

Privacy Policy

Giarty ltd built the 12picks.com website. This SERVICE is provided by Giarty ltd at no cost and is intended for use as is.

This page is used to inform visitors regarding my policies with the collection, use, and disclosure of Personal Information if anyone decided to use my Service.

If you choose to use my Service, then you agree to the collection and use of information in relation to this policy. The Personal Information that I collect is used for providing and improving the Service. I will not use or share your information with anyone except as described in this Privacy Policy.

Dear Users,

In compliance with Article 13 of EU Regulation 2016/679 ("GDPR") and the principles it establishes, we invite you to carefully read this Privacy Policy before using our website (the "Website"), so you are fully aware of how your personal data (the "Data") will be processed (the "Processing") when using the Website or providing information through it.

1. Data Controller

The Data Controller is Francesco Giartosio,
Tax Code: GRTFNC59P15A122P

Address: Via Ganaceto 95, 41121 Modena, Italy

Email: giartyltd@gmail.com

Any communication regarding this Privacy Policy should be sent via email or registered mail to the above address.

2. Purpose and Legal Basis of the Processing

We may collect and use your personal data in order to:

Allow you to use the Website;

Respond to your requests (e.g., account deletion, profile management);

Fulfill pre-contractual or contractual obligations;

Comply with legal obligations.

Legal bases for processing include:

Contractual necessity or pre-contractual measures (Art. 6(1)(b) GDPR);

Legal compliance (Art.6(1)(c));

Legitimate interest of the Controller (Art. 6(1)(f));

Your explicit consent when required (Art. 7).

3. Optional or Mandatory Nature of Data Provision

Providing personal data is voluntary, but necessary for using the Website. If data is withheld or incorrect, we may be unable to provide our services. Please also inform us of any changes to your personal data.

4. Disclosure of Data

Your personal data may be disclosed to external parties performing tasks necessary to our business operations. These third parties will be appointed as Data Processors in accordance with Article 28 GDPR. Outside of these cases, your data may also be shared with additional recipients only if strictly necessary for the purposes listed above or to comply with legal obligations or authorities. Your data will never be disclosed or sold without your specific consent.

5. Sensitive and Judicial Data

If we process special categories of personal data (e.g. health, political opinions, sexual orientation) under Article 9 GDPR, this will occur only with your explicit consent or under specific legal conditions. Data regarding criminal convictions (Article 10 GDPR) will only be processed under supervision of a public authority or as allowed by law.

6. Processing Methods

Data will be processed electronically and with appropriate organizational and technical measures to ensure security, confidentiality, and relevance.

7. Territorial Scope

Your personal data will be processed within the European Union. If processing outside the EU is necessary (e.g., by third-party providers), such transfer will comply with GDPR and include appropriate safeguards (e.g., adequacy decisions, standard contractual clauses).

8. Data Retention

Data will be retained only for the time necessary to fulfill the above purposes. It may be stored longer if required by law or for legal defense purposes (e.g., until expiration of statute of limitations).

9. Changes to This Policy

This Privacy Policy applies solely to the Website and not to any third-party links or platforms. Updates will be published in the Website and become effective immediately. Users who do not agree with changes may stop using the Website.

10. Data Subject Rights (Articles 15–21 GDPR)

You may exercise the following rights at any time:

Access (Art. 15): know if and how your data is being processed.

Rectification (Art. 16): request correction of inaccurate data.

Erasure (Art. 17): request deletion of your data (“right to be forgotten”).

Restriction (Art. 18): request limited use of your data.

Portability (Art. 20): request your data in a structured, machine-readable format.

Objection (Art. 21): oppose data use, including for direct marketing.

Requests should be directed to the Data Controller at the contact information provided. You may also file a complaint with the data protection authority or pursue legal action. The Controller must respond within 1 month (extendable to 3 in complex cases).

11. Minors

The Website is intended for users over the age of 18. We do not knowingly process data of minors.

12. Withdrawal of Consent

Where processing is based on your consent, you may withdraw it at any time by writing to the Controller. Withdrawal does not affect the lawfulness of prior processing.

13. Right to Object to Marketing

You may object at any time to the use of your data for direct marketing purposes, including related profiling.

14. Information Collection and Use

For a better experience, while using our Service, I may require you to provide us with certain personally identifiable information, including but not limited to Name, Phone Number, Email, Location, Contacts. The information that I request will be retained on your device and is not collected by me in any way.

The website does not use third-party services that may collect information used to identify you.

15. Log Data

I want to inform you that whenever you use my Service, in a case of an error in the website I collect data and information (through third-party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol ("IP") address, device name, operating system version, the configuration of the website when utilizing my Service, the time and date of your use of the Service, and other statistics.

16. Cookies

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

This Service does not use these "cookies" explicitly. However, the website may use third-party code and libraries that use "cookies" to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this Service.

17. Service Providers

I may employ third-party companies and individuals due to the following reasons:

- To facilitate our Service;
- To provide the Service on our behalf;
- To perform Service-related services; or

- To assist us in analyzing how our Service is used.

I want to inform users of this Service that these third parties have access to their Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

18. Security

I value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and I cannot guarantee its absolute security.

19. Links to Other Sites

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by me. Therefore, I strongly advise you to review the Privacy Policy of these websites. I have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

20. Children's Privacy

These Services do not address anyone under the age of 13. I do not knowingly collect personally identifiable information from children under 13 years of age. In the case I discover that a child under 13 has provided me with personal information, I immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact me so that I will be able to do the necessary actions.

Changes to This Privacy Policy

I may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. I will notify you of any changes by posting the new Privacy Policy on this page.

This policy is effective as of 2025-06-28

Contact Us

If you have any questions or suggestions about my Privacy Policy, do not hesitate to contact me at giartyltd@gmail.com.