

Cookie Policy and Privacy Policy

Website: patchwords.it

This document is a working template and does not constitute legal advice. It is recommended that it be reviewed by a qualified professional (lawyer or DPO) before publication, in particular to confirm compliance with Regulation (EU) 2016/679 (the "GDPR") and any applicable local data protection guidance.

Cookie Policy

1. What cookies are

Cookies are small text files that websites send to a user's device, where they are stored and then re-transmitted to the same websites on the user's next visit. They are used for various purposes, such as authentication, session monitoring, storing preferences, and statistical analysis of how a website is used.

2. Data Controller

The Data Controller for the data collected through cookies is **Anna Beccu**, operator of the website **patchwords.it**, who can be contacted at **anna.beccu@gmail.com**.

3. Types of cookies used on this website

This website, built on WordPress, uses exclusively the following categories of cookies:

- **Necessary technical cookies:** essential for the correct functioning of the site and the WordPress platform (e.g. session management, security, storing the user's cookie-consent preference). These do not require prior consent under applicable law.
- **Third-party statistical/analytics cookies – Google Analytics:** used to collect information, in aggregated form as far as possible, on the number of users and how they browse the website.

This website does **not** use contact forms that collect personal data, and does **not** integrate Meta (Facebook/Instagram) pixels or any other advertising or third-party profiling tool other than Google Analytics.

4. Google Analytics: details of the processing

This website uses Google Analytics (the "Service"), a web analytics service provided by Google Ireland Limited ("Google"). Google uses the personal data collected to track and examine the use of the website, compile reports, and share them with other services developed by Google.

Personal data collected: IP address (set to be anonymised/truncated), device and browser identifiers, pages visited, time spent on the site, traffic source, and other browsing data collected via cookies and unique identifiers.

Purpose: aggregated statistical analysis of visits and user behaviour on the website, in order to improve its content and usability.

Legal basis: the user's consent (Art. 6(1)(a) GDPR), collected through a dedicated cookie banner before Google Analytics cookies are activated.

International data transfers: data collected through Google Analytics may be transferred to, and processed in, the United States. Google LLC is self-certified under the *EU-U.S. Data Privacy*

Framework (DPF), recognised as providing an adequate level of protection by the European Commission's adequacy decision of 10 July 2023, which allows data transfers to the United States without additional safeguards. It should be noted that some European supervisory authorities have previously raised concerns about the use of Google Analytics; it is recommended to keep data-minimisation measures active (IP anonymisation, limited retention) and to monitor future regulatory developments.

Retention period: data is retained by Google according to the settings configured in the Controller's Analytics property (typically 14 months for Google Analytics 4, unless configured otherwise).

Google's role: Google acts as a data processor on behalf of the Controller, under the applicable data processing terms made available by Google ("Data Processing Amendment").

For more information: Google's privacy policy (policies.google.com/privacy) and the Google Analytics support page (support.google.com/analytics).

5. How to manage and withdraw cookie consent

- Through the cookie banner shown on the first visit to the website, where the user can accept, reject or customise preferences relating to non-technical cookies.
- By changing preferences at any time via the "Manage cookie preferences" link/button in the website footer (if implemented).
- Directly through the browser settings, which allow the user to delete cookies already installed and to block future installation.
- By installing browser add-ons that specifically disable web-analytics cookies, such as the opt-out add-on provided by Google (tools.google.com/dlpage/gaoptout).

6. Updates to this Cookie Policy

The Controller reserves the right to make changes to this Cookie Policy at any time, by giving notice to users on this page. Users are therefore invited to consult this page regularly.

Last updated: [insert date]

Privacy Policy

Privacy notice on the processing of personal data pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR), addressed to users browsing the website patchwords.it.

1. Data Controller

The Data Controller is **Anna Beccu**, contactable at anna.beccu@gmail.com, as the operator of the website patchwords.it.

2. Types of data collected

The website does not include contact forms or registration forms: therefore, no identifying data (name, surname, personal email address) is directly collected through data actively entered by the user on the website. The Controller processes only the following categories of data:

- **Browsing data:** the computer systems and software procedures used to operate this website acquire, during normal operation, certain data whose transmission is implicit in the use of Internet

communication protocols (IP address, browser type, operating system, access times, pages requested), used solely for IT security purposes and for anonymous statistics on the use of the site.

- **Data collected through Google Analytics:** browsing data and pseudonymous identifiers collected via statistical cookies, as described in the Cookie Policy above, subject to the user's consent.
- **Data voluntarily provided by the user:** should the user contact the Controller directly via the email address published on the website, the personal data contained in that communication (e.g. email address, message content) will be processed solely to respond to the request.

3. Purposes and legal basis of the processing

Personal data is processed for the following purposes:

- to allow the website to function correctly and to ensure its security (legal basis: legitimate interest of the Controller, Art. 6(1)(f) GDPR);
- to carry out aggregated statistical analysis of traffic and use of the website through Google Analytics (legal basis: user's consent, Art. 6(1)(a) GDPR);
- to respond to any request voluntarily sent by the user via email (legal basis: performance of pre-contractual measures or legitimate interest in responding to requests received, Art. 6(1)(b)/(f) GDPR).

4. Processing methods

Processing is carried out using IT and/or telematic tools, with organisational and logical procedures strictly related to the purposes indicated, in compliance with the principles of lawfulness, fairness, transparency, data minimisation, storage limitation, and integrity and confidentiality set out in Art. 5 GDPR.

5. Data retention

- Browsing data collected by the hosting server is retained for the time strictly necessary for IT security purposes (typically no more than a few months, save for the need to establish liability in case of computer crimes).
- Data collected through Google Analytics is retained according to the settings configured in the Controller's Analytics property (typically 14 months).
- Data voluntarily provided by email is retained for the time necessary to manage the request and, thereafter, in accordance with applicable legal obligations.

6. Data disclosure and international transfers

Data collected through Google Analytics is disclosed to Google Ireland Limited, which processes it as a data processor and may transfer it to the United States within the Google corporate group, on the basis of the safeguards provided by the *EU-U.S. Data Privacy Framework* and/or the Standard Contractual Clauses approved by the European Commission. Data is not disclosed to any other third parties, nor is it used by the Controller for direct marketing or advertising profiling purposes.

7. Data subject rights

Under Articles 15-22 GDPR, users have the right to ask the Controller, at any time, for:

- access to their personal data;
- rectification or erasure of their data;

- restriction of the processing concerning them;
- objection to the processing, including where based on legitimate interest;
- data portability, where applicable;
- withdrawal of consent at any time, without affecting the lawfulness of processing based on consent given before its withdrawal.

Requests may be sent to the Controller at **anna.beccu@gmail.com**. Users also have the right to lodge a complaint with a competent data protection supervisory authority, such as the Italian Garante per la protezione dei dati personali (www.garanteprivacy.it), or their local authority.

8. Data security

The Controller adopts technical and organisational security measures appropriate to prevent loss of data, unlawful or improper use, and unauthorised access, consistent with the nature of the website and the security measures offered by the hosting provider and the WordPress platform.

9. Children

The website is not directed at children under the age of 16, and the Controller does not knowingly collect personal data relating to children.

10. Changes to this Privacy Policy

The Controller reserves the right to amend this notice at any time, by giving notice to users on this page. Users are invited to check this page periodically for updates.

Last updated: [insert date]