

## Privacy and Cookie Policy of <http://www.palladium-group.com/>

This domain is owned by KIRON S.A.R.L., the manager is Mario Luigi MARTINO. The owner of this website is KIRON S.A.R.L., part of Palladium Group.

Kiron S.A.R.L., in accordance with regulations on protection of personal data adopted in the national territory, intends to ensure the privacy and security of personal data of each user/visitor, even when the Internet is accessed from abroad. This page is intended to describe the management of this site owned by Kiron S.A.R.L., concerning the processing of personal data of users/visitors who consult it.

This privacy policy is provided in accordance with regards on data protection, and it applies exclusively to this website. It does not include websites that are linked to this website. Links to other websites are marked as such. Please note that we have no control over or responsibility for other websites; hence, this data-privacy policy does not apply to any other websites. This application collects some Personal Data of its Users.

### Data Controller and Owner

Data controller and owner is Kiron S.A.R.L. 10, rue la Vacquerie - 75011 Paris. [eeig@palladium-group.com](mailto:eeig@palladium-group.com)

This website is hosted by Boraso.com srl con socio unico, Viale Abruzzi, 79-20131 Milano

### Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Usage data and Cookie.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection. The Personal Data may be freely provided by the User, or collected automatically when using this Application.

Any use of Cookies - or of other tracking tools - by this Application or by the owners of third party services used by this Application, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User. Failure to provide certain Personal Data may make it impossible for this Application to provide its services. Users are responsible for any Personal Data of third parties obtained, published or shared through this Application 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 Data Controller processes the Data of Users in a proper manner and shall take 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 Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (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 Data Controller at any time.

## Place

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

## Retention time

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

## The use of the collected Data

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Contact form and Analytics. The Personal Data used for each purpose is outlined in the specific sections of this document.

## Detailed information on the processing of Personal Data

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

### RSS feed management

These services allow this Application to manage RSS feeds and the distribution of their content. Depending on the characteristics of the service used, these services may be used to insert ads within the content and to gather statistics data from them.

#### Feedburner (Google Inc.)

Feedburner is a service to manage RSS feeds provided by Google Inc. It allows the collection of statistics on what content is consumed and to insert ads in it.

Personal Data collected: Cookie and Usage data.

Place of processing: USA – Privacy Policy (<http://www.google.com/intl/en/policies/privacy/>)

### 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 Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Application, 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 collected: Cookie and Usage data.

Place of processing: USA – Privacy Policy <http://www.google.com/intl/en/policies/privacy/>

Type of cookies used: “\_ga”, “\_gat”, UA-2902106-34” and “UA-3803360-1”; “\_\_utma”; “\_\_utmb”; “\_\_utmc” “\_\_utmt”; “\_\_utmt\_secondTracker” “\_\_utmz”.

To provide website visitors the ability to prevent their data from being used by Google Analytics, you can download and install the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js), available at this link: <https://tools.google.com/dlpage/gaoptout?hl=en>

## Cookie Policy

This application uses Cookies. A cookie is a small text file containing a unique identification number that is transferred from the website to the hard drive of your computer through an anonymous code that can identify the computer but not the user and passively monitor your activities on the website.

Cookies are small text files that are sent to the user's terminal equipment by visited websites; they are stored in the user's terminal equipment to be then re-transmitted to the websites on the user's subsequent visits to those websites. They are used for several purposes, they have different features and may be used both by the owner of the website you are now navigating and by other websites ("third party" cookies). As shown below you will find all the information on cookies stored by this website as well as all the information you need to manage your cookie preferences.

## Technical Cookies and statistical aggregate

### Activities strictly necessary for the functioning

This application uses cookies to save User session and to perform other activities that are strictly necessary for the functioning of the same, for example in relation to the distribution of traffic. The cookies used are session and therefore temporary.

### Rescue activities preferences, optimization and statistics

This application uses cookies to save your browsing preferences and optimize the browsing experience User. Among these cookies includes, for example, the ones to set the language or for the management of statistics by the owner of the site. All technical cookies do not require consent, therefore, are installed automatically as a result of access to the site.

### Other types of cookies or third-party tools that might make use

Some of the services listed below may not require the consent or may be managed directly by the owner - depending on how described - without the help of third parties.

If among the instruments mentioned below were present services operated by third parties, these may - in addition to what is specified and also the knowledge of the owner - making activity tracking User. For detailed information, please consult the privacy policy of the services listed.

## **How can I manage the installation of cookies?**

In addition to what is specified in this document, the User can manage preferences for Cookies directly from within their own browser and prevent – for example – third parties from installing them. Through the browser preferences, it is also possible to delete Cookies installed in the past, including the Cookies that might possibly have saved the consent for the installation of Cookies by this website. It is important to note that by disabling all Cookies, the functioning of this site may be compromised. Users can find information about how to manage Cookies in their browser at the following addresses:

- Google Chrome: [https://support.google.com/chrome/answer/95647?hl=en&p=cpn\\_cookies](https://support.google.com/chrome/answer/95647?hl=en&p=cpn_cookies),
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>,
- Apple Safari: [https://support.apple.com/kb/PH19214?viewlocale=en\\_US&locale=en\\_US](https://support.apple.com/kb/PH19214?viewlocale=en_US&locale=en_US),
- Microsoft Windows Explorer: <http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies>.

In the case of services provided by third parties, Users can exercise their right to withdraw from the tracking activity by utilizing the information provided in the third party's privacy policy, by clicking the opt-out link – if provided – or by contacting the third party.

Notwithstanding the above, the Owner informs that Users may take advantage of: Your Online Choices. This service allows Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of this resource in addition to the information provided in this document.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services. The User declares to be aware that the Data Controller 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, this Application 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, this Application and any third party services may collect files that record interaction with this Application (System Logs) or use for this purpose other Personal Data (such as IP Address).

## **Information not contained in this policy**

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

## **The rights of Users**

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Application 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 Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller removes the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

## **Information about this privacy policy**

The Data Controller is responsible for this privacy policy.

## **Definitions and legal references**

### **Personal Data (or Data)**

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

## Usage Data

Information collected automatically from this Application (or third party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, 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 this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refers.

## Data Subject

The legal or natural person to whom the Personal Data refers.

## Data Processor (or Data Supervisor)

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

## Data Controller (or Owner)

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning 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 by which the Personal Data of the User is collected.

## Cookie

Small piece of data stored in the User's device.

## Legal information

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations under Art. 10 of EC Directive n. 95/46/EC, and under the provisions of Directive 2002/58/EC, as revised by Directive 2009/136/EC, on the subject of Cookies.

This privacy policy relates solely to this Application.

March 2016