

Site Privacy Policy

Data controller

Studio Fazzini Holzmilller & Partners

Milan - Via Pisani 28 - 20124 (Italy)

Florence - Via Garibaldi 15 - 50123 (Italy)

Owner's email address: info@fhpadvisory.com

Studio Fazzini Holzmilller & Partners is an unrecognized cultural association established by two historical firms to develop functional synergies to broaden their respective professional skills and ensure the highest professional preparation standards.

Types of data collected

Personal data collected by this application, either independently or through third parties, include: cookies; usage data; email; the number of users; city; device information; session statistics; latitude (of the city); longitude (of the city); browser information.

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

Personal data may be freely provided by the user or, in the case of usage data, automatically collected during the use of this application.

Unless otherwise specified, all Data requested by this application are mandatory. If the user refuses to provide them, it may be impossible for this application to provide the service. In case this application indicates certain data as optional, users are free not to communicate such data, without consequences on the service.

Users who should have doubts about which data are mandatory are encouraged to contact the data controller. The possible use of cookies - or other tracking tools - by this application or the owners of third-party services used by this application, where not otherwise specified, has the purpose of providing the service requested by the user, in addition to the further purposes described in this document and in the cookie policy, if available.

The user assumes responsibility for the personal data of third parties obtained, published, or shared through this application and warrants that he/she has the right to communicate or disclose it, absolving the owner of any liability to third parties.

Method and place of processing of collected Data

Methods of processing

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

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The processing is carried out by computer and/or telematic tools, with methods and logic strictly related to the purposes indicated. In addition to the Data Controller, other subjects involved in the organization of this Application (administrative, sales, marketing, legal or system administrators personnel) or external subjects (such as third-party technical service providers, postal couriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, Data Processors by the Data Controller may have access to the Data. The updated list of Data Processors can always be requested from the Data Controller.

Legal basis for the treatment

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

- the User has given consent for one or more specific purposes. Note: in some jurisdictions, the Controller may be authorized to process Personal Data without the need for the User's consent or another of the legal bases specified below, as long as the User does not object ("opt-out") to such processing. However, this does not apply if the processing of Personal Data;
- personal Data is regulated by European legislation on the protection of Personal Data;
- the treatment is necessary for the execution of a contract with the User and/or for the execution of pre-contractual measures;
- the treatment is necessary to comply with a legal obligation to which the Data Controller is subject;
- the treatment is necessary for the performance of a task carried out in the public interest in the exercise of the public powers vested in the Owner;
- the treatment is necessary for the pursuit of the legitimate interests of the Owner or third parties.

However, it is always possible to ask the Data Controller to clarify the legal basis of each treatment and, in particular, to specify whether the processing is based on the law, required by a contract or necessary to conclude a contract.

Location

The Data are processed at the Controller's operational offices and at any other location where the parties involved in the processing are located. For more information, please contact the Data Controller. The User's Personal Data may be transferred to a country other than the country in which the User is located. To obtain more information about the location of the treatment, the User may refer to the section on Personal Data treatment details.

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 may verify whether any of the transfers just described takes place by reviewing the section of this document on details of the processing of Personal Data or request information from the Data Controller by contacting it at the contact details given at the beginning.

Storage period

Data are treated and kept for the time required by the purposes for which they were collected. Therefore:

- personal Data collected related to the performance of a contract between the Data Controller and the User will be retained until the execution of that contract is completed;
- personal Data collected related to the legitimate interest of the Data Controller will be retained until such interest is satisfied. The User may obtain further information regarding the legitimate interest pursued by the Controller in the relevant sections of this document or by contacting the Controller.

When treatment is based on the User's consent, the Data Controller may retain Personal Data for a longer period until such consent is revoked. In addition, the Controller may be obliged to store Personal Data for a longer period in compliance with a legal obligation or by order of an authority. At the end of the storage period, the Personal Data will be deleted. Therefore, at the expiration of this period, the right of access, deletion, rectification and the right to Data portability can no longer be exercised.

Purposes of the collected Data

The User Data is collected to enable the Data Controller to provide the Service, comply with legal obligations, respond to requests or enforcement actions, protect its rights and interests (or those of Users or third parties), detect any malicious or fraudulent activities, as well as for: Viewing content from external platforms, Statistics, managing addresses and sending email messages, and Hosting and back-end infrastructure.

To obtain detailed information for the processing and the Personal Data processed, the User may refer to the section "Personal Data Processing Details".

Details of the treatment of Personal Data

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

Managing addresses and sending email messages

These types of services enable the management of a database of email contacts, telephone contacts, or contacts of any other type used to communicate with the User. These services may also allow for the gathering of data related to the date and time of the User's viewing of messages, as well as the User's interaction with them, such as information about clicks on links included in messages.

Amazon Simple Email Service (Amazon)

Amazon Simple Email Service is an address management and email messaging service provided by Amazon.com Inc.

Personal data processed: email.

Place of processing: USA - [Privacy Policy](#).

Hosting and backend infrastructure

These types of services have the function of hosting Data and files that allow this Application to function, enable its distribution, and provide a ready-made infrastructure to deliver specific functionality of this Application.

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

Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc. Personal Data processed: various types of Data as specified by the Privacy Policy of the service.

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

Statistics

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

Google Tag Manager

Google Tag Manager is a statistics service provided by Google Inc.

Personal Data Processed: Cookies; Usage Data.

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

Google Analytics 4

Google Analytics is a statistics service provided by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data, ("Google"). Google uses the Personal Data collected to track and examine the use of this Application, to compile reports and share them with other services developed by Google.

Google may use Personal Data to contextualize and personalize ads in its ad network.

In Google Analytics 4, IP addresses are used at the time of collection and then delete before the data is recorded in any data center or server.

To learn more, you can consult [Google's official documentation](#).

Personal Data Processed: city; Usage Data; browser information; device information; latitude (of the city); longitude (of the city); the number of Users; session statistics; Tracking Tools.

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

Displaying content from external platforms

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

In case that a service of this type is installed, it is possible that, even if Users do not use the service, it may collect traffic data related to the pages where it is installed.

Google Maps Widget

Google Maps is a map display service operated by Google Inc. that allows this Application to integrate such content within its pages.

Personal Data Processed: Cookies; Usage Data.

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

Google Fonts

Google Fonts is a font-style display service operated by Google LLC or Google Ireland Limited, depending on how the Data Controller manages the processing of the Data, which allows this Application to integrate such content within its pages.

Personal Data processed: Usage Data; various types of Data as specified by the Privacy Policy of the service.

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

User Rights

Users may exercise certain rights to the Data processed by the Data Controller.

In particular, the User has the right to:

- **revoke consent at any time.** The User may revoke the consent to the treatment of its Personal Data previously expressed;
- **object to the treatment of their Personal Data.** The User may object to the processing of their Personal Data when it is done on a legal basis other than consent. Further details on the right to object are provided in the section below;
- **access to your own Data.** You have the right to obtain information about the Data processed by the Owner, about certain aspects of the processing and to receive a copy of the Data processed;
- **verify and request rectification.** The User may verify the correctness of its Data and request their update or correction;
- **obtain the restriction of treatment.** When certain conditions are met, the User may request the limitation of the processing of their Data. In this case, the Data Controller will not process the Data for any purpose other than their preservation;
- **obtain the deletion or removal of their Personal Data.** When certain conditions are met, the User may request the deletion of their Data by the Data Controller;
- **receive their Data to be transferred to another Data Controller.** The User has the right to receive their Data in a structured, commonly used, machine-readable format and, where technically feasible, to have it transferred unimpeded to another Data Controller. This provision is applicable when the Data is processed by automated means and the processing is based on the User's consent, a contract to which the User is a party or contractual measures related to it;
- **propose a complaint.** The User may propose a complaint to the supervisory authority for the protection of competent personal data or take legal action.

Details of the right to object

When Personal Data are processed in the public interest, in the exercise of public authority vested in the Data Controller or in pursuit of a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons related to their particular situation.

Users should note that if their Data were processed for direct marketing purposes, they may object to the processing without providing any reasons. To find out whether the Data Controller processes Data for direct marketing purposes, Users may refer to the respective sections of this document.

How to Exercise rights to exercise the User's rights

Users may address a request to the contact details of the Controller indicated in this document. Requests are filed free of charge and processed by the Controller as soon as possible, in any case within one month.

Additional information on treatment

Defense in court

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

The User declares that he/she is aware that the Data Controller may be obliged to disclose the Data by order of public authorities.

Specific disclosures

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

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services it uses may collect system logs, i.e., files that record interactions and may also contain Personal Data, such as the User's IP address.

Information not contained in this policy

Further information with the processing of Personal Data may be requested at any time from the Data Controller using the contact details.

Responding to "Do Not Track" Requests

This Application does not support "Do Not Track" requests. To find out whether any third-party services used support them, the User is encouraged 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 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 contact details it has. Therefore, please consult this page frequently, referring to the date of the last modification indicated at the bottom. If the changes affect processing whose legal basis is consent, the Controller will collect the User's consent again, if necessary.

Definitions and legal references

Personal Data

Personal Data is any information that, directly or indirectly, including in connection with any other information, including a personal identification number, makes a natural person identified or identifiable.

Usage Data

This is the information collected automatically through this Application (including by third-party applications integrated into this Application), including: the IP addresses or domain names of the computers used by the User who connects with this Application, the addresses in URI (Uniform Resource Identifier) notation, the time of the request, the method used in forwarding the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc..) the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (e.g. the length of time spent on each page) and the details of the itinerary followed within the Application, with particular reference to the sequence of pages consulted, the parameters relating to the User's operating system and computer environment.

User

The individual using this Application who, except where otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data controller (or Processor)

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

The natural or legal person, public authority, service or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data and the instruments 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 by which User's Personal Data are collected and processed.

Service

The Service provided by this Application as defined in the relevant terms (if any) on this site/application.

European Union (or EU)

Unless otherwise specified, any reference to the European Union in this document shall be deemed to extend to all current member states of the European Union and the European Economic Area.

Cookies

Cookies are Tracking Tools that consist of small portions of data stored within the User's browser.

Tracking Tool

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

Legal references

This privacy policy is written based on multiple legislative orders, including Articles 13 and 14 of Regulation (EU) 2016/679. Unless otherwise specified, this privacy policy covers this Application only.