

PRIVACY POLICY

Liberty Stables Società Sportiva Dilettantistica a r.l., as Data Controller, wishes to provide the following information regarding the management of its website (<https://www.libertystables.it>) with reference to the processing of personal data of users who visit it. This notice is also provided pursuant to Article 13 of Regulation (EU) 2016/679 ("**GDPR**" or the "**Regulation**").

LEGAL REFERENCES

- Directive 2002/58/EC concerning the processing of personal data and the protection of privacy in the electronic communications sector;
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation);
- Legislative Decree No. 196 of 30 June 2003 ("*Personal Data Protection Code*"), as amended by Legislative Decree No. 101 of 10 August 2018.

DATA CONTROLLER

The Data Controller is Liberty Stables Società Sportiva Dilettantistica a r.l., with registered office in Verona, st. Antonio Locatelli n. 20, email address contactus@libertystables.it.

PLACE OF DATA PROCESSING

Processing activities related to the web services of this website are carried out at the aforementioned premises of the Data Controller and at the premises of third parties specifically appointed as Data Processors pursuant to Article 28 GDPR, which provide outsourced services.

TYPES OF DATA PROCESSED

Navigation Data

The IT systems and software procedures used to operate this website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified data subjects; however, due to its nature, it may allow users to be identified through processing and association with data held by third parties.

This category includes IP addresses or domain names of computers used by users connecting to the website, URI (Uniform Resource Identifier) addresses of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server response (successful, error, etc.), and other parameters relating to the user's operating system and IT environment.

These data are used solely to obtain anonymous statistical information regarding website usage and to ensure its proper functioning, and are deleted immediately after processing. Such data may be used to ascertain liability in the event of hypothetical cybercrimes against the website.

Data Voluntarily Provided by the User

The optional, explicit, and voluntary sending of personal data by the user through the contact details (email address and telephone number) published on the website results in the subsequent acquisition of the data provided by the sender, which are necessary to respond to requests for information.

Anonymous or Aggregated Data

Anonymization is a processing activity aimed at preventing the identification of the data subject. Anonymous data do not fall within the scope of data protection legislation. Aggregated data may derive from personal data provided by users but are not considered personal data because they do not allow, either directly or indirectly, the identification of the data subject.

COOKIES

This website uses only technical cookies, which are necessary for navigation and without which the website would not function properly.

PURPOSES AND LEGAL BASIS OF PROCESSING

Personal data will be processed for the following purposes:

- (i) To allow navigation and consultation of the website.
The legal basis for processing is the consent manifestly given through the consultation of the website (Article 6(1)(a) GDPR).
- (ii) To respond to users' requests addressed to the Data Controller through the contact details (email address and telephone number) published on the website.
The legal basis for processing is the consent manifestly expressed through the submission of the request (Article 6(1)(a) GDPR).
- (iii) Defensive purposes in the event of misuse of the website or attempted fraud.
The legal basis for processing is the legitimate interest of the Data Controller (Article 6(1)(f) GDPR).

LINKS TO OTHER WEBSITES

This website may contain links or references to access other websites. Please note that the Data Controller does not control the cookies or other tracking technologies used by such websites, to which this Privacy Policy does not apply. Therefore, users are encouraged to consult the privacy policies of those websites.

OPTIONAL NATURE OF DATA PROVISION

Apart from navigation data (which are necessary for the proper functioning of the website), users are free to provide their personal data. However, failure to provide such data may result in the inability to obtain the requested information.

CONTROL OVER PERSONAL DATA

Users may, at any time, choose to limit the collection or use of their personal data. The Company will not sell or distribute collected personal data to third parties unless it has obtained the explicit and freely given consent of the data subjects or unless required by law.

PROCESSING METHODS AND DATA RETENTION PERIOD

Personal data are processed using automated tools for the time strictly necessary to achieve the purposes for which they were collected.

In particular, with regard to information requests, data are retained for the period necessary to provide a response to the user. Any complaints may be retained for a longer period where necessary for the Data Controller to defend its rights.

SHARING, DISCLOSURE AND DISSEMINATION OF DATA

Collected data may be transferred or disclosed to other companies specifically appointed as Data Processors for activities strictly related to the purposes indicated above and instrumental to the operation of the service, such as website management. Outside these cases, personal data will not be disclosed or made available to anyone unless authorized by the data subjects. Personal data may be transferred to

third parties only if: a) explicit consent has been given to share the data with third parties; b) it is necessary to share information with third parties in order to provide the requested service; c) such disclosure is necessary to comply with requests from Judicial Authorities or Public Security Authorities. No data derived from the website are subject to dissemination.

TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

Personal data will not be transferred to Third Countries, meaning countries outside the European Union or the European Economic Area. Should such a transfer occur, the Data Controller declares and guarantees compliance with Articles 44 et seq. of the GDPR.

DATA SUBJECTS' RIGHTS

Data protection legislation expressly grants certain rights to individuals whose personal data are processed (the "data subjects"). In particular, pursuant to Articles 15 et seq. of Regulation (EU) 2016/679, each data subject has the right to obtain confirmation as to whether personal data concerning them are being processed and, where that is the case, to obtain access to the personal data, rectification, erasure, restriction of processing, data portability, and to object to processing. To exercise the rights listed above, users may contact the Data Controller by sending a registered letter with return receipt to the address indicated above or by email to contactus@libertystables.it.

RIGHT TO LODGE A COMPLAINT

Data subjects who believe that the processing of personal data relating to them carried out through this website infringes the GDPR have the right to lodge a complaint with the competent Supervisory Authority, as provided for by Article 77 of the GDPR.

CHANGES TO THIS PRIVACY POLICY

The Data Controller periodically reviews its privacy and security policy and, where necessary, updates it in accordance with regulatory, organizational, or technological developments. In the event of amendments, the updated version will be published on this page of the website.