

# Privacy Policy of pinossandwiches.com

This Application collects some Personal Data from its Users.

## Data Controller

Salumeria Verdi S.n.c. di Palmiero Giuseppe & C. - Via Giuseppe Verdi 36r, 50122 Firenze (FI)

**Email:** info@pinossandwiches.com

## Types of Data Collected

Among the types of Personal Data that this Application collects, either independently or through third parties, are: first name; last name; phone number; email; country; postal code; date of birth; city; physical address; Usage Data.

Full details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanatory texts displayed prior to Data collection. Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically during the use of this Application.

Unless otherwise specified, all Data requested by this Application is mandatory. If the User refuses to provide the Data, it may be impossible for this Application to provide the Service. In cases where this Application specifically states that certain Data is optional, Users are free to refrain from communicating such Data without consequences to the availability or functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are encouraged to contact the Data Controller.

The possible use of Cookies—or other tracking tools—by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service requested by the User, in addition to any other purposes described in this document and in the Cookie Policy.

The User is responsible for any third-party Personal Data obtained, published, or shared through this Application.

## Methods and Location of Data Processing

### Processing Methods

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

Data processing is carried out using IT and/or telematic tools, following organizational procedures and methods strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to specific persons involved with the operation of this Application (such as administrative, sales, marketing, legal, or system administration staff) or external parties (e.g., third-party technical service providers, mail carriers, hosting providers, IT companies, communication agencies) appointed as Data Processors by the Data Controller, if necessary. The updated list of these parties can be requested from the Data Controller at any time.

### Location

Data is processed at the operating offices of the Data Controller and in any other location where the parties involved in the processing are located. For more information, contact the Data Controller. The User's Personal Data may be transferred to a country other than the one where the User is located. To

obtain further details about the place of processing, the User can refer to the section detailing the processing of Personal Data.

### **Data Retention Period**

Unless otherwise specified in this document, Personal Data is processed and stored for as long as required by the purpose for which it was collected and may be retained for a longer period due to legal obligations or based on the User's consent.

### **Purpose of Data Processing**

User Data is collected to allow the Data Controller to provide the Service, comply with legal obligations, respond to requests or enforcement actions, protect its own rights and interests (or those of Users or third parties), identify malicious or fraudulent activities, and for the following purposes: contacting the User, traffic optimization and distribution, and infrastructure monitoring. For detailed information about the purposes of processing and the Personal Data used for each purpose, the User can refer to the section “Details on the Processing of Personal Data.”

### **Details on the Processing of Personal Data**

#### **Contacting the User**

- **Contact Form (This Application)**

By filling in the contact form with their Data, the User consents to its use to respond to information requests, quotes, or any other kind of request as indicated by the form's header.

**Personal Data processed:** last name; email; first name; phone number.

**Category of Personal Information collected under the CCPA:** identifiers.

- **Mailing List or Newsletter (This Application)**

By registering to the mailing list or newsletter, the User's email address is automatically added to a contact list to receive email messages containing information, including of a commercial or promotional nature, related to this Application. The User's email address may also be added to this list as a result of registering for this Application or after making a purchase.

**Personal Data processed:** postal code; city; last name; date of birth; email; physical address; country; first name; phone number.

**Category of Personal Information collected under the CCPA:** identifiers.

#### **Infrastructure Monitoring**

This type of service allows this Application to monitor the use and behavior of its components to improve performance and functionality, maintain operations, or troubleshoot issues. The Personal Data processed depends on the characteristics and implementation of these services, which naturally filter activity on this Application.

- **Sentry (Functional Software, Inc.)**

Sentry is a monitoring service provided by Functional Software, Inc. **Personal Data processed:** various types of Data as specified in the privacy policy of the service.

**Processing location:** United States – [Privacy Policy](#).

**Category of Personal Information collected under the CCPA:** identifiers.

#### **Traffic Optimization and Distribution**

This type of service allows this Application to distribute its content through geographically distributed servers and to optimize its performance. The Personal Data processed depends on the characteristics and implementation of these services, which naturally filter communications between this Application and the

User's browser. Due to the distributed nature of this system, it is difficult to determine the locations to which content containing User Personal Data may be transferred.

- **Google Cloud CDN (Google LLC)**

Google Cloud CDN is a traffic optimization and distribution service provided by Google LLC.

**Personal Data processed:** Usage Data.

**Processing location:** United States – [Privacy Policy](#).

**Category of Personal Information collected under the CCPA:** information related to internet or other network activities.

## Cookie Policy

This Application uses Tracking Tools. For more details, Users can refer to the Cookie Policy.

### Additional Information for Users

#### Legal Basis for Processing

The Data Controller processes Personal Data relating to the User if one of the following conditions applies:

- The User has given consent for one or more specific purposes.
- The processing is necessary for the performance of a contract with the User and/or for pre-contractual measures.
- The processing is necessary to comply with a legal obligation to which the Data Controller is subject.
- The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.
- The processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by third parties.

Users may always request the Data Controller to clarify the specific legal basis applicable to each processing activity, especially if the processing is based on legal requirements, contractual obligations, or necessary for contract completion.

#### Additional Information on Retention Periods

Unless otherwise specified in this document, Personal Data is processed and stored for the time necessary to fulfill the purpose for which it was collected and may be retained for a longer period due to legal obligations or based on the User's consent.

Specifically:

- Personal Data collected for purposes related to the execution of a contract between the Data Controller and the User will be retained until the contract has been fully performed.
- Personal Data collected for purposes related to the legitimate interests of the Data Controller will be retained until such interests are fulfilled. Users may obtain additional information about the legitimate interests pursued by the Data Controller in the relevant sections of this document or by contacting the Data Controller.

If processing is based on the User's consent, the Data Controller may retain Personal Data for a longer period until the consent is withdrawn. Additionally, the Data Controller may be obliged to retain Personal Data for a longer period in compliance with legal obligations or upon order of an authority.

At the end of the retention period, Personal Data will be deleted. As a result, the right to access, delete, rectify, and data portability can no longer be exercised after this period.

## User Rights Under the General Data Protection Regulation (GDPR)

Users have certain rights concerning their Data processed by the Data Controller. Specifically, within the limits set by law, Users have the right to:

- **Withdraw consent at any time.** Users can withdraw their previously given consent to the processing of their Personal Data.
- **Object to the processing of their Data.** Users can object to the processing of their Data when it is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to obtain information about the Data processed by the Data Controller, certain aspects of the processing, and receive a copy of the Data being processed.
- **Verify and request rectification.** Users can verify the accuracy of their Data and request updates or corrections.
- **Obtain the restriction of processing.** Users can request the restriction of the processing of their Data. In this case, the Data Controller will process the Data only for storage purposes.
- **Obtain the deletion or removal of their Personal Data.** Users can request the deletion of their Data by the Data Controller.
- **Receive their Data or have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used, and machine-readable format and, where technically feasible, to have it transferred to another controller without any hindrance.
- **Lodge a complaint.** Users can lodge a complaint with their local data protection authority or pursue legal action.

Users have the right to obtain information about the legal basis for Data transfers to a foreign country, including any international organization governed by international law or composed of two or more countries (e.g., the United Nations), and the security measures adopted by the Data Controller to protect their Data.

### Details on the Right to Object

When Personal Data is processed for public interest purposes, in the exercise of official authority, or for the purposes of the legitimate interests pursued by the Data Controller, Users can object to the processing for reasons related to their particular situation.

Users are reminded that if their Data is processed for direct marketing purposes, they may object to the processing at any time, free of charge, and without providing any justification. Should Users object to processing for direct marketing purposes, their Personal Data will no longer be processed for these purposes. To find out whether the Data Controller processes Data for direct marketing purposes, Users can refer to the respective sections of this document.

### How to Exercise Rights

To exercise their rights, Users can send a request to the contact details of the Data Controller specified in this document. Requests are free of charge, and the Data Controller will respond as promptly as possible, within one month at the latest, providing all legally required information. Any rectifications, deletions, or restrictions of processing will be communicated by the Data Controller to each recipient, if any, to whom Personal Data has been disclosed, unless this proves impossible or involves disproportionate effort. The Data Controller will inform the User of such recipients if requested.

## Further information for Users in the United States

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The information contained in this section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information.

## Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

*While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.*

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## Identifiers

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## Internet or other electronic network activity information

¶ You can read the definitions of these concepts inside the [“Definitions and legal references section”](#) of the privacy policy.

To know more about your rights you can refer to the [“Your privacy rights under US state laws”](#) section of our privacy policy.

For more details on the collection of Personal Information, please read the section [“Detailed information on the processing of Personal Data”](#) of our privacy policy.

We won't process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

## What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use this Application.

For example, you directly provide your Personal Information when you submit requests via any forms on this Application. You also provide Personal Information indirectly when you navigate this Application, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

## Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- **the right to request the deletion of your Personal Information.** You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;
- **the right to opt out from the Sale of your Personal Information;** We will not discriminate against you for exercising your privacy rights.
- **the right to non-discrimination.**

## Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- **The right to opt out of the Sharing of your Personal Information** for cross-context behavioral advertising;

- **The right to request to limit our use or disclosure of your Sensitive Personal Information** to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

### **Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon and Montana**

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas and Oregon, you have

- **The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- **The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

### **Additional rights for users residing in Utah**

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah, you have

- **The right to opt out of** the processing of your Personal Information for **Targeted Advertising**;
- **The right to opt out of the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

### **How to exercise your privacy rights under US state laws**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

### **How to exercise your rights to opt out**

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on this Application.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request in a frictionless manner.

### **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

## **Further Information on Processing**

## **Defense in Legal Proceedings**

The User's Personal Data may be used by the Data Controller in legal proceedings or in the preparatory stages of such proceedings for the defense against abuse in the use of this Application or related Services by the User.

The User declares to be aware that the Data Controller may be required to disclose the Data upon orders from public authorities.

## **Specific Information**

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

## **System Logs and Maintenance**

For operational and maintenance purposes, this Application and any third-party services used may collect system logs—files that record interactions and may include Personal Data, such as the User's IP address.

## **Information Not Contained in This Policy**

Further information regarding the processing of Personal Data can be requested from the Data Controller at any time using the contact details provided.

## **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, within this Application, as well as—where technically and legally feasible—sending a notification to Users via any contact information available. Users are strongly encouraged to check this page often, referring to the date of the last modification indicated at the bottom. If the changes affect processing activities based on the User's consent, the Data Controller will collect new consent from the User, if necessary.

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## **Definitions and Legal References**

### **Personal Data (or Data) / Personal Information (or Information)**

Any information that directly or indirectly, including in connection with any other information, such as a personal identification number, allows the identification or identifiability of a natural person.

### **Sensitive Personal Information**

Sensitive Personal Information refers to any Personal Information that is not publicly available and that reveals information considered sensitive under applicable privacy laws.

### **Usage Data**

Information collected automatically through this Application (or third-party applications integrated into this Application), including: IP addresses or domain names of the computers used by the User connecting with this Application, Uniform Resource Identifier (URI) addresses, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numeric code indicating the server response status (successful, error, etc.), the country of origin, browser and operating system characteristics used by the visitor, the various time details per visit (e.g., the time spent on each page), and the details of the path followed within the Application, with particular reference to the sequence of pages consulted, the parameters related to the User's operating system and IT environment.

### **User**

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

**Data Subject**

The natural person to whom the Personal Data refers.

**Data Processor (or Processor)**

A natural or legal person, public authority, agency, or other body that processes Personal Data on behalf of the Data Controller, as described in this privacy policy.

**Data Controller (or Controller)**

The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. Unless otherwise specified, the Data Controller is the owner of this Application.

**This Application**

The hardware or software tool by which the Personal Data of Users is collected and processed.

**Service**

The service provided by this Application as described in the relative terms (if available) on this website/application.

**Sale**

Sale means any exchange of Personal Information by the Owner to a third party for monetary or other valuable consideration, as defined under applicable U.S. state privacy laws. Please note that the exchange of Personal Information with a service provider under a written contract that meets the requirements set forth by applicable law does not constitute a Sale of your Personal Information.

**Sharing**

Sharing means any disclosure, transfer, dissemination, or communication of Personal Information by the company to a third party for cross-context behavioral advertising, whether for monetary or other valuable consideration, as defined by California privacy laws. Note that sharing of Personal Information with a service provider under a contract that complies with California privacy laws does not constitute Sharing.

**Targeted Advertising**

Targeted Advertising refers to the display of advertisements to a consumer selected based on Personal Information obtained from that consumer's activities over time across non-affiliated websites or online applications, to predict the consumer's preferences or interests, as defined by applicable U.S. state privacy laws.

**European Union (or EU)**

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

**Legal References**

This privacy policy has been prepared based on multiple legislative systems. Unless otherwise stated, this privacy policy applies exclusively to this Application.

*Latest update: July 23, 2024*