

PRIVACY NOTICE FOR THE WEB DOMAINS OF AVV. GIANNI DELL'AIUTO

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

1. Introduction

This notice describes how personal data of users browsing the website **www.dellaiuto.com** and the subdomains **www.homogooglis.it** and **cybermetrica.it** (together, the "Website") are processed. It is issued pursuant to Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "GDPR"), as amended and supplemented from time to time, and any regulation that may in the future replace or repeal it, in whole or in part, within the European Union legal order.

This notice also takes into account Italian Legislative Decree No. 196 of 30 June 2003 (the "Italian Privacy Code"), as amended and aligned with the GDPR by Legislative Decree No. 101 of 10 August 2018. Following that alignment, the following provisions of the Italian Privacy Code remain in force: the criminal sanctions (Articles 167-172); the powers and functions of the Italian Data Protection Authority (Garante) (Articles 141 et seq.); the provisions on processing for journalistic purposes and for the exercise of freedom of expression (Articles 136-139); processing carried out for judicial, police and defence purposes (Title III); as well as any further provisions that are not incompatible with, and have not been expressly repealed by, the GDPR.

This notice further takes into account the guidelines and general decisions issued by the Italian Data Protection Authority on this subject matter, as well as those of the competent EU authorities where applicable and to the extent they afford greater protection to data subjects.

This notice is issued solely in relation to the Website and does not extend to any other website that may be reached through links contained herein; users are invited to consult the respective privacy notices of such other websites.

The Website constitutes the informational and editorial space of the professional, editorial and research activity of Avv. Gianni Dell'Aiuto, and does not operate any contact form, newsletter subscription function, or e-commerce functionality. This notice does not apply to the processing of personal data carried out in the context of the performance of a professional engagement, for which a specific and separate notice is provided at the time the engagement is entered into.

2. Data Controller

The Data Controller is **Gianni Dell'Aiuto**, Avvocato (Attorney-at-Law), a natural person practising law on an individual basis under the trade name Studio Legale Dell'Aiuto / DA LAW.

Italian Tax Code (Codice Fiscale): DLLGNN65D26M126E

VAT Number (Partita IVA): 09816100581

Contact for the exercise of data subject rights: avvocato@dellaiuto.com

As an individual professional, the Data Controller is not required to appoint a Data Protection Officer (DPO) pursuant to Article 37 GDPR, the relevant conditions not being met. The Data Controller nonetheless remains directly and personally responsible for every processing activity and constitutes the sole point of contact for any request in this regard.

3. Place of Processing

Processing activities connected with the Website's web services take place through the infrastructure of the hosting provider, with servers located exclusively within the territory of the European Union. No data arising from browsing the Website is transferred to third countries outside the EU.

4. Categories of Data Processed

Browsing data

The computer systems and software procedures used to operate the Website acquire, in the course of their normal operation, certain data whose transmission is implicit in the use of Internet communication protocols (for example: IP addresses, the URI (Uniform Resource Identifier) addresses of the resources requested, 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 status of the server's response, and other parameters relating to the user's operating system and computing environment). This data, which is not in itself capable of directly identifying the data subject, is used solely to derive anonymous statistical information on the use of the Website, to verify its correct functioning, and to ascertain liability in the event of any computer-related offences committed against the Website.

Data voluntarily provided by the user

The Website has no contact form and no newsletter subscription function. Should a user voluntarily choose to write to the email address published on the Website, the sender's address will be acquired, as necessary to respond to the request, together with any further personal data voluntarily included in the text of the communication. Users are invited not to include, in such communications, data belonging to special categories under Article 9 GDPR (racial or ethnic origin, political opinions, religious beliefs, health data, sexual orientation, and the like), unless strictly necessary and relevant to the request itself.

Cookies

The Website uses technical cookies and, where present, third-party cookies, as described in a separate, dedicated Cookie Policy available on the Website, to which reference is made in full.

5. Purposes of Processing and Legal Basis

Purpose	Legal basis (Art. 6 GDPR)
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Technical operation of the Website, IT security, aggregated anonymous statistics	Legitimate interest of the Controller (Art. 6(1)(f))
Responding to unsolicited requests sent by email	Pre-contractual measures taken at the data subject's request / legitimate interest (Art. 6(1)(b) and (f))
Compliance with legal obligations; establishment and defence of legal claims	Legal obligation / legitimate interest (Art. 6(1)(c) and (f))

The provision of data for the purposes indicated above does not require the data subject's consent, alternative legal bases under the GDPR being applicable, with the exception of non-technical cookies, for which consent is collected in accordance with the methods set out in the Cookie Policy.

6. Processing Methods and Security Measures

Processing is carried out using IT tools and logics strictly related to the purposes indicated, adopting technical and organisational measures appropriate under Article 32 GDPR, suitable to ensure a level of security appropriate to the risk and to prevent loss, unlawful or improper use, and unauthorised access to the data.

7. Data Retention Period

Browsing data is retained for the time strictly necessary for the statistical and security purposes indicated above, and in any event not exceeding 12 months, save where a longer retention period is required for the ascertainment of computer-related offences. Data voluntarily provided by email is retained for the time necessary to respond to the request and, subsequently, for the period strictly necessary to protect any rights of the Controller in legal proceedings, within the limits permitted by law.

Any spontaneous applications or collaboration proposals, even if unanswered, will be deleted within seven days of receipt.

8. Disclosure and Transfer of Data

Data is not disseminated. It may be disclosed, to the extent strictly necessary, to parties acting as data processors under Article 28 GDPR (for example, the hosting service provider), or to third parties whose access is required by law. As indicated in Section 3, no transfers of data to countries outside the EU are envisaged.

9. Voluntary Nature of Data Provision

The provision of browsing data is technically necessary for the use of the Website. The provision of data through a voluntary email communication is entirely optional: failure to provide such data will only result in the Controller being unable to respond to the request.

10. Rights of the Data Subject

Data subjects have the right, where applicable, to obtain access to their personal data (Art. 15 GDPR), rectification (Art. 16), erasure (Art. 17), restriction of processing (Art. 18), data portability (Art. 20), and to object to processing (Art. 21), as well as to withdraw any consent given at any time, without prejudice to the lawfulness of processing carried out prior to withdrawal.

Requests may be sent to: avvocato@dellaiuto.com

Without prejudice to any other administrative or judicial remedy, a data subject who considers that the processing of their personal data has taken place in violation of applicable law has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) (www.garanteprivacy.it), as the competent supervisory authority within the Italian territory.

11. Governing Law and Jurisdiction

This notice and the processing activities it governs are subject to Italian and European law on the protection of personal data. Any dispute relating to this notice shall be subject to the exclusive jurisdiction of the Court of Rome, without prejudice to the application of mandatory consumer-protection rules; accordingly, where the user qualifies as a consumer under the Italian Consumer Code, the jurisdiction of the court of the user's place of residence or domicile shall remain applicable.

12. International Scope of Application

The Controller directs its informational and professional activity also to an international audience. For users accessing the Website from jurisdictions other than the European Union, this notice shall be deemed automatically supplemented, where applicable, by references to relevant local personal data protection laws, which will be specifically referenced in an appendix or linked documents where necessary.

13. Website Content and Liability

The content and information contained on the Website are published for informational and educational purposes only: they are not to be considered exhaustive, do not constitute legal advice or any other form of professional advice, and are not intended to establish a professional relationship with users. The Controller disclaims all liability for actions, omissions or decisions taken on the basis of the information and articles published on the Website.

All content, materials, images and documents contained on the Website are protected under copyright law, and their use without the express consent of the Controller is prohibited.

14. Updates to this Notice

Consistent with the principle of dynamic governance — rather than static, one-off compliance — that informs the Controller's professional activity, this notice is subject to periodic review in light of regulatory,

technological and organisational developments affecting the Website. Each version is identified by a progressive number and an effective date, indicated at the foot of this document.

Version 1.0 — effective as of 18 July 2026

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