#### PRIVACY POLICY

This website privacy policy describes how Daley Hub protects and makes use of the information you give the company when you use this website.

If you are asked to provide information when using this website, it will only be used in the ways described in this privacy policy.

This policy is updated from time to time. The latest version is published on this page.

This website privacy policy was updated on: 21.09.2020 (previously 25/04/2018)

If you have any questions about this policy, please email <a href="mailto:theteam@daleyhub.com">theteam@daleyhub.com</a>

#### INTRODUCTION

This website gathers and uses Personal Data from its Users in order to provide products and services and to enable certain functions on this website.

We also collect information to better understand how visitors use this website and to present timely, relevant information to them.

## WHAT DATA WE GATHER

We may collect the following information:

- Name, job title and company name
- Contact information including email address and telephone number
- Demographic information, such as postcode, preferences and interests
- Website usage data
- Other information relevant to client enquiries
- Other information pertaining to special offers and surveys

#### **HOW WE USE THIS DATA**

Collecting this data helps us understand what you are looking from the company, enabling us to deliver improved products and services.

Specifically, we may use data:

- To improve the products and services we provide.
- To contact you in response to a specific enquiry.

## **TYPES OF DATA COLLECTED**

Among the types of Personal Data that this website collects, by itself or through third parties, there are: Cookies, Usage Data, Name, Company Name and Email Address.

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.

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

Users are free not to communicate Data without any consequences on 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 this website or by the owners of third-party services used by this website 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 this website 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 unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organisational 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: Analytics, Contacting the User, Displaying content from external platforms, Interaction with data collection platforms and other third parties, Interaction with external social networks and platforms, Managing contacts and sending messages, SPAM protection and Platform services and hosting.

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:

# ANALYTICS

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

## GOOGLE ANALYTICS (GOOGLE INC.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilises the Data collected to track and examine the use of this website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy – Opt Out

CONTACTING THE USER

CONTACT FORM (THIS WEBSITE)

By filling in the contact form with their Data, the User authorises this Website 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 which may be collected: Name, Company Name, Email Address.

#### DISPLAYING CONTENT FROM EXTERNAL PLATFORMS

This type of service allows you to view content hosted on external platforms directly from the pages of this Website 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

# • 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 this Website 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.

Place of processing: USA – Privacy Policy

## • 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 this Website.

The interaction and information obtained through this Website 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.

# 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 collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy

# LINKEDIN BUTTON AND SOCIAL WIDGETS (LINKEDIN CORPORATION)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – Privacy Policy

## YOUTUBE BUTTON AND SOCIAL WIDGETS (GOOGLE INC.)

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – <u>Privacy Policy</u>

## PLATFORM SERVICES AND HOSTING

These services have the purpose of hosting and running key components of this Website, therefore allowing the provision of this Website from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

## Wix.COM

Wix.com is a platform that allows the Owner to build, run and host this Website.

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

Place of processing: USA – <u>Privacy Policy</u> **COOKIE POLICY** 

This Application uses Cookies.

Cookies are small pieces of information that are stored by your browser on your computer's hard drive.

Wix uses cookies for important reasons, such as:

- To provide a great experience for your visitors and customers.
- To identify your registered members (users who registered to your site).

- To monitor and analyze the performance, operation and effectiveness of Wix's platform.
- To ensure our platform is secure and safe to use.

more information on cookies please visit Wix privacy policy above or visit the following link to ICO info. (We are not responsible for information available on this link):

https://ico.org.uk/for-the-public/online/cookies/

## **CONTROLLING INFORMATION ABOUT YOU**

When you fill in a form or provide your details on our website, we will never lease, distribute or sell your personal information to third parties unless we have your permission or the law requires us to.

Any personal information we hold about you is stored and processed under our data protection policy, in line with the Data Protection Act 1998.

## **SECURITY**

We will always hold your information securely.

To prevent unauthorised disclosure or access to your information, we have implemented strong physical and electronic security safeguards.

We also follow stringent procedures to ensure we work with all personal data in line with the Data Protection Act 1998.

#### LINKS FROM OUR SITE

Our website may contain links to other websites.

Please note that we have no control of websites outside the [domain name] domain. If you provide information to a website to which we link, we are not responsible for its protection and privacy.

Always be wary when submitting data to websites. Read the site's data protection and privacy policies fully.

## 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 website 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 website 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 website and any third-party services may collect files that record interaction with this website (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 website does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honour 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 website and can request that the Data Controller remove 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 website (or third-party services employed in this website), which can include: the IP addresses or domain names of the computers utilised by the Users who use this website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised 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 utilised by the User, the various time details per visit (e.g., the time spent on each page within the website) and the details about the path followed within the website 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 website, which must coincide with or be authorised 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 organisation authorised 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 organisation 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 website. The Data Controller, unless otherwise specified, is the Owner of this website.

## THIS WEBSITE

The hardware or software tool by which the Personal Data of the User is collected.

#### COOKIES

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

## **LEGAL INFORMATION**

Notice to European Users: this privacy statement has been prepared in fulfilment 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 Website.