

# PETRICCA&CO

## Privacy & Cookies Policy

### Privacy Policy

This privacy policy on the processing of Personal Data is provided to the user of the website, accessible electronically through the following address: [www.petriccacapital.com](http://www.petriccacapital.com) in accordance with the provisions contained in Articles 13 and 14 of EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, hereinafter "GDPR").

### Data Controller

The address of the website is <https://petriccacapital.com/> (hereinafter referred to as the "Site") and the data controller is **Petricca & Co Capital S.A. - Registered Office: Boulevard Royal, 28, L-2449 Luxembourg, Luxembourg - E-mail: stefano.petricca@petriccacapital.com**, (hereinafter referred to as the "Data Controller") and can be contacted via the above e-mail address. This Site respects and protects the confidentiality of its visitors and users, making every possible and proportionate effort not to infringe any rights of users. This privacy policy applies exclusively to the online activities of this Site and is valid for visitors/users of the Site.

It does not apply to information that may be collected through channels other than this Site that may be consulted by the User, through links, banners or other hypertext links on the Site itself.

The purpose of the privacy policy is to provide maximum transparency regarding the information that the Site collects and how it uses it.

### Legal basis of processing

This Site processes data on the basis of user's consent. By using or consulting this Site, visitors and users explicitly approve this privacy policy and consent to the processing of their personal data in relation to the methods and purposes described below, including possible disclosure to third parties if necessary for the provision of a service. The provision of data and therefore consent to the collection and processing of data is optional, the user may deny consent, and may revoke at any time a consent already provided through a specific email addressed to the email address of the Data Controller. However, denying consent may make it impossible to provide the services and the site navigation experience would be compromised.

### Data collected and purpose

Like all websites, this Site makes use of log files in which information collected automatically during user visits is stored. The information collected may be as follows:

- internet protocol (IP) address;
- browser type and parameters of the device used to connect to the site;
- name of the internet service provider (ISP);
- date and time of the visit;
- web page of origin of the visitor (referral) and exit;
- country of origin;
- number of clicks, if any.

# PETRICCA&CO

Data and information are collected for the following purposes:

- in an exclusively aggregated and anonymous form in order to verify the correct functioning of the Site. None of this information is related to the physical person-user of the Site, and does not allow in any way their identification (since May 25, 2018, when the GDPR came into force, this information is processed according to the legitimate interests of the owner);
- for security purposes (spam filters, firewalls, virus detection), the automatically recorded data may possibly also include personal data such as the IP address, which could be used, in accordance with applicable laws, in order to block attempts to damage the site itself or cause damage to other users, or otherwise harmful or criminal activities. Such data is never used for the identification or profiling of the user, nor crossed with other data, nor provided to third parties, but used only for the purpose of protecting the site and its users (from May 25, 2018, the date of entry into force of the GDPR, such information is processed according to the legitimate interests of the owner);
- communicate the data to third parties who perform functions necessary or instrumental to the operation of the service.

## **Data collection**

The data collected by the Site during its operation are used exclusively for the purposes indicated above and kept for the time strictly necessary to carry out the activities specified. In any case, the personal data collected by the Site will never be provided to third parties, for any reason, unless it is a legitimate request by the judicial authorities and only in the cases provided for by law. The data, however, may be provided to third parties if this is necessary for the provision of a specific service requested by the user, or to perform security checks or optimization of the site.

## **Data processor**

The data collected by the Site are processed at the registered office of the Data Controller. The person responsible for personal data is Stefano Petricca (e-mail [stefano.petricca@petriccacapital.com](mailto:stefano.petricca@petriccacapital.com)).

## **Third Party Websites**

Please note that, should the Site contain links to the websites of third parties, the Data Controller cannot exercise any control over the content of such websites nor has any access to the personal data of the users visiting them. The owners of the aforementioned websites will therefore remain the sole and exclusive owners and managers of the processing of the personal data of their users, and the Data Controller will remain extraneous to this activity as well as to any liability, prejudice or cost that may arise from its failure or improper performance. It is therefore advisable to carefully read the relevant privacy policies and terms of use of such websites before providing or consenting to the processing of your personal data.

## **Users Rights**

The user will have the right to exercise the rights under Articles 15-21 GDPR. In particular, the user has the right at any time to obtain from the Data Controller, confirmation of the existence or otherwise of personal data concerning him, even if not yet recorded, and their communication in intelligible form.

1) The user also has the right to obtain confirmation on:

# PETRICCA&CO

- a) the origin of the personal data;
- b) the purposes and methods of processing;
- c) the logic applied in case of processing carried out with the aid of automated tools;
- d) the identity of the Data Controller, Data Processor and the designated representative;
- e) the subjects or categories of persons to whom the data may be communicated or who can learn about them as appointed representative in the State, managers or agents.

2) The user is also entitled to obtain:

- a) the updating, rectification or, when interested, integration of data;
- b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

3) The user has the right to object, in whole or in part:

- a) for legitimate reasons to the processing of personal data concerning him, even if pertinent to the purpose of collection;
- b) to the processing of personal data concerning him for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication.

4) Where applicable, the user also has the rights under Articles 16-21 GDPR

- a) Right to rectification,
- b) Right to be forgotten,
- c) Right to restriction of processing,
- d) Right to portability of contractual and raw navigation data,
- e) Right to object,
- f) Right to complain to the Guarantor Authority,
- g) Right of revocation.

The above rights may be exercised in relation to the Data Controller by contacting the references described above.

The exercise of your rights as a data subject is free of charge pursuant to Article 12 GDPR.

However, in the case of requests that are manifestly unfounded or excessive, including due to their repetitiveness, the Data Controller may charge you a reasonable expense contribution, in light of the administrative costs incurred in handling the request, or deny satisfaction of your request.

## Cookie Policy

This information on the use of cookies (hereinafter "**Cookie Policy**") is provided to the user of the site, accessible electronically through the following address: [www.petriccacapital.com](http://www.petriccacapital.com) , in accordance with Articles 13 and 14 of EU Regulation 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

The Cookie Policy is provided only for this Site and not for other websites that may be consulted by the user through banners or other hypertext links on the Site.

# PETRICCA&CO

You are hereby informed that this Site does not use first party cookies (as defined below) and does not store your information.

## What are cookies

Cookies are small data files that the websites that use them automatically send to the user's **terminal** (hereinafter referred to as "**Terminal**"), usually to the browser, where they are stored and then transmitted to the websites the next time the same user visits (the so-called **first party cookies**).

While browsing the Site, the user may also receive on his/her terminal device cookies from different sites or web servers (the so-called **third-party cookies**).

Cookies may be limited in duration to a single browsing session on the browser (the so-called **session cookies**) and are automatically deactivated when the user closes the browser.

Cookies can have a predetermined expiry date and, in this case, they will remain stored and active on the user's hard disk until the expiry date, continuing to collect information during different browsing sessions on the browser (the so-called **permanent cookies**).

Cookies are used for different functions. Some are necessary to allow the user to navigate the website and take advantage of its functions (the so-called **technical cookies**). Others are used to obtain statistical information, in aggregate or not, on the number of users accessing the relative site and on how the site itself is used (the so-called **analytics cookies**). Finally, others are used to draw up a profile of the user as a consumer and allow the display of advertisements on the relative website, as they are consistent with the user's tastes and consumption habits (the so-called **profiling cookies**).

## Third Party Websites and Services

The Site may contain links to other web sites that have their own privacy policies that may be different from those adopted by us and therefore this site is not responsible for these third party sites.

We provide below a (non-exhaustive) list of some of the partner companies that may use cookies while you are browsing this site.

### Google Maps (Google Inc.)

Google Maps is a map viewing service operated by Google Inc. which allows this application to integrate such content into its pages.

Place of processing: USA - Privacy Policy

## How to disable cookies via your browser

### How to disable cookies by configuring your Chrome browser

Run the Chrome Browser

Click on the menu in the browser toolbar next to the url entry window for navigation

Select Settings

Click Show Advanced Settings

In the "Privacy" section click on the "Content settings" button

In the "Cookies" section you can change the following cookie settings:

Allow data to be saved locally

Change local data only until the browser is closed

Prevent sites from setting cookies

Blocking third-party cookies and site data

Manage exceptions for some websites

Delete one or all cookies

# PETRICCA&CO

For more information visit the dedicated page.

## Mozilla Firefox

Run the Mozilla Firefox Browser

Click on the menu in the browser toolbar next to the url entry window for navigation

Select Options

Select the Privacy panel

Click Show Advanced Settings

In the "Privacy" section click on the "Content settings" button

In the "Tracking" section you can change the following cookie settings:

Require sites not to do any tracking

Notify sites of willingness to be tracked

Do not communicate any preferences regarding the tracking of personal data

From the "History" section you can:

By enabling "Use custom settings" select to accept third-party cookies (always, from the most visited sites or never) and keep them for a specified period (until they expire, when you close Firefox or ask every time)

Remove individual stored cookies

For more information visit the dedicated page.

## Internet Explorer

Run the Internet Explorer Browser

Click the Tools button and choose Internet Options

Click on the Privacy tab and in the Settings section change the slider to the desired cookie action:

Block all cookies

Allow all cookies

Selecting which sites to get cookies from - move the cursor to an intermediate position so that you do not block or allow all cookies, then press Sites, in the Website Address box enter a website and then press Block or Allow

For more information visit the dedicated page.

## Safari

Run the Safari Browser

Click on Safari, select Preferences and click on Privacy

In the Block Cookies section, specify how Safari should accept cookies from websites.

To see which web sites have stored cookies click on Details

For more information visit the dedicated page. Safari iOS (mobile devices)

Run the iOS Safari Browser

Tap on Settings and then Safari

Tap on Block Cookies and choose from the options: "Never", "Third-party and advertisers" or "Always".

To clear all cookies stored by Safari, tap on Settings, then Safari, then Clear Cookies and Data.

For more information visit the dedicated page.

## Opera

Run the Opera Browser

Click on Preferences, then Advanced and then Cookie.

Select one of the following options:

Accept all cookies

Accept cookies only from the site you are visiting - third party cookies and cookies that are sent from a domain other than the one you are visiting will be rejected

# PETRICCA&CO

Never accept cookies: all cookies will never be saved  
For more information visit the dedicated page.

## **How to disable cookies from third-party services**

Google: <https://www.google.com/policies>