



# WBM Studio Privacy Policy

WBM Studio's Privacy Policy describes how this website collects, uses, and shares your personal data.

Updated August 28, 2023

## Types of Data Collected

Among the Personal Data collected by this Application, independently or through third parties, there are: **Full name, Email address, Cookie, Usage data.**

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 case of Usage Data, collected automatically when using this Website.

Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to 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 Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (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 Owner at any time.

### Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- Provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- Processing is necessary for compliance with a legal obligation to which the Owner is subject;
- Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- Processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### Place

The Data are processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For more information, contact the owner.

The User's Personal Data may be transferred to a country other than the one in which the User is located. To obtain further information on the place of treatment, the User can refer to the section relating to the details on the processing of Personal Data.

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 adopted by the Data Controller to protect the Data.

The User can check whether one of the transfers described above takes place by examining the section of this document relating to the details on the processing of Personal Data or requesting information from the Data Controller by contacting him at the details indicated at the opening.

### **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 this contract is completed.
- Personal Data collected for purposes attributable to the legitimate interest of the Data Controller will be retained until this interest is satisfied. 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 Owner.

When the treatment is based on the User's consent, the Data Controller can keep Personal Data longer 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 by order of an authority.

At the end of the retention period, 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.

## **Purpose of the Processing of the Collected Data**

User data are collected to allow the owner to provide the service, fulfill legal obligations, respond to requests or executive actions, protect their rights and interests (or those of users or third parties), identify any malicious activities or fraudulent, as well as for the following purposes: Contacting the User, Managing contacts and sending messages, SPAM protection, Displaying content from external platforms, Analytics.

To obtain detailed information on the purposes of the processing and on the Personal Data processed for each purpose, the User can refer to the section "Detailed information on the processing of Personal Data".

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

Personal data are collected for the following purposes and using the following services:

## Contacting the User

- **Contact form (this Application).** By filling in the contact form with their Data, the User authorizes this Application 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 processed:** email; full name.
- **Mailing list or newsletter (this Application).** By registering with the mailing list or the newsletter, the User's email address is automatically inserted in a list of contacts to which email messages containing information, including commercial and promotional information, relating to this Application may be transmitted. The User's email address may also be added to this list as a result of registering with this Application or after making a purchase.
  - **Personal Data collected:** email; full name.

## Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

- **Mailchimp (The Rocket Science Group LLC).** Mailchimp is an email address management and message sending service provided by The Rocket Science Group LLC.
  - **Personal Data processed:** email; full name.
  - **Place of processing:** USA – [Privacy Policy](#).

## SPAM protection

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

- **Google reCAPTCHA (Google Inc.).** Google reCAPTCHA is a SPAM protection service provided by Google Inc. The use of the reCAPTCHA system is subject to [Google's privacy policy](#) and [terms of use](#).
  - **Personal data collected:** Cookie; Usage Data.
  - **Place of processing:** USA – [Privacy Policy](#); Ireland – [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 Application 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.

- **Google Fonts (Google Ireland Limited).** Google Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.
  - Personal Data processed: Tracker; Usage Data; Various types of Data as specified in the privacy policy of the service.
  - Place of processing: USA – [Privacy Policy](#); Ireland – [Privacy Policy](#).
- **Font Awesome (Fonticons, Inc.).** Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows this Website to incorporate content of this kind on its pages.
  - Personal Data processed: Usage Data.
  - Place of processing: USA – [Privacy Policy](#).
- **YouTube video widget (Google Ireland Limited).** YouTube is a video content visualization service provided by Google Ireland Limited that allows this Website to incorporate content of this kind on its pages.
  - Personal Data processed: Cookies; Usage Data.
  - Place of processing: USA – [Privacy Policy](#); Ireland – [Privacy Policy](#).
- **SoundCloud widget (SoundCloud Limited).** Soundcloud is an audio content delivery service provided by SoundCloud Limited that allows this Website to incorporate content of this kind on its pages.
  - Personal Data processed: Usage Data.
  - Place of processing: Germany – [Privacy Policy](#).

## Analytics

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

- **StatCounter (StatCounter).** StatCounter is an analytics service provided by StatCounter.
  - Personal Data processed: Cookies; Usage Data; Tracker.
  - Place of processing: Ireland – [Privacy Policy](#).
- **WP Statistics (this Website).** WP Statistics is a statistics service provided by Verona Labs.
  - Personal Data processed: Usage Data; Tracker.

## User Rights

Users can exercise certain rights with reference to the data processed by the owner.

In particular, the User has the right to:

- **Withdraw consent at any time.** The User can revoke the consent to the processing of their Personal Data previously expressed.
- **Oppose the processing of their data.** The user can object to the processing of their data when it takes place on a legal basis other than consent. Further details on the right to object are indicated in the section below.
- **Access their data.** The user has the right to obtain information on the data processed by the owner, on certain aspects of the treatment and to receive a copy of the data processed.
- **Verify and request correction.** The User can verify the correctness of his Data and request its updating or correction.

- **Obtain the limitation of the treatment.** When certain conditions are met, the User can 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.** The User has the right to receive his Data in a structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain the transfer without obstacles to another holder. This provision is applicable when the Data are processed with automated tools and the treatment 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 supervisory authority or take legal action.

### **Details on the right to object**

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

Users are reminded that, if their data were processed for direct marketing purposes, they can oppose the processing without giving any reasons. To find out if the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

### **How to exercise your rights**

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

## **Learn More About the Treatment**

### **Defense in court**

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its possible establishment 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 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 Application may provide the User with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

### **System log and maintenance**

For needs related to operation and maintenance, this Application and any third party services used by it may collect system logs, i.e. files that record the interactions and which may also contain Personal Data, such as the User IP address.

### **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.

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

This Website 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 notifying it to 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 extremes of contact he has. Please therefore consult this page frequently, referring to the date of the last modification indicated at the bottom.

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

## **Cookie Policy of this Website**

This document contains information about the technologies that enable this Website to achieve the purposes described below. These technologies allow the Owner to collect and save information (for example through the use of Cookies) or to use resources (for example by running a script) on the User's device when the latter interacts with this Website.

For simplicity, these technologies are briefly referred to as "Tracking Tools" in this document, unless there is reason to differentiate.

For example, although Cookies can be used in both web and mobile browsers, it would be out of place to speak of Cookies in the context of applications for mobile devices, since they are Tracking Tools that require the presence of a browser. For this reason, within this document the term Cookie is used only to specifically indicate that particular type of Tracking Tool.

Some of the purposes for which Tracking Tools are used may also require the User's consent. If consent is given, it can be freely revoked at any time by following the instructions contained in this document.

This Website uses Tracking Tools managed directly by the Owner (commonly called "first party" Tracking Tools) and Tracking Tools that enable services provided by third parties (commonly called "third party" Tracking Tools). Unless otherwise specified in this document, these third parties have access to the respective Tracking Tools.

Duration and expiration of Cookies and other similar Tracking Tools may vary depending on what is set by the Owner or by each third party provider. Some of them expire at the end of the User's browsing session.

In addition to what is specified in the description of each of the categories listed below, Users can obtain more detailed and updated information on the duration, as well as any other relevant information - such as the presence of other Tracking Tools - in the privacy policies of their respective third party suppliers. (through the links made available) or by contacting the Data Controller.

### **Activities strictly necessary to ensure the functioning of this Website and the provision of the Service**

This Website uses Cookies commonly called "technical" or other similar Tracking Tools to carry out activities strictly necessary to ensure the functioning or provision of the Service.

### **Other activities that involve the use of Tracking Tools**

**SPAM protection.** This type of service analyzes the traffic of this Website, potentially containing Personal Data of the Users, in order to filter it from parts of traffic, messages and content recognized as SPAM.

- **Google reCAPTCHA (Google Inc.).** Google reCAPTCHA is a SPAM protection service provided by Google Inc. The use of the reCAPTCHA system is subject to [Google's privacy policy](#) and [terms of use](#).
  - Personal data collected: Cookie; Usage Data.
  - Place of processing: USA – [Privacy Policy](#); Ireland – [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 Application 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.

- **YouTube video widget (Google Ireland Limited).** YouTube is a video content visualization service provided by Google Ireland Limited that allows this Website to incorporate content of this kind on its pages.
  - Personal Data processed: Cookies; Usage Data.
  - Place of processing: USA – [Privacy Policy](#); Ireland – [Privacy Policy](#).
- **SoundCloud widget (SoundCloud Limited).** Soundcloud is an audio content delivery service provided by SoundCloud Limited that allows this Website to incorporate content of this kind on its pages.
  - Personal Data processed: Usage Data.
  - Place of processing: Germany – [Privacy Policy](#).

**Analytics.** The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

- **StatCounter (StatCounter).** StatCounter is an analytics service provided by StatCounter.
  - Personal Data processed: Cookies; Usage Data; Tracker.

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

## How to manage preferences and provide or withdraw consent

There are various ways to manage preferences related to Tracking Tools and to give or withdraw consent, where necessary:

Users can manage preferences related to Tracking Tools directly through the settings of their devices - for example, they can prevent the use or storage of Tracking Tools.

In addition, whenever the use of Tracking Tools depends on consent, the User can give or withdraw this consent by setting their preferences in the cookie policy or by updating these preferences through the tracking settings widget, if here I'm.

Thanks to specific browser or device functions, it is also possible to remove previously saved Tracking Tools.

Other Tracking Tools present in the browser's local memory can be removed by deleting the browsing history.

With regard to third-party Tracking Tools, Users can manage preferences and withdraw consent by visiting the relevant opt out link (if available), using the tools described in the third party's privacy policy or by contacting it directly.

- **Find the settings related to the Tracking Tools.** Users can, for example, find information on how to manage Cookies in some of the most popular browsers at the following addresses:
  - [Google Chrome](#)
  - [Mozilla Firefox](#)
  - [Apple Safari](#)
  - [Microsoft Internet Explorer](#)
  - [Microsoft Edge](#)
  - [Brave](#)
  - [Opera](#)

Users can also manage some Tracking Tools for mobile applications by deactivating them through the appropriate device settings, such as the advertising settings for mobile devices or the settings related to tracking in general (Users can consult the device settings to identify the relevant one).

## Owner and Data Controller

**Data Controller:** Daniele Meo

**Owner contact email:** [info@wbmstudio.com](mailto:info@wbmstudio.com)

Since the use of third-party Tracking Tools on this Website cannot be completely controlled by the Owner, any specific reference to third-party Tracking Tools is to be considered indicative. To obtain complete information, Users are kindly invited to consult the privacy policy of the respective third party services listed in this document.

Given the objective complexity of identifying tracking technologies, Users are invited to contact the Owner should they wish to receive further information regarding the use of these technologies on this Website.

## Definitions

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

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

### **Usage data**

These are the information collected automatically through this Application (also from 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 notation (Uniform Resource Identifier), the time of the request, the method used to forward the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response from the server (successful, error, etc.). country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details of the itinerary followed within the Application, with particular reference the sequence of pages consulted, the parameters relating to the operating system and the User's IT environment.

### **User**

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

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Responsible)**

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 (or Owner)**

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 relating to the operation and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application.

### **This Website (or This Application)**

The hardware or software tool through which Users' Personal Data is collected and processed.

## **Service**

The service provided by this application as defined in the relative terms (if any) on this site/application.

## **European Union (or EU)**

Unless otherwise specified, any reference to the European Union contained in this document is intended to be extended to all current member states of the European Union and the European Economic Area.

## **Cookie**

Cookies are Tracking Tools which consist of small pieces of data stored in the User's browser.

## **Tracking Tool**

Tracking Tool means any technology – eg. Cookies, unique identifiers, web beacons, integrated scripts, e-tags and fingerprinting – which allow users to be tracked, for example by collecting or saving information on the User's device.

## **Legal References**

This privacy statement has been prepared 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 Website.