

www.guestlight.it

privacy policy

This Application collects some Personal Data from its Users.

This document contains a section dedicated to Californian consumers and their privacy rights.

This document can be printed using the print command present in the settings of any browser.

Owner of the data treatment

JCG COMM via vecchia di Pozzolatico, 1 - 50125 Florence - Italy- p.i. 01789540471

Owner contact email: info@guestlight.it

Types of data collected

Among the Personal Data collected by this Application, independently or through interested parties, there are: Cookies; Usage data; e-mail; first name; surname; State; PAC; city; Address; business name.

Full details on each type of data collected are assigned in the sections dedicated to this privacy policy or through specific information texts assigned before the data are collected.

Personal Data may be freely assigned by the User or, in the case of Usage Data, collected automatically when using this Application.

Unless otherwise specified, all the Data requested by this Application are mandatory. If the User refuses to communicate, it may be impossible for this Application to provide the Service. In cases where this Application indicates some data as optional, Users are free to communicate with this Data, without needing any notification on the availability of the Service or on its operation.

Users who have doubts about which data are mandatory are encouraged to contact the owner.

Any use of Cookies - or other tracking tools - by this Application or by the owners of third party services provided by this Application, unless otherwise specified, has the function of supplying the Service requested by the User, in addition to the additional information described in this document and in the Cookie Policy, if available.

The User assumes responsibility for the Personal Data of third parties requested, sent or shared through this Application and guarantees that he has the right to communicate or disseminate them, freeing the Owner from any liability to third parties.

Method and place of processing the collected data

Method of treatment

The Data Controller adopts the appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data.

The treatment is carried out using IT and / or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Owner, in some cases, other subjects involved in the organization of this Application (administrative, commercial, marketing, legal,

system administrators) or external subjects (such as third party technical service providers, postal couriers, may have access to the Data). hosting provider, IT companies, communication agencies) also appointed, if necessary, Data Processors by the Owner. The updated list of Managers can always be requested from the Data Controller.

Legal basis of the treatment

The Data Controller processes Personal Data relating to the User if one of the following conditions exists:

-the User has given consent for one or more specific purposes; Note: in some systems, the Data Controller may be authorized to process Personal Data without the User's consent or another of the

legal bases specified below, as long as the User does not object ("opt-out"). to such treatment.

However, this is not applicable if the processing of Personal Data is regulated by European legislation on the protection of Personal Data;

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

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

-the processing is necessary for the performance of a public interest task or for the exercise of public powers with which the Data Controller is invested;
-the processing is necessary for the pursuit of the legitimate interest of the owner or third parties. However, it is always possible to request the Data Controller to clarify the concrete legal basis of each treatment and in particular to specify whether the treatment is based on the law, envisaged by a contract or necessary to conclude a contract.

Place

The Data are processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For more information, contact the owner.

The User's Personal Data may be transferred to a country other than the one in which the User is located. To obtain further information on the place of treatment, the User can refer to the section relating to the details on the processing of Personal Data.

The User has the right to obtain information regarding the legal basis for the transfer of Data outside

the European Union or to an international organization under public international law or consisting of

two or more countries, such as the UN, as well as regarding the security measures taken by the Data Controller to protect the Data.

The User can check whether one of the transfers described above takes place by examining the section of this document relating to the details on the processing of Personal Data or requesting information from the Data Controller by contacting him at the details indicated at the beginning.

Retention period

The data are processed and stored for the time required by the purposes for which they were collected.

Therefore:

Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of this contract is completed.

Personal data collected for purposes related to the legitimate interest of the owner will be retained until the satisfaction of this interest. The User can obtain further information regarding the legitimate

interest pursued by the Data Controller in the relevant sections of this document or by contacting the

Data Controller.

When the treatment is based on the User's consent, the Data Controller can keep the Personal Data

longer until such consent is revoked. In addition, the Data Controller may be obliged to keep

Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

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

PURPOSE OF THE PROCESSING OF THE COLLECTED DATA

User data are collected to allow the owner to provide the service, fulfill legal obligations, respond to requests or executive actions, protect their rights and interests (or those of users or third parties), identify any malicious activities or fraudulent, as well as for the following purposes: Interaction with external social networks and platforms, Contacting the User, Statistics, Displaying content from external platforms and Payment management.

To obtain detailed information on the purposes of the processing and on the Personal Data processed for each purpose, the User can refer to the "Details on the processing of Personal Data" section.

Details on the processing of Personal Data

Personal data are collected for the following purposes and using the following services:

Contact the user

Mailing list or newsletter (this Application)

By registering with the mailing list or the newsletter, the User's email address is automatically inserted in a list of contacts to which email messages containing information, including commercial

and promotional information, relating to this Application may be transmitted. The User's email address may also be added to this list as a result of registering with this Application or after making a purchase.

Personal Data processed: ZIP code; city; surname; e-mail; address; first name; business name; state.

Category of personal data collected pursuant to the CCPA: identifiers; commercial information.

Payment management

Unless otherwise specified, this Application processes all payments by credit card, bank transfer or other means through external payment service providers. In general, and unless otherwise indicated,

Users are asked to provide payment details and personal information directly to these payment service providers.

This Application is not involved in the collection and processing of such information: instead, it will only receive a notification from the payment service provider in question about the payment.

Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

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

Place of treatment: United States - Privacy Policy. Subject adhering to the Privacy Shield.

Category of personal data collected pursuant to the CCPA: information on the Internet.

Interaction with external social networks and platforms

This type of service allows you to interact with social networks, or with other external platforms, directly from the pages of this Application.

The interactions and information acquired by this Application are in any case subject to the User's privacy settings relating to each social network.

This type of service could still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to disconnect from the respective services to ensure that the data processed on this Application is not reconnected to the User's profile.

Like button and Facebook social widgets (Facebook Ireland Ltd)

The "Like" button and Facebook social widgets are interaction services with the Facebook social network, provided by Facebook Ireland Ltd

Personal Data processed: Cookies; Usage data.

Place of treatment: Ireland - Privacy Policy. Subject adhering to the Privacy Shield.

Category of personal data collected pursuant to the CCPA: information on the Internet.

This type of treatment constitutes a "sale of data" ("rooms") pursuant to the CCPA. In addition to the

information contained in this clause, the User can consult the section that describes the rights of Californian consumers, for information on how to opt-out from the sale.

PayPal button and widget (Paypal)

The PayPal button and widget are interaction services with the PayPal platform, provided by PayPal

Inc.

Personal Data processed: Cookies; Usage data.

Place of treatment: Consult the Paypal privacy policy - Privacy Policy.

Category of personal data collected pursuant to the CCPA: information on the Internet.

This type of treatment constitutes a "sale of data" ("rooms") pursuant to the CCPA. In addition to the

information contained in this clause, the User can consult the section that describes the rights of Californian consumers, for information on how to opt-out from the sale.

Statistics

The services contained in this section allow the Data Controller to monitor and analyze traffic data and are used to keep track of User behavior.

Google Analytics

Google Analytics is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on the position in which this Application is used, ("Google"). Google uses the Personal

Data collected for the purpose of tracking and examining the use of this Application, compiling reports and sharing them with other services developed by Google.

Google could use Personal Data to contextualize and personalize the advertisements of its advertising network.

Personal Data processed: Cookies; Usage data.

Place of treatment: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Person adhering to the Privacy Shield.

Category of personal data collected pursuant to the CCPA: information on the Internet.

This type of treatment constitutes a "sale of data" ("rooms") pursuant to the CCPA. In addition to the

information contained in this clause, the User can consult the section that describes the rights of Californian consumers, for information on how to opt-out from the sale.

Interaction with external social networks and platforms

This type of service allows you to interact with social networks, or with other external platforms, directly from the pages of this Application.

The interactions and information acquired by this Application are in any case subject to the User's privacy settings relating to each social network.

This type of service could still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to disconnect from the respective services to ensure that the data processed on this Application is not reconnected to the User's profile.

Viewing content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and to interact with them.

This type of service could still collect data on web traffic relating to the pages where the service is installed, even when users do not use it.

YouTube Video Widget (Google Ireland Limited)

YouTube is a video content viewing service managed by Google Ireland Limited that allows this Application to integrate such content within its pages.

Personal Data processed: Cookies; Usage data.

Place of treatment: Ireland - Privacy Policy. Subject adhering to the Privacy Shield.

Category of personal data collected pursuant to the CCPA: information on the Internet.

This type of treatment constitutes a "sale of data" ("rooms") pursuant to the CCPA. In addition to the

information contained in this clause, the User can consult the section that describes the rights of Californian consumers, for information on how to opt-out from the sale.

FURTHER INFORMATION ON PERSONAL DATA

Sale of goods and services online

The Personal Data collected is used for the provision of services to the User or for the sale of products, including payment and possible delivery. The Personal Data collected to complete the payment may be those relating to the credit card, the current account used for the transfer or other payment instruments provided. The payment data collected by this application depend on the payment system used.

USER RIGHTS

Users can exercise certain rights with reference to the data processed by the owner.

In particular, the User has the right to:

- **withdraw consent at any time.** The User can withdraw consent to the processing of their Personal Data previously expressed.

- **oppose the processing of their data.** The user can object to the processing of their data when it takes place on a legal basis other than consent. Further details on the right to object are indicated in the section below.

- **access their data.** The user has the right to obtain information on the data processed by the owner, on certain aspects of the processing and to receive a copy of the data processed.

- **verify and ask for rectification.** The User can verify the correctness of his Data and request

its updating or correction.

- obtain the limitation of the treatment. When certain conditions are met, the User can request the limitation of the processing of their Data. In this case the Data Controller will not process

the Data for any other purpose other than their conservation.

- obtain the cancellation or removal of your Personal Data. When certain conditions are

met, the User can request the cancellation of their Data by the Owner.

- receive your data or have it transferred to another holder. The User has the right to receive their Data in a structured format, commonly used and readable by an automatic device and,

where technically feasible, to obtain its transfer without obstacles to another owner. This provision is

applicable when the Data are processed with automated tools and the treatment is based on the User's consent, on a contract of which the User is a party or on contractual measures connected to it.

- propose a complaint. The User can lodge a complaint with the competent personal data protection authority or take legal action.

Details on the right to object

When Personal Data are processed in the public interest, in the exercise of public powers with which

the Data Controller is invested or to pursue a legitimate interest of the Data Controller, Users have the right to oppose the processing for reasons related to their particular situation.

Users are reminded that, if their data were processed for direct marketing purposes, they can oppose the processing without giving any reasons. To find out if the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

HOW TO EXERCISE YOUR RIGHTS

To exercise the rights of the User, Users can direct a request to the contact details of the Owner indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible, in any case within a month.

LEARN MORE ABOUT THE TREATMENT

Defense in court

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its possible establishment for the defense against abuse in the use of this Application or related Services by the User.

The User declares to be aware that the Data Controller may be obliged to disclose the Data by order

of the public authorities.

Specific information

At the request of the User, in addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

System log and maintenance

For needs related to operation and maintenance, this Application and any third party services used by it may collect system logs, i.e. files that record the interactions and which may also contain Personal Data, such as the User IP address.

Information not contained in this policy

Further information in relation to the processing of Personal Data may be requested at any time to the Data Controller using the contact details.

Reply to "Do Not Track" requests

This Application does not support "Do Not Track" requests.

To find out if any third-party services used support them, the User is invited to consult their respective privacy policies.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying it to Users on this page and, if possible, on this Application as well as, if technically and legally feasible, by sending a notification to Users through one of the extremes of contact he has. Please therefore consult this page frequently, referring to the date of the last modification indicated at the bottom.

If the changes concern treatments whose legal basis is consent, the Data Controller will collect the User's consent again, if necessary.

Information for Californian consumers

This part of the document integrates and completes the information contained in the rest of the privacy policy and is provided by the company that manages this Application and, if applicable, by its

parent company and by its subsidiaries and affiliates (for the purposes of this section collectively called "we" , "ours" or "ours").

The provisions contained in this section apply to all Users who are considered consumers residing in the state of California, United States of America, pursuant to the "California Consumer Privacy Act of

2018" (these Users are referred to below simply as "you ", " Your ", " you "or" your "), and, for them, these provisions prevail over any other provision that may diverge or in contrast contained in this privacy policy.

The term "personal information" is used in this part of the document as defined by the California Consumer Privacy Act (CCPA).

Categories of personal information collected, disclosed or sold

This section summarizes the categories of personal information that we have collected, communicated or "sold" pursuant to the CCPA and the related purposes of the processing. You can find detailed information on these activities in the section called "Details on the processing of Personal Data" in this document.

Information We Collect: The categories of personal information we collect

We have collected the following categories of personal information about you: identifiers, business information and information on the Internet.

We will not collect additional categories of personal information without first informing you of a new information.

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

We collect the aforementioned categories of personal information, directly or indirectly, from you when you use this Application.

For example, you directly provide us with your personal information when you send requests via any

form on this Application. In addition, you indirectly provide us with personal information when you browse this Application, as the personal information concerning you is automatically observed and collected. Finally, we may collect your personal information from third parties who work with us in relation to the provision of the Service or the functioning of this Application and its functionality.

How we use the information collected: sharing and communicating your personal

information with third parties for operational purposes.

We may communicate your personal information to third parties for operational and service purposes. In this case, we enter into a written contract with that third party which obliges the recipient of your personal information to keep this information confidential and not to use it for purposes other than those necessary for the execution of the contract.

We may also disclose your personal information to third parties when you ask us or authorize us to do so in order to provide you with our Service.

For more information on the purposes of the processing, please consult the relevant section of this document.

Selling your personal information

For the purposes of this document, the term "sale" means "sell, assign, release, make public, disclose, disseminate, make available, transfer or otherwise communicate orally, in writing or by electronic means, a consumer's personal information by a company to another company or to third parties, for consideration or drawing another type of profit".

This means that, for example, a sale can take place whenever an application publishes advertisements, performs statistical analysis on its traffic or views or, simply, uses tools such as social network plug-ins and similar tools.

Your right to opt out of the sale of your personal information

You have the right to opt out of the sale of your personal information. This means that every time you

ask us not to sell your data, we will execute your request.

These requests can be made freely, at any time, and without submitting any request subject to verification, simply by following the instructions below.

Instructions for opting out of the sale of personal information

If you wish to have further information or exercise your right to opt-out in relation to all sales made by

this Application, both online and offline, you can contact us using the contact details provided in this

document.

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

We may use your personal information to allow the correct functioning of this Application and its functionalities ("operational purposes"). In such cases, your personal information will be processed in

an adequate and proportionate way for the purposes for which it was originally collected and strictly

within the limits of compatible purposes.

We may also use your personal information for other reasons, such as for commercial purposes (as

indicated in the "Details on the processing of Personal Data" section in this document), as well as to

respect the law and defend our rights. before the competent authorities when our rights or interests are threatened or when we suffer damage.

We will not use your personal information for different, unrelated or incompatible purposes, without first communicating a new information to you.

Your California privacy rights and how to exercise them

Right to knowledge and portability

You have the right to know the following:

the categories of personal information we collect about you and the sources of that information, the purposes for which we use your personal information and with whom we share it;

in case of sale or communication of personal information to third parties for operational purposes, we

will provide you with two separate lists in which we will communicate to you:

for sale, the categories of personal information communicated to each category of recipients; is

for communication to third parties for operational purposes, the categories of personal information obtained from each category of recipients;

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

In the event that our response is provided electronically, the information it contains will be "portable",

that is, delivered in a compatible format so as to allow you to transmit the information to other entities

without hindrance - provided that this is technically feasible.

RIGHT TO REQUEST THE DELETION OF YOUR PERSONAL INFORMATION

You have the right to request the cancellation of any of your personal information, subject to the exceptions provided by law (such as, by way of example and not exhaustively, in the event that the information is used to identify and repair errors on this Application, to detect accidents security, for

purposes of protection from fraudulent or illegal activities, to exercise certain rights etc.).

If no exceptions provided for by law apply, following the exercise of your right, we will delete your personal information and ask our suppliers to do the same.

How to exercise your rights

To exercise the rights described above, it is necessary to submit a verifiable request by contacting us

using the contact details provided in this document.

In order to respond to your request, it is necessary for us to be able to identify you. For this you can

exercise the above rights only by submitting a verifiable request that must:

provide sufficient information to allow us to reasonably verify that you are the person to whom the personal information we have collected relate to or an authorized representative;

describe your request with a degree of detail that is sufficient to make us understand, evaluate and respond correctly to what you ask us.

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

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

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

A maximum of 2 requests can be submitted within 12 months.

How and how long we will handle your request

Within 10 days, we will confirm that we have received your request and provide you with information

on how we will process it.

We will respond on the merit of the request within 45 days of receiving it. If we need more time, we will explain the reason and tell you how long we need. In this regard, please note that it may take up

to 90 days to satisfy your request.

Our communications will cover the period of the previous 12 months.

If we were to deny your request, we will explain the reason for the refusal.

We will not charge any commission to process or respond to your verifiable request unless it is manifestly unfounded or excessive. In such cases, we may charge a reasonable commission, or deny the request. In both cases, we will notify you of our decisions and explain the reasons.

Definitions and legal references

Personal Data (or Data)

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

Usage data

These are the information collected automatically through this Application (also from third party applications integrated into this Application), including: IP addresses or domain names of the computers used by the User who connects with this Application, addresses in URI notation (Uniform

Resource Identifier), the time of the request, the method used to forward the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response from

the server (successful, error, etc.) country of origin, the characteristics of the browser and operating

system used by the visitor, the various temporal connotations of the visit (for example the time spent

on each page) and the details of the itinerary followed within the Application, with particular reference

the sequence of pages consulted, the parameters relating to the operating system and the User's IT

environment.

User

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

Interested

The natural person to whom the Personal Data refers.

Data Processor (or Responsible)

The natural person, legal entity, public administration and any other entity that processes personal data on behalf of the Data Controller, as set out in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, service or other body which, individually or together with

others, determines the purposes and means of the processing of personal data and the tools adopted, including the security measures relating to the operation and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application.

This Application

The hardware or software tool through which Users' Personal Data is collected and processed.

Service

The service provided by this application as defined in the relative terms (if any) on this site / application.

European Union (or EU)

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

Cookie

Small portion of data stored within the User's device.

Legal references

This privacy statement is drawn up on the basis of multiple legislative systems, including articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy statement only concerns this Application. Last modified: July 24, 2020 JCG COMM via vecchia di Pozzolatico, 1 - 50125 Firenze - Italy