, Heat mapping and session recording, Interaction with online survey platforms, Interaction with data collection platforms and other third parties, Commercial affiliation, Displaying content from external platforms, Managing support and contact requests, Content performance and features testing (A/B testing), Content commenting, Tag Management, Advertising and Hosting and backend infrastructure.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

Personal Data is collected for the following purposes and using the following services:

- **Advertising**

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on giglio.com, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside giglio.com. For more information, please check the privacy policies of the relevant services. Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Criteo (Criteo SA)

Criteo is an advertising service provided by Criteo SA.

Personal Data processed: Cookies; Usage Data.

Place of processing: France – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

Facebook Audience Network (Facebook Ireland Ltd)

Facebook Audience Network is an advertising service provided by Facebook Ireland Ltd In order to understand Facebook's use of Data, consult [Facebook's data policy](#).

Giglio.com may use identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Facebook Audience Network service. One of the ways Audience Network shows ads is by using the User's ad preferences. The User can control this in the [Facebook ad settings](#).

Users may opt-out of certain Audience Network targeting through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Audience Network related sections of this privacy policy, if available.

Personal Data processed: Cookies; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: identifiers; internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

Facebook Lookalike Audience (Facebook Ireland Ltd)

Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Facebook Ireland Ltd that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of giglio.com or engagement with relevant content across the Facebook apps and services. On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this [opt-out page](#).

Personal Data processed: Cookies; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

IBM (International Business Machines Corporation)

IBM is an advertising service provided by International Business Machines Corporation.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

- **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of giglio.com, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

Google Ads conversion tracking

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on giglio.com.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Facebook Ads conversion tracking (Facebook pixel) (Facebook, Inc.)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on giglio.com. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Quantcast Measure (Quantcast Corporation)

Quantcast Measure is an analytics service provided by Quantcast Corporation.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Analytics collected directly (Giglio.com)

Giglio.com uses an internal analytics system that does not involve third parties.

Personal Data processed: Cookies; Usage Data.

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the VCDPA

Display Advertising extension for Google Analytics

Google Analytics on giglio.com might use Google's Interest-based advertising, 3rd-party audience data and information from the DoubleClick Cookie to extend analytics with demographics, interests and ads interaction data.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Hotjar Form Analysis & Conversion Funnels (Hotjar Ltd.)

Hotjar is an analytics service provided by Hotjar Ltd. Hotjar honors generic Do Not Track headers. This means your browser can tell its script not to collect any of your data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Cookies; Usage Data.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Google Analytics with anonymized IP (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited ("Google").

Google utilizes the Data collected to track and examine the use of giglio.com, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Google Analytics 4 (Google Ireland Limited)

Google Analytics 4 is a web analysis service provided by Google Ireland Limited ("Google").

Google utilizes the Data collected to track and examine the use of giglio.com, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google's official documentation](#).

Personal Data processed: browser information; city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: identifiers; internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Commercial affiliation**

This type of service allows giglio.com to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics. Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with giglio.com. For details of which data are collected, please refer to the privacy policy of each service.

LinkShare (Rakuten Marketing LLC)

LinkShare is a commercial affiliation service provided by Rakuten Marketing LLC.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

Rakuten Advertising Affiliate (Rakuten Marketing LLC)

Rakuten Advertising Affiliate is a banner commercial affiliation service provided by Rakuten Marketing LLC.

Personal Data processed: Cookies; Universally unique identifier (UUID); Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Category of personal information collected according to the CCPA: identifiers; internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

- **Contacting the User**

Mailing List or Newsletter (Giglio.com)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning giglio.com. Your email address might also be added to this list as a result of signing up to giglio.com or after making a purchase.

Personal Data processed: email address; first name.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the VCDPA, CPA, CTDPA and UCPA

Contact form (Giglio.com)

By filling in the contact form with their Data, the User authorizes giglio.com to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: email address; first name.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the VCDPA

Phone contact (Giglio.com)

Users that provided their phone number might be contacted for commercial or promotional purposes related to giglio.com, as well as for fulfilling support requests.

Personal Data processed: phone number.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Content commenting**

Content commenting services allow Users to make and publish their comments on the contents of giglio.com. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments. If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

Trustpilot

We use additional widgets from the third party review site Trustpilot, to embed recent customer reviews and feedback scores into our website pages. These widgets may use cookies to gain statistical data and measure traffic from our pages as well as the geographical area of visitors. With prior consent we use your personal information to invite customer reviews via Trustpilot's system. This consists of a reference number relating to the transaction, name, and email address. To review our service an account must be created with Trustpilot, where you can set preferences relating to the personal data which is shared. A copy of Trustpilot's privacy policy can be found at: <https://legal.trustpilot.com/end-user-privacy-terms>

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

- **Content performance and features testing (A/B testing)**

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of giglio.com.

Formisimo

Formisimo uses analytical/performance cookies to simplify the usage of the website and to improve our services. Formisimo does not track or store any personally identifiable information. Formisimo collects aggregated anonymous information and it reports website trends without identifying individual visitors <https://www.formisimo.com/privacy-policy>
<https://intercom.help/formisimo/faq/formisimo-and-gdpr>

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

Google Optimize (Google Ireland Limited)

Google Optimize is an A/B testing service provided by Google Ireland Limited ("Google").

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of giglio.com and interact with them. This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Fonts (Google Ireland Limited)

Google Fonts is a typeface visualization service provided by Google Ireland Limited that allows giglio.com to incorporate content of this kind on its pages.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Handling payments**

Payment processing services enable giglio.com to process payments by credit card, bank transfer or other means. To ensure greater security, giglio.com shares only the information necessary to execute the transaction with the financial intermediaries handling the transaction. Some of these services may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.

PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments using their PayPal credentials.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA

Gestpay Banca Sella (Banca Sella S.p.A.)

Gestpay is a payment service provided by Banca Sella S.p.A.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Italy – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Amazon Payments (Amazon)

Amazon Payments is a payment service provided by Amazon.com, Inc., which allows Users to make online payments using their Amazon credentials.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: See the Amazon privacy policy – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Apple Pay (Apple Inc.)

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Klarna (Klarna AB)

Klarna is a payment service provided by Klarna AB.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Sweden – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

SOFORT (SOFORT GmbH)

SOFORT is a payment service provided by SOFORT GmbH.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Germany – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

MyBank UniCredit (UniCredit S.p.A)

MyBank is a payment service provided by UniCredit S.p.A.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Italy – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Heat mapping and session recording**

Heat Mapping services are used to display the areas of a page where Users most frequently move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior. Some of these services may record sessions and make them available for later visual playback.

Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd. Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of

the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Cookies; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable giglio.com to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of giglio.com.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

iubenda Consent Solution (iubenda srl)

iubenda Consent Solution is a service that facilitates the collection and management of proofs of consent provided by iubenda srl.

Personal Data processed: Data communicated while using the service.

Place of processing: Italy – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Infrastructure monitoring**

This type of service allows giglio.com to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved. Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of giglio.com.

Monitis (Monitis US LLC.)

Monitis is a monitoring service provided by Monitis US LLC.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Sentry (Functional Software, Inc.)

Sentry is a monitoring service provided by Functional Software, Inc. .

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Interaction with data collection platforms and other third parties**

This type of service allows Users to interact with data collection platforms or other services directly from the pages of giglio.com for the purpose of saving and reusing data. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Hotjar Recruit User Testers (Hotjar Ltd.)

The Hotjar Recruit User Testers widget is a service for interacting with the Hotjar data collection platform provided by Hotjar Ltd. Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Cookies; Usage Data; various types of Data.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

- **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of giglio.com. The interaction and information obtained through giglio.com are always subject to the User's privacy settings for each social network. This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on giglio.com isn't being connected back to the User's profile.

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA and VCDPA

Pinterest “Pin it” button and social widgets (Pinterest)

The Pinterest “Pin it” button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Interaction with online survey platforms**

This type of service allows Users to interact with third-party online survey platforms directly from the pages of giglio.com. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Hotjar Poll & Survey widgets (Hotjar Ltd.)

The Hotjar Poll & Survey widgets are services that enable interaction with the Hotjar platform provided by Hotjar Ltd. Hotjar honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

Personal Data processed: Cookies; Usage Data; various types of Data.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Location-based interactions**

Geolocation (Giglio.com)

Giglio.com may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by giglio.com.

Personal Data processed: geographic position.

Category of personal information collected according to the CCPA: geolocation data.

This processing constitutes:

- a sale according to the VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

- **Managing contacts and sending messages**

This type of services makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User. These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

Mailchimp (The Rocket Science Group, LLC.)

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Personal Data processed: email address.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA

Sendgrid (Sendgrid)

Sendgrid is an email address management and message sending service provided by Sendgrid Inc.

Personal Data processed: email address.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA

Mandrill (The Rocket Science Group, LLC.)

Mandrill is an email address management and message sending service provided by The Rocket Science Group, LLC.

Personal Data processed: email address; Usage Data.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: identifiers; internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

Emarsys Email Marketing (SAP Emarsys eMarketing Systems GmbH)

Emarsys Email Marketing is an email address management and message-sending service provided by SAP Emarsys eMarketing Systems GmbH.

Personal Data processed: email address; first name; last name; Trackers; Usage Data.

Place of processing: Austria – [Privacy Policy](#).

Category of personal information collected according to the CCPA: identifiers; internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

• **Managing support and contact requests**

This type of service allows giglio.com to manage support and contact requests received via email or by other means, such as the contact form. The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

LiveAgent

Quality Unit, LLC (LiveAgent) We use LiveAgent to provide customer support systems including live chat, support ticket and knowledge base. Their Privacy Policy can be viewed at <https://www.ladesk.com/security-privacy-policy/>

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

Zendesk (Zendesk, Inc.)

Zendesk is a support and contact request management service provided by Zendesk Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Registration and authentication**

By registering or authenticating, Users allow giglio.com to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, giglio.com will be able to access some Data, stored by these third party services, for registration or identification purposes.

Direct registration (Giglio.com)

The User registers by filling out the registration form and providing the Personal Data directly to giglio.com.

Personal Data processed: address; email address; first name; last name; phone number.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

Login with Amazon (Amazon)

Login with Amazon is a registration and authentication service provided by Amazon.com, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Remarketing and behavioral targeting**

This type of service allows giglio.com and its partners to inform, optimize and serve advertising based on past use of giglio.com by the User. This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity. Some services offer a remarketing option based on email address lists. In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the [Network Advertising Initiative opt-out page](#). Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a Remarketing and Behavioral Targeting service provided by Facebook, Inc. that connects the activity of giglio.com with the Facebook advertising network.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

Remarketing with Google Analytics

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the tracking activity performed by Google Analytics and its Cookies with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

Google Ads Remarketing

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of giglio.com with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

Criteo Dynamic Retargeting (Criteo SA)

Criteo Dynamic Retargeting is a remarketing and behavioral targeting service provided by Criteo SA., that connects the activity of giglio.com with the Criteo advertising network.

Personal Data processed: Cookies; Usage Data.

Place of processing: France – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

Facebook Custom Audience (Facebook Ireland Ltd)

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook Ireland Ltd that connects the activity of giglio.com with the Facebook advertising network.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this [opt-out page](#).

Personal Data processed: Cookies; email address.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: identifiers; internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

- **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on giglio.com in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

- **Traffic optimization and distribution**

This type of service allows giglio.com to distribute their content using servers located across different countries and to optimize their performance. Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between giglio.com and the User's browser. Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

Cloudflare (Cloudflare)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc. The way Cloudflare is integrated means that it filters all the traffic through giglio.com, i.e., communication between giglio.com and the User's browser, while also allowing analytical data from giglio.com to be collected.

Personal Data processed: Cookies; various types of Data as specified in the privacy policy of the service.

Place of processing: US – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

INFORMATION ON OPTING OUT OF INTEREST-BASED ADVERTISING

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

FURTHER INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

- **Riskified**

In accordance with item IV, art. 25, c. 6 “Transfer of personal data to third countries” of the Directive 95/46/EC, the data may be transferred to non EU countries or countries not belonging to the European Economic Area, that however grant an adequate level of protection of the personal data. In any case, the data processing will take place in accordance with the provisions of the current rules and regulations.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Banca Sella - Antufraud Services**

In accordance with the new EU Regulation UE 2016/679 on Data Protection (GDPR), the data may be transferred to non EU countries or countries not belonging to the European Economic Area, that however grant an adequate level of protection of the personal data. In any case, the data processing will take place in accordance with the provisions of the current rules and regulations.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Dynamic Yield**

We use the services of Dynamic Yield Ltd. With the personalization tool Dynamic Yield our website is optimized in order to make your website visit a personal experience through tailor-made recommendations and content. We use the page content you call up to recommend relevant content to you. Dynamic Yield collects pseudonymized information about your usage activities on our site. Cookies are used to store exclusively pseudonymized information under a randomly generated ID (pseudonym). A direct personal reference is therefore not possible. You can object to this recording at any time by clicking on this link and activating the opt-out (<https://www.dynamicyield.com/privacy-policy/#optinout>). An opt-out cookie is set to prevent the future collection of data from your visit to this website. Further information on Dynamic Yield: <https://www.dynamicyield.com/gdpr/>

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Selling goods and services online**

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by giglio.com depends on the payment system used.

- **Privacy Shield participation: data transfers from the EU to the United States**

The Owner participates in and complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the European Union to the United States. The Owner has certified to the Department of Commerce that it adheres to the Privacy Shield Principles.

If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view the Owner's certification, please visit <https://www.privacyshield.gov/> (or find the direct link to the certification list of Privacy Shield participants maintained by the Department of Commerce <https://www.privacyshield.gov/list>).

What does this mean for the European User?

The Owner is responsible for all processing of Personal Data it receives under the Privacy Shield Framework from European Union individuals and commits to subject the processed Personal Data to the Privacy Shield Principles.

This, most importantly, includes the right of individuals to access their personal data processed by the Owner.

The Owner also complies with the Privacy Shield Principles for all onward transfers of Personal Data from the EU, which means that it remains liable in cases of onward transfers to third parties.

With respect to Personal Data received or transferred pursuant to the Privacy Shield Framework, the Owner is subject to the investigatory and regulatory enforcement powers of the FTC, if not stated otherwise in this privacy policy.

The Owner is further required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Dispute resolution under the Privacy Shield

In compliance with the Privacy Shield Principles, the Owner commits to resolve complaints about its collection or use of the User's Personal Data. European Union individuals with inquiries or complaints regarding this Privacy Shield policy should first contact the Owner at the contact details supplied at the beginning of this document referring to "Privacy Shield" and expect the complaint to be dealt with within 45 days.

In case of failure by the Owner to provide a satisfactory or timely response, the User has the option of involving an independent dispute resolution body, free of charge.

In this regard, the Owner has agreed to cooperate with the panel established by the EU data protection authorities (DPAs) and comply with the advice given by the panel with regard to data transferred from the EU. The User may therefore contact the Owner at the email address provided at the beginning of this document in order to be directed to the relevant DPA contacts.

Under certain conditions – available for the User in full on the Privacy Shield website (<https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>) – the User may invoke binding arbitration when other dispute resolution procedures have been exhausted

- **Push notifications**

Giglio.com may send push notifications to the User.

- **iubenda Cookie Solution (remote consent Cookie)**

Remote iubenda consent Cookie (`_iub_cs-X`) is set by the iubenda Cookie Solution and stores User preferences related to Trackers under the `.iubenda.com` domain.

- **iubenda Cookie Solution (consent Cookie)**

iubenda consent Cookie (`_iub_cs-X`) is set by the iubenda Cookie Solution and stores User preferences related to Trackers in the local domain.

- **iubenda Consent Solution localStorage**

iubenda ConS JS library localStorage (`IUB_DATA`) temporarily stores pending data in a storage space internal to the User's browser (localStorage) until it's received by the API, then it is deleted.

- **iubenda CCPA Cookie (usprivacy)**

iubenda CCPA Cookie (`usprivacy`) is set by the iubenda Cookie Solution and stores California consumer opt-out choices in the local domain.

THE RIGHTS OF USERS

Users may exercise certain rights regarding their Data processed by the Owner.

Users entitled to broader protection standards may exercise any of the rights described below. In all other cases, Users may inquire with the Owner to find out which rights apply to them.

In particular, Users have the right to do the following, to the extent permitted by law:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Restrict the processing of their Data. Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.
-

DETAILS ABOUT THE RIGHT TO OBJECT TO PROCESSING

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

HOW TO EXERCISE THESE RIGHTS

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

APPLICABILITY OF BROADER PROTECTION STANDARDS

While most provisions of this document concern all Users, some provisions expressly only apply if the processing of Personal Data is subject to broader protection standards.

Such broader protection standards apply when the processing:

- is performed by an Owner based within the EU;
- concerns the Personal Data of Users who are in the EU and is related to the offering of paid or unpaid goods or services, to such Users;
- concerns the Personal Data of Users who are in the EU and allows the Owner to monitor such Users' behavior taking place in the EU.

COOKIE POLICY

Giglio.com uses Trackers. To learn more, the User may consult the [Cookie Policy](#).

ADDITIONAL INFORMATION ABOUT DATA COLLECTION AND PROCESSING

LEGAL ACTION

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of giglio.com or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

ADDITIONAL INFORMATION ABOUT USER'S PERSONAL DATA

In addition to the information contained in this privacy policy, giglio.com may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

SYSTEM LOGS AND MAINTENANCE

For operation and maintenance purposes, giglio.com and any third-party services may collect files that record interaction with giglio.com (System logs) or use other Personal Data (such as the IP Address) for this purpose.

INFORMATION NOT CONTAINED IN THIS POLICY

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

HOW "DO NOT TRACK" REQUESTS ARE HANDLED

Giglio.com does not support "Do Not Track" requests. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

CHANGES TO THIS PRIVACY POLICY

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within giglio.com and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

INFORMATION FOR CALIFORNIAN CONSUMERS

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running giglio.com and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The provisions contained in this section apply to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the state of California, United States of America, according to the "[California Consumer Privacy Act of 2018](#)" (the "CCPA"), as updated by the "California Privacy Rights Act" (the "CPRA") and subsequent regulations. For such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term "personal information" as defined in the California Consumer Privacy Act (CCPA/CPRA).

NOTICE AT COLLECTION

Categories of personal information collected, used, sold, or shared

In this section we summarize the categories of personal information that we've collected, used, sold, or shared and the purposes thereof. You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.

Information we collect: the categories of personal information we collect

We have collected the following categories of personal information about you: identifiers, internet information and geolocation data.

We do not collect sensitive personal information.

We will not collect additional categories of personal information without notifying you.

What are the purposes for which we use your personal information?

We may use your personal information to allow the operational functioning of giglio.com and features thereof ("business purposes"). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section "Detailed information on the processing of Personal Data" within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

How long do we keep your personal information?

Unless stated otherwise inside the "Detailed information on the processing of Personal Data" section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

How we collect information: what are the sources of the personal information we collect?

We collect the above-mentioned categories of personal information, either directly or indirectly, from you when you use giglio.com.

For example, you directly provide your personal information when you submit requests via any forms on giglio.com. You also provide personal information indirectly when you navigate giglio.com, as personal information about you is automatically observed and collected.

Finally, we may collect your personal information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

How we use the information we collect: disclosing of your personal information with third parties for a business purpose

For our purposes, the word "third party" means a person who is not any of the following: a service provider or a contractor, as defined by the CCPA.

We disclose your personal information with the third parties listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document. These third parties are grouped and categorized in accordance with the different purposes of processing.

Sale or sharing of your personal information

For our purposes, the word "sale" means any "selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer's personal information by the business to a third party, for monetary or other valuable consideration", as defined by the CCPA.

This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

For our purposes, the word "sharing" means any "sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged", as defined by the CCPA. Please note that the exchange of personal information with a service provider pursuant to a written contract that meets the requirements set by the CCPA, does not constitute a sale or sharing of your personal information.

Your right to opt out of the sale or sharing of your personal information and how you can exercise it

We sell or share your personal information with the third parties listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document. These third parties are grouped and categorized in accordance with the different purposes of processing. You have the right to opt out of the sale or sharing of your personal information. This means that whenever you request us to stop selling or sharing your personal information, we will abide by your request. Such requests can be made freely, at any time, without submitting any verifiable request. To fully exercise your right to opt out, you can contact us at any time using the contact details provided in this document. For a simplified opt-out method you can also use the privacy choices link provided on giglio.com.

If you want to submit requests to opt out of the sale or sharing of personal information via a user-enabled global privacy control, like the Global Privacy Control (“GPC”), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a [participating browser](#) or browser extension. More information about downloading GPC is available [here](#).

We use any personal information collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Once you have opted out, we are required to wait at least 12 months before asking whether you have changed your mind.

YOUR PRIVACY RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT AND HOW TO EXERCISE THEM

The right to access personal information: the right to know and to portability

You have the right to request that we disclose to you:

- the categories of personal information that we collect about you;
- the sources from which the personal information is collected;
- the purposes for which we use your information;
- to whom we disclose such information;
- the specific pieces of personal information we have collected about you.

You also have the right to know what personal information is sold or shared and to whom. In particular, you have the right to request two separate lists from us where we disclose:

- the categories of personal information that we sold or shared about you and the categories of third parties to whom the personal information was sold or shared;
- the categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

The disclosure described above will be limited to the personal information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be “portable”, i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance – provided that this is technically feasible.

The right to request the deletion of your personal information

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on giglio.com, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and notify any of our service providers and all third parties to whom we have sold or shared the personal information to do so – provided that this is technically feasible and doesn’t involve disproportionate effort.

The right to correct inaccurate personal information

You have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

The right to opt out of sale or sharing of personal information and to limit the use of your sensitive personal information

You have the right to opt out of the sale or sharing of your personal information. You also have the right to request that we limit our use or disclosure of your sensitive personal information.

The right of no retaliation following opt-out or exercise of other rights (the right to non-discrimination)

We will not discriminate against you for exercising your rights under the CCPA. This means that we will not discriminate against you, including, but not limited to, by denying goods or services, charging you a different price, or providing a different level or quality of goods or services just because you exercised your consumer privacy rights.

However, if you refuse to provide your personal information to us or ask us to delete or stop selling your personal information, and that personal information or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction.

To the extent permitted by the law, we may offer you promotions, discounts, and other deals in exchange for collecting, keeping, or selling your personal information, provided that the financial incentive offered is reasonably related to the value of your personal information.

How to exercise your rights

To exercise the rights described above, you need to submit your verifiable request to us by contacting us via the details provided in this document.

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will use any personal information collected from you in connection with the verification of your request solely for the purposes of verification and shall not further disclose the personal information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

If you are an adult, you can make a verifiable request on behalf of a minor under your parental authority.

You can submit a maximum number of 2 requests over a period of 12 months.

How and when we are expected to handle your request

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Our disclosure(s) will cover the preceding 12-month period. Only with regard to personal information collected on or after January 1, 2022, you have the right to request that we disclose information beyond the 12-month period, and we will provide them to you unless doing so proves impossible or would involve a disproportionate effort.

Should we deny your request, we will explain you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee, or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind it.

INFORMATION FOR VIRGINIA CONSUMERS

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The provisions contained in this section apply to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the Commonwealth of Virginia, according to the "[Virginia Consumer Data Protection Act](#)" (the "VCDPA"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the VCDPA.

CATEGORIES OF PERSONAL DATA PROCESSED

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.

Categories of personal data we collect

We have collected the following categories of personal data: identifiers, internet information and geolocation data

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

Why we process your personal data

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent. You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

How we use the data we collect: sharing of your personal data with third parties

We share your personal data with the third parties listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document. These third parties are grouped and categorized in accordance with the different purposes of processing. For our purposes, the word “third party” means “a natural or legal person, public authority, agency, or body other than the consumer, controller, processor, or an affiliate of the processor or the controller” as defined by the VCDPA.

Sale of your personal data

For our purposes, the word “sale” means any “exchange of personal data for monetary consideration by us to a third party” as defined by the VCDPA. Please note that according to the VCDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal information may be considered a sale under VCDPA.

Your right to opt out of the sale of your personal data and how you can exercise it

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

Processing of your personal data for targeted advertising

For our purposes, the word “targeted advertising” means “displaying advertisements to you where the advertisement is selected based on personal data obtained from your activities over time and across nonaffiliated websites or online applications to predict your preferences or interests” as defined by the VCDPA.

To find out more details on the processing of your personal data for targeted advertising purposes, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

YOUR PRIVACY RIGHTS UNDER THE VIRGINIA CONSUMER DATA PROTECTION ACT AND HOW TO EXERCISE THEM

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data: the right to know. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity — provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- non-discrimination. We will not discriminate against you for exercising your rights under the VCDPA. This means that we will not, among other things, deny goods or services, charge you a different price, or provide a different level or quality of goods or services just because you exercised your consumer privacy rights. However, if you refuse to provide your personal data to us or ask us to delete or stop selling your personal data, and that personal data or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction. To the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if you have exercised your right to opt out, or our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

How to exercise your rights

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relates to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a minor under your parental authority.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt.

Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 60 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to two requests per year. If your request is manifestly unfounded, excessive or repetitive, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

INFORMATION FOR COLORADO CONSUMERS

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running [giglio.com](#) and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The provisions contained in this section apply to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Colorado, according to the “Colorado Privacy Act” (the “CPA”), and, for such

consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term "personal data" as defined in the CPA.

CATEGORIES OF PERSONAL DATA PROCESSED

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.

Categories of personal data we collect

We have collected the following categories of personal data: identifiers, internet information and geolocation data
We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

Why we process your personal data

To find out why we process your personal data, you can read the sections titled "Detailed information on the processing of Personal Data" and "The purposes of processing" within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent. You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

How we use the data we collect: sharing of your personal data with third parties

We share your personal data with the third parties listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CPA.

Sale of your personal data

As specified in the "Detailed information on the processing of Personal Data" section of this document, our use of your personal data may be considered a sale under the CPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CPA.

Please note that according to the CPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale.

Your right to opt out of the sale of your personal data and how you can exercise it

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on giglio.com.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

Processing of your personal data for targeted advertising

As specified in the "Detailed information on the processing of Personal Data" section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CPA.

Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on giglio.com.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Universal opt-out mechanism: Global privacy control

If you want to submit frictionless requests to opt-out of the sale of personal data or the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control (“GPC”), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

YOUR PRIVACY RIGHTS UNDER THE COLORADO PRIVACY ACT AND HOW TO EXERCISE THEM

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

How to exercise your rights

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt.

Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may contact the Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to two requests per year.

INFORMATION FOR CONNECTICUT CONSUMERS

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running giglio.com and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The provisions contained in this section apply to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the State of Connecticut, according to "An Act Concerning Personal Data Privacy and Online Monitoring" (also known as "The Connecticut Data Privacy Act" or the "CTDPA"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term "personal data" as defined in the CTDPA.

CATEGORIES OF PERSONAL DATA PROCESSED

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.

Categories of personal data we collect

We have collected the following categories of personal data: identifiers, internet information and geolocation data

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

Why we process your personal data

To find out why we process your personal data, you can read the sections titled "Detailed information on the processing of Personal Data" and "The purposes of processing" within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent. You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

How we use the data we collect: sharing of your personal data with third parties

We share your personal data with the third parties listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CTDPA.

Sale of your personal data

As specified in the "Detailed information on the processing of Personal Data" section of this document, our use of your personal data may be considered a sale under the CTDPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CTDPA.

Please note that according to the CTDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale.

Your right to opt out of the sale of your personal data and how you can exercise it

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on giglio.com.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

Processing of your personal data for targeted advertising

As specified in the "Detailed information on the processing of Personal Data" section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CTDPA.

Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on giglio.com.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Universal opt-out mechanism: Global privacy control

If you want to submit frictionless requests to opt-out of the sale of personal data or the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

YOUR PRIVACY RIGHTS UNDER THE CONNECTICUT DATA PRIVACY ACT AND HOW TO EXERCISE THEM

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

How to exercise your rights

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt.

Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to

us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may contact the Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to one request per year.

INFORMATION FOR UTAH CONSUMERS

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running giglio.com and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The provisions contained in this section apply to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Utah, according to the “Consumer Privacy Act” (the “UCPA”), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the UCPA.

CATEGORIES OF PERSONAL DATA PROCESSED

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.

Categories of personal data we collect

We have collected the following categories of personal data: identifiers, internet information and geolocation data

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

Why we process your personal data

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

How we use the data we collect: sharing of your personal data with third parties

We share your personal data with the third parties listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word “third party” means “a person other than: the consumer, controller, or processor; or an affiliate or contractor of the controller or the processor” as defined by the UCPA.

Sale of your personal data

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the UCPA.

For our purposes, the word “sale”, “sell”, or “sold” means “the exchange of personal data for monetary or other valuable consideration by a controller to a third party” as defined by the UCPA.

Please note that according to the UCPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale.

Your right to opt out of the sale of your personal data and how you can exercise it

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on giglio.com.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

Processing of your personal data for targeted advertising

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by UCPA.

Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document. For a simplified opt-out method you can also use the privacy choices link provided on giglio.com.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

YOUR PRIVACY RIGHTS UNDER THE UTAH CONSUMER PRIVACY ACT AND HOW TO EXERCISE THEM

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising or the sale of personal data.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

How to exercise your rights

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

If you are an adult, you can make a request on behalf of a child under your parental authority.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt.

Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request.

We do not charge a fee to respond to your request, for up to one request per year.

INFORMATION FOR USERS RESIDING IN BRAZIL

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running giglio.com and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our"). The provisions contained in this section apply to all Users who reside in Brazil, according to the "Lei Geral de Proteção de Dados" (Users are referred to below, simply as "you", "your", "yours"). For such Users, these provisions supersede any other possibly divergent or conflicting provisions contained in

the privacy policy. This part of the document uses the term “personal information” as it is defined in the Lei Geral de Proteção de Dados (LGPD).

THE GROUNDS ON WHICH WE PROCESS YOUR PERSONAL INFORMATION

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

CATEGORIES OF PERSONAL INFORMATION PROCESSED

To find out what categories of your personal information are processed, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

WHY WE PROCESS YOUR PERSONAL INFORMATION

To find out why we process your personal information, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

YOUR BRAZILIAN PRIVACY RIGHTS, HOW TO FILE A REQUEST AND OUR RESPONSE TO YOUR REQUESTS

Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and

- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

How to file your request

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

How and when we will respond to your request

We will strive to promptly respond to your requests. In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an access or personal information processing confirmation request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form. You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead. In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a rectification, deletion, anonymization or personal information blocking request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request – except in cases where such communication is proven impossible or involves disproportionate effort on our side.

TRANSFER OF PERSONAL INFORMATION OUTSIDE OF BRAZIL PERMITTED BY THE LAW

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

DEFINITIONS AND LEGAL REFERENCES

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information – including a personal identification number – allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through giglio.com (or third-party services employed in giglio.com), which can include: the IP addresses or domain names of the computers utilized by the Users who use giglio.com, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using giglio.com who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

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, including the security measures concerning the operation and use of giglio.com. The Data Controller, unless otherwise specified, is the Owner of giglio.com.

giglio.com (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by giglio.com as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to giglio.com, if not stated otherwise within this document.

Latest update: March 28, 2023