

# Privacy Policy

## PRIVACY POLICY OF WWW.ANTICAPESA.COM

This Website collects some Personal Data from its Users.

### DATA CONTROLLER

GESTRI Gestione Ristoranti Srl - Via Garibaldi, 18 - 00153 Rome (Italy)

**Email address of the Owner:** info@anticapesa.it

### TYPES OF DATA COLLECTED

Among the Personal Information collected from this site, either independently or through third parties, there are: Cookies, Usage data, name, surname, email, various types of Data and sex.

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 are collected.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically during the use of this site.

Unless otherwise specified, all the data requested by this site are mandatory. If the User refuses to communicate them, it may be impossible for this site to provide the Service. In cases where this site indicates some Data as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or on its operation.

Users who have doubts about which data are mandatory, are encouraged to contact the owner.

Any use of cookies - or other tracking tools - by this site or third party service providers used by this site, unless otherwise specified, is intended to provide the Service requested by the User, in addition to the additional purposes described in this document and in the Cookie Policy, if available.

The User assumes the responsibility of the Personal Data of third parties obtained, published or shared through this site and guarantees to have the right to communicate or disseminate them, freeing the owner from any liability to third parties.

### MODE AND PLACE OF PROCESSING OF COLLECTED DATA

#### Method of treatment

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

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

## **Legal basis of the processing**

The Holder processes Personal Data relating to the User in the event one of the following conditions exists:

- the User has given consent for one or more specific purposes; Note: in some jurisdictions the Owner may be authorized to process Personal Data without the User's consent or another of the legal bases specified below, as long as the User does not object ("opt-out") to this treatment. However, this is not applicable if the processing of Personal Data is regulated by European legislation regarding the protection of Personal Data;
- the processing is necessary for the execution of a contract with the User and / or the execution of pre-contractual measures;
- the processing is necessary to fulfill 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 for the exercise of public authority vested in the Holder;
- the processing is necessary for the pursuit of the legitimate interest of the owner or third parties.

In any case, it is always possible to ask the Owner to clarify the concrete legal basis of each treatment and in particular to specify whether the treatment is based on the law, provided for by a contract or necessary to conclude a contract.

## **Place**

The Data is processed at the Data Controller's premises, in the data centers where this Site is physically installed (located in Italy, the United Kingdom, the Netherlands, or in other EU countries) and in the places where the third parties listed in the section operate. "Details on the processing of Personal Data". For more information, contact the owner.

The User's Personal Data may be transferred to a country other than that in which the User is located. To obtain further information on the processing site, the User can refer to the section concerning the processing of Personal Data. You have the right to obtain information regarding the legal basis for the transfer of Data outside the European Union or to an international organization of 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. If one of the transfers described above takes place, the User can refer to the respective sections of this document or request information from the Data Controller by contacting him at the opening dates.

## **Retention period**

The Data are processed and stored for the time required by the purposes for which they were collected. Therefore:

- Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of the contract is completed.
- Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until such interest is met. The User can obtain further information regarding the legitimate interest pursued by the Owner in the relevant sections of this document or by contacting the Data Controller.

When the processing is based on the consent of the User, the Data Controller may retain the Personal Data for a longer period until such consent is revoked. Furthermore, the Data Controller may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or an order of an authority.

At the end of the retention period the Personal Data will be deleted. Therefore, at the end of this term the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

## **PURPOSES OF THE PROCESSING OF COLLECTED DATA**

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Advertising, Analytics, Contacting the User, Management of payments, Interaction with social networks and external platforms, Remarketing and behavioral targeting, Performance and content performance testing (A / B testing), Displaying content from external platforms, SPAM protection, Tag management, Managing contacts and sending messages and Content comment.

To obtain further detailed information on the purposes of the processing and on the Personal Data concretely relevant to each purpose, the User can refer to the relevant sections of this document.

## **DETAILS ON THE PROCESSING OF PERSONAL DATA**

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

### **Comment on the contents**

The comment services allow Users to formulate and make public their comments regarding the content of this site. Users, according to the settings decided by the Owner, can leave the comment also anonymously. In the case of Personal Data issued by the User there is an email, this could be used to send notifications of comments regarding the same content. Users are responsible for the content of their comments. In the event that a comment service provided by third parties is installed, it is possible that, even if the Users do not use the comment service, the same collect traffic data relating to the pages in which the comment service is installed. .

### **Comment system managed directly (this site)**

This Site has its own comment system of contents.

Personal Data collected: surname, Cookie, email address and first name.

### **Disqus (Disqus)**

Disqus is a content commenting service provided by Big Heads Labs Inc.

Personal Data collected: Cookies, Usage Data and various types of Data as specified in the privacy policy of the service.

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

### **Contact the user**

#### **Contact form (this site)**

By filling out the contact form with their Data, the User consents to their use to respond to requests for information, quotes, or any other kind indicated by the form header.

Personal Data collected: surname, email address, first name and various types of Data.

#### **Curriculum vitae submission form (this site)**

The User, by filling in his / her Data with the form of sending the curriculum vitae and attaching the curriculum itself, consents to the use of the Data and the curriculum to allow the evaluation of his / her application to the job position indicated in the form.

Personal Data collected: surname, email address, name and various types of Data, including those included in the curriculum vitae.

### **Mailing list or newsletter (this site)**

By registering with the mailing list or the newsletter, the User's email address is automatically added to a list of contacts to which email messages containing information, including commercial and promotional information, relating to this site may be transmitted. The User's email address could also be added to this list as a result of registering with this site or after making a purchase.

Personal Data collected: email, name and gender.

### **Manage contacts and send messages**

This type of service allows you to manage a database of email contacts, telephone contacts or contacts of any other type, used to communicate with the User.

These services may also allow us to collect data relating to the date and time the messages are displayed by the User, as well as to the User's interaction with them, such as information on clicks on the links inserted in the messages.

### **MailUp (MailUp)**

MailUp is a service for managing addresses and sending email messages provided by MailUp SpA

Personal Data collected: email.

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

### **MailChimp (The Rocket Science Group, LLC.)**

MailChimp is an address management and email message service provided by The Rocket Science Group, LLC.

Personal Data collected: surname, email address and first name.

Place of processing: United States - [Privacy Policy](#) . Person adhering to the Privacy Shield.

### **Payment management**

The payment management services allow this site to process payments by credit card, bank transfer or other instruments. The data used for payment are acquired directly by the payment service provider requested without being in any way processed by this site.

Some of these services may also allow the sending of messages to the User, such as emails containing invoices or notifications regarding payment.

### **PayPal (Paypal)**

PayPal is a payment service provided by PayPal Inc., which allows the User to make payments online.

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

Place of processing: Consult the Paypal privacy policy - [Privacy Policy](#) .

### **Tag management**

This type of services is functional to the centralized management of the tags or scripts used on this site.

The use of these services involves the flow of User Data through them and, if necessary, their retention.

### **Google Tag Manager (Google LLC)**

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) . Person adhering to the Privacy Shield.

### **Interaction with social networks and external platforms**

This type of service allows you to make interactions with social networks, or other external platforms, directly from the pages of this site.

The interactions and information acquired from this site are in any case subject to the User's privacy settings related to each social network.

If an interaction service with social networks is installed, it is possible that, even if the Users do not use the service, the same collect traffic data relating to the pages in which it is installed.

### **Like button and Facebook social widgets (Facebook, Inc.)**

The "Like" button and Facebook social widgets are services of interaction with the social network Facebook, provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) . Person adhering to the Privacy Shield.

### **Tweet button and Twitter social widgets (Twitter, Inc.)**

The Tweet button and Twitter social widgets are services of interaction with the Twitter social network, provided by Twitter, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) . Person adhering to the Privacy Shield.

### **"Pin it" button and Pinterest social widgets (Pinterest)**

The "Pin it" button and Pinterest social widgets are services of interaction with the Pinterest platform, provided by Pinterest Inc.

Personal Data collected: Cookies and Usage Data.

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

### **Protection from SPAM**

This type of services analyzes the traffic of this site, potentially containing Personal Data of Users, in order to filter it from parts of traffic, messages and contents recognized as SPAM.

#### **Google reCAPTCHA (Google Inc.)**

Google reCAPTCHA is a SPAM protection service provided by Google Inc.

Use of the reCAPTCHA system is subject to Google's [privacy policy](#) and [terms of use](#) .

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) . Person adhering to the Privacy Shield.

### **Advertising**

This type of services allow you to use the User Data for commercial communication purposes in various forms of advertising, such as the banner, also in relation to the User's interests.

This does not mean that all Personal Data is used for this purpose. Data and conditions of use are indicated below.

Some of the services listed below may use cookies to identify the user or use the behavioral retargeting technique, ie display advertisements customized to the User's interests and behavior, also detected outside this site. For more information on this, we suggest you check the privacy policies of the respective services.

In addition to the options for the opt-out offered by the following services, the User can opt for the exclusion from the receipt of cookies related to a third party service, by visiting the [opt-out page of the Network Advertising Initiative](#) .

#### **Google AdSense (Google Inc.)**

Google AdSense is an advertising service provided by Google Inc. This service uses the "DoubleClick" Cookie, which tracks the use of this site and the User's behavior in relation to advertisements, products and services offered.

The User can decide at any time not to use the Cookie Doubleclick providing for its

deactivation: [google.com/settings/ads/onweb/optout](https://www.google.com/settings/ads/onweb/optout) .

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#) . Person adhering to the Privacy Shield.

### **Criteo (Criteo SA)**

Criteo is an advertising service provided by Criteo SA.

Personal Data collected: Cookies and Usage Data.

Place of processing: France - [Privacy Policy](#) - [Opt Out](#) .

## **Remarketing and behavioral targeting**

This type of service allows this site and its partners to communicate, optimize and serve advertisements based on the past use of this site by the User.

This activity is carried out by tracking Usage Data and the use of Cookies, information that is transferred to the partners to whom the activity of remarketing and behavioral targeting is connected.

In addition to the options for the opt-out offered by the following services, the User can opt for the exclusion from the receipt of cookies related to a third party service, by visiting the [opt-out page of the Network Advertising Initiative](#) .

### **Facebook Remarketing (Facebook, Inc.)**

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. which links the activity of this site with the Facebook advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#) . Person adhering to the Privacy Shield.

### **Facebook Custom Audience (Facebook, Inc.)**

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. which links the activity of this site with the Facebook advertising network.

Personal Data collected: Cookies and e-mails.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#) . Person adhering to the Privacy Shield.

### **Remarketing with Google Analytics for display advertising (Google Inc.)**

Google Analytics for display advertising is a remarketing and behavioral targeting service provided by Google Inc. that links the tracking activity carried out by Google Analytics and its Cookies with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#) . Person adhering to the Privacy Shield.



## **Criteo Dynamic Retargeting (Criteo SA)**

Criteo Dynamic Retargeting is a remarketing and behavioral targeting service provided by Criteo SA, which links the activity of this site with the Criteo advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: France - [Privacy Policy](#) - [Opt Out](#) .

## **AdWords Remarketing (Google Inc.)**

AdWords Remarketing is a remarketing and behavioral targeting service provided by Google Inc. that links the activity of this site with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected: Cookies and Usage Data.

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

## **Statistics**

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

### **Google Analytics (Google Inc.)**

Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google uses Personal Information collected for the purpose of evaluating the use of this site, compiling reports and sharing them with other services developed by Google.

Google may use the Personal Data to contextualise and personalize the advertisements of its advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#) . Person adhering to the Privacy Shield.

### **Google Analytics with anonymized IP (Google Inc.)**

Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google uses Personal Information collected for the purpose of evaluating the use of this site, compiling reports and sharing them with other services developed by Google.

Google may use the Personal Data to contextualise and personalize the advertisements of its advertising network.

This integration of Google Analytics makes your IP address anonymous. Anonymisation works by shortening the IP address of the Users within the borders of the member states of the European Union or in other countries participating in the agreement on the European Economic Area. Only in exceptional cases, the IP address will be sent to Google's servers and shortened within the United States.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#) . Person adhering to the Privacy Shield.

### **Tracking conversions of Facebook Ads (Facebook, Inc.)**

Tracking conversions of Facebook Ads is a statistics service provided by Facebook, Inc. which connects data from the Facebook ad network with the actions performed within this site.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) . Person adhering to the Privacy Shield.

### **Tracking conversions of Google AdWords (Google Inc.)**

Google AdWords Conversion Tracking is a statistics service provided by Google Inc. that links data from the Google AdWords ad network with actions taken on this site.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) . Person adhering to the Privacy Shield.

### **User ID extension for Google Analytics (Google Inc.)**

Google Analytics on this site uses a function called User ID. This allows a more accurate tracking of Users by assigning each one a unique ID for various sessions and devices, but in such a way as not to allow Google to personally identify an individual or permanently identify a specific device.

The User ID extension also allows you to connect data from Google Analytics with other user data collected from this site.

The Opt Out link provided below will disable the tracking for the device you are using, but does not exclude additional tracking activities made by the Owner. To deactivate the latter, contact the owner via the contact email address.

Personal Data collected: Cookie.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#) . Person adhering to the Privacy Shield.

### **Performance and content performance tests (A / B testing)**

The services contained in this section allow the Data Controller to track and analyze the response by the User, in terms of traffic or behavior, in relation to changes to the structure, text or any other component of this site.

### **Visual Website Optimizer (Wingify)**

Visual Website Optimizer is an A / B testing service provided by Wingify Inc.

Personal Data collected: Cookies and Usage Data.

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

### **Displaying content from external platforms**

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

In the event that a service of this type is installed, it is possible that, even if the Users do not use the service, the same collect traffic data relating to the pages in which it is installed.

### **Google Fonts (Google Inc.)**

Google Fonts is a service of visualization of styles of character managed by Google Inc. that allows this site to integrate such contents within its pages.

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

Place of processing: United States - [Privacy Policy](#) . Person adhering to the Privacy Shield.

### **Google Maps widget (Google Inc.)**

Google Maps is a map visualization service managed by Google Inc. that allows this site to integrate such content within its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) . Person adhering to the Privacy Shield.

## **FURTHER INFORMATION ON PERSONAL DATA**

### **Sale of goods and services online**

The Personal Data collected is used for the provision of services to the User or for the sale of products, including payment and any delivery. The Personal Data collected to complete the payment may be those relating to the credit card, the bank account used for the transfer or other payment instruments provided. Payment details collected from this site depend on the payment system used.

## **USER RIGHTS**

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

In particular, the User has the right to:

- **withdraw consent at any time.** The User can withdraw consent to the processing of their Personal Data previously expressed.
- **oppose the processing of your data.** You may object to the processing of your data when it occurs on a legal basis other than consent. Further details on the right of opposition are indicated in the section below.

- **access your data.** The User has the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the Data processed.
- **verify and request rectification.** The User can verify the correctness of his Data and request its updating or correction.
- **obtain treatment limitation.** 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 other purpose other than their conservation.
- **obtain the cancellation or removal of their Personal Data.** When certain conditions are met, the User can request the cancellation of their Data by the Owner.
- **receive your data or have it transferred to another holder.** You have the right to receive your data in a structured format, commonly used and readable by automatic device and, where technically feasible, to obtain the transfer without hindrance to another holder. This provision is applicable when the Data are processed with automated tools and the processing is based on the User's consent, on a contract of which the User is a party or on contractual measures connected to it.
- **propose a complaint.** The User can lodge a complaint with the competent personal data protection authority or act in court.

## **Details on the right of opposition**

When Personal Data is processed in the public interest, in the exercise of public authority to which the Holder is invested or to pursue a legitimate interest of the Owner, Users have the right to oppose the processing for reasons related to their particular situation.

Users are reminded that, if their data are processed for direct marketing purposes, they can oppose the processing without providing any reasons. To find out if the Owner deals with data for direct marketing purposes, Users can refer to the respective sections of this document.

## **How to exercise the rights**

To exercise the rights of the User, Users can direct a request to the contact details of the Owner indicated in this document. The requests are deposited free of charge and processed by the Owner as soon as possible, in any case within a month.

## **MORE 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 site or related Services by the User.

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

### **Specific information**

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

### **System logs and maintenance**

For needs related to operation and maintenance, this site and any third party services used by it may collect system logs, which are files that record the interactions and that may also contain personal data, such as the IP address of the user.

### **Information not contained in this policy**

Further information in relation to the processing of Personal Data may be requested at any time to the Data Controller using the contact details.

### **Response to "Do Not Track" requests**

This site does not support "Do Not Track" requests.

To find out if any third-party services used support them, the User is invited 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 informing Users on this page and, if possible, on this site as well as, if technically and legally feasible, by sending a notification to Users through one of the extremes contact information in the owner's possession. Please therefore consult this page regularly, referring to the date of the last modification indicated at the bottom.

If the modifications concern treatments whose legal basis is consent, the Controller will collect the User's consent again, if necessary.

## **DEFINITIONS AND LEGAL REFERENCES**

### **Personal Data (or Data)**

It constitutes personal data any information that, directly or indirectly, also in connection with any other information, including a personal identification number, makes a physical person identified or identifiable.

### **Usage Data**

This information is collected automatically through this site (also from third-party applications integrated into this site), including: IP addresses or domain names of the computers used by the User that connects to this site, addresses in URI notation ( Uniform Resource Identifier), 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 (good order, error, etc.) the country of origin, the characteristics of the browser and the operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details relating to the itinerary followed within the site, with particular reference to the sequence of the pages consulted, to the parameters relating to the operating system and the IT environment of the User.

### **User**

The individual who uses this site that, unless otherwise specified, coincides with the interested party.

### **Interested**

The natural person to whom the Personal Data refers.

### **Data Processor (or Manager)**

The natural person, legal person, public administration and any other entity that processes personal data on behalf of the Owner, as set out in this privacy policy.

### **Data Controller (or Holder)**

The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of the processing of personal data and the tools adopted, including the security measures related to the operation and use of this site. The Data Controller, unless otherwise specified, is the owner of this site.

### **This site**

The hardware or software tool through which the Personal Data of Users are collected and processed.

**Service**

The Service provided by this site 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 contained in this document shall be extended to all current member states of the European Union and the European Economic Area.

**Cookie**

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

**Legal references**

This privacy statement is drawn up on the basis of multiple legislative systems, including articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy statement only concerns this site.