

## Privacy and Cookie Policy of [www.palladiumusa.com](http://www.palladiumusa.com)

This domain name is owned by KIRON S.A.R.L. The manager is Mario Luigi MARTINO. The owner of this website, Palladium USA, Inc., is part of The Palladium Group. Kiron has licensed the use of the domain name to Palladium USA, the website owner.

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

Palladium USA, Inc. intends to ensure the privacy and security of personal data of each user/visitor, even when the Internet is accessed from abroad. This page is intended to describe the management of this site owned by Palladium USA Inc., concerning the processing of personal data of users/visitors who consult it.

This privacy policy applies exclusively to this website. It does not include websites that are linked to this website. Links to other websites are marked as such. Please note that we have no control over or responsibility for other websites; hence, this data-privacy policy does not apply to any other websites. This Website collects some Personal Data of its Users.

### California Online Privacy Protection Act

This Act (CalOPPA), like the Directives of the European Community, requires websites collecting PII to post a conspicuous privacy policy such as this one. According to CalOPPA we agree to the following:

Users can visit our site anonymously

We have a prominently displayed link to this policy on our home page, or as a minimum on the first significant page after entering our website.

Our Privacy Policy link includes the word 'Privacy', and can be easily be found on the page specified above.

Users will be notified of any privacy policy changes:

- On our Privacy Policy Page

Users are able to change their personal information:

- By emailing us

Online Tracking:

- The website does not permit a User to make a "Do Not Track" request by eliminating our Website's ability to track this User.
- We further do not block any third parties from obtaining PII from such User if they otherwise do so.

## Vermont Law

Under Vermont law, we will not share PII we collect about Vermont residents with companies outside of our corporate family, unless the law allows. For example, we may share PII with your consent, to service your requests or under joint marketing agreements with other entities with whom we have joint marketing agreements. We will not share PII about your financial status within our corporate family except with your consent, but we may share PII about your transactions with us or our experiences with you within our corporate family without your consent.

## Data Controller and Owner

Data Controller and owner is Palladium USA, Inc., 13455 Noel Road, Suite 400 Dallas, Texas 75240-6602. E-mail: [pusa@palladiumusa.com](mailto:pusa@palladiumusa.com)

This website is hosted by Boraso.com srl con socio unico, Viale Abruzzi, 79-20131 Milano, Italy

## Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Usage data and Cookie, e-mail, first name and last name, phone number.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection. The Personal Data may be freely provided by the User, or collected automatically when using this Website.

Any use of Cookies - or of other tracking tools - by this Website or by the owners of third party services used by this Website, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User. Failure to provide certain Personal Data may make it impossible for this Website to provide its services. Users are responsible for any Personal Data of third parties 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 Data Controller processes the Data of Users in a proper manner and shall take 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 Data Controller, in some cases, the Data may be accessible to certain types of persons in charge of the operation of the site (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 Data Controller at any time.

## Place

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

## Retention time

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

## The use of the collected Data

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Contact form and Analytics. The Personal Data used for each purpose is outlined in the specific sections of this document.

## Detailed information on the processing of Personal Data

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

### Contact Form (This Website)

By filling in the contact form with their Data, the User authorizes this Website 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 collected: Email address, First Name, Last Name and Phone number.

## 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.

### Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookie and Usage data.

Place of processing: USA – Privacy Policy <http://www.google.com/intl/en/policies/privacy/> The Policy set forth at this link (Google Policy) applies to the [www.palladiumusa.com](http://www.palladiumusa.com) website only to the extent it is consistent with the Owner's policies set forth in this electronic document. Users should read the Google Policy carefully to make sure they take any action allowed by Google to protect their PII this Owner's policy does not cover, including installation of the opt-out browser mentioned at the end of this section.

Type of cookies used: "\_ga", "\_gat", UA-2902106-34" and "UA-3803360-1".

To provide website visitors the ability to prevent their data from being used by Google Analytics, you can download and install the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js), available at this link: <https://tools.google.com/dlpage/gaoptout?hl=en>

## **Cookie Policy**

This Website uses Cookies. A cookie is a small text file containing a unique identification number that is transferred from the website to the hard drive of your computer through an anonymous code that can identify the computer but not the User and passively monitor your activities on the website.

Cookies are small text files that are sent to the User's terminal equipment by visited websites; they are stored in the User's terminal equipment to be then re-transmitted to the websites on the User's subsequent visits to those websites. They are used for several purposes, they have different features and may be used both by the Owner of the website you are now navigating and by other websites ("third party" cookies). As shown below you will find all the information on cookies stored by this website as well as all the information you need to manage your cookie preferences.

## **Technical Cookies and statistical aggregate**

### **Activities strictly necessary for the functioning**

This Website uses cookies to save information and location of a User's particular session on the website, and to perform other activities that are strictly necessary for the functioning of the website or session, for example in relation to the distribution of traffic on the website. The cookies used are related to a particular website session and therefore temporary.

### **Saving preferences, optimization and statistics**

This Website uses technical cookies to save your browsing preferences and optimize the browsing experience of the User. Included among these cookies, for example, are the ones to set the language for, or for the management of statistics by, the Owner of the site. All technical cookies do not require consent, therefore, are installed automatically as a result of access to the site.

### **Other types of cookies or third-party tools that might make use of cookies**

Some of the services listed below may not require your consent or may be managed directly by the Owner - depending on how described - without the help of third parties.

If among the instruments mentioned below are services operated by third parties, these may - in addition to what is specified in this policy and the site management by the Owner - track activity of the User. For detailed information, please consult the privacy policy of the services listed.

## How can I manage tracking activity and the installation of cookies?

In addition to what is specified in this document, the User can manage preferences for Cookies directly from within their own browser and prevent – for example – third parties from installing Cookies. Through the browser preferences, it is also possible to delete Cookies installed in the past, including the Cookies that might possibly have saved the consent of User for the installation of Cookies by this website. It is important to note that by disabling all Cookies, the functioning of this site may be compromised. Users can find information about how to manage Cookies in their browser at the following addresses:

- Google Chrome: [https://support.google.com/chrome/answer/95647?hl=en&p=cpn\\_cookies](https://support.google.com/chrome/answer/95647?hl=en&p=cpn_cookies),
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>,
- Apple Safari: [https://support.apple.com/kb/PH19214?viewlocale=en\\_US&locale=en\\_US](https://support.apple.com/kb/PH19214?viewlocale=en_US&locale=en_US),
- Microsoft Windows Explorer: <http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies>.

In the case of services provided by third parties, Users can exercise their right to withdraw from the tracking activity by utilizing the information provided in the third party's privacy policy, by clicking the opt-out link – if provided – or by contacting the third party.

Notwithstanding the above, the Owner advises that Users may take advantage of: Your Online Choices (<http://www.youronlinechoices.com/>). This service allows Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of this resource in addition to the information provided in this document.

## Additional information about Data collection and processing

### Legal action

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Website or related services. The User, by accessing this policy, acknowledges and understands that the Data Controller may be required to reveal personal data upon request of public authorities.

### Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request of the User.

### System Logs and Maintenance

For operation and maintenance purposes, this Website and any third party services may collect files that record interaction with this Website (System Logs) or use for this purpose other Personal Data (such as IP Addresses).

## Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

## The rights of Users

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller by using the contact information set out above.

This Website does not support “Do Not Track” requests. To determine whether any of the third party services it uses honor the “Do Not Track” requests, please read their privacy policies.

## Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Website and can request that the Data Controller remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

## Information about this privacy policy

The Data Controller is responsible for this privacy policy.

## Definitions and legal references

### Personal Data (or Data)

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

### Usage Data

Information collected automatically from this Website (or third party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Website) and the details about the path followed within the Website with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

## **User**

The individual using this Website, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refers.

## **Data Subject**

The legal or natural person to whom the Personal Data refers.

## **Data Processor (or Data Supervisor)**

The natural person, legal person, public entity, or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

## **Data Controller (or Owner)**

The natural person, legal person, public entity, or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

## **This Website**

The hardware or software tool by which the Personal Data of the User is collected.

## **Cookie**

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

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## **Legal information**

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations under Art. 10 of EC Directive n. 95/46/EC, and under the provisions of Directive 2002/58/EC, as revised by Directive 2009/136/EC, on the subject of Cookies.

Notice to California Users: this privacy statement has been prepared in fulfillment of the obligations under the provisions of the California Business and Professions Code Sections 22575-22579.

This privacy policy relates solely to this Website.

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