# Privacy Policy of C. Duayne Pearson

This Website collects some Personal Data from its Users.

## Owner and Data Controller

Speak The Vision, LLC dba C. Duayne Pearson
5557 Baltimore Ave.
Suite 500-1031
Hyattsville, MD 20781

**Owner contact email:** info@cduaynepearson.com

## Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: first name; last name; email address; Tracker; Usage Data; username; various types of Data; city; ZIP/Postal code; state; province; country; county; latitude (of city); longitude (of city); metro area; geography/region; IP address; device information; app information; device logs; operating systems; browser information; language; launches; number of sessions; session duration; scroll-to-page interactions; mouse movements; scroll position; keypress events; motion sensor events; touch events; video views; clicks; browsing history; search history; session statistics; page views; interaction events; page events; custom events; Application opens; phone number; shipping address; billing address; payment info; purchase history; Data communicated while using the service.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.
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.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website.

## 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.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users’ consent.

# The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, Traffic optimization and distribution, Commercial affiliation, Displaying content from external platforms, Content commenting, Handling activities related to productivity, Analytics, Managing contacts and sending messages, Backup saving and management, Data transfer outside the EU, Data transfer outside of the UK, Spam and bots protection, Collection of privacy-related preferences, Handling payments, Interaction with external social networks and platforms and Building and running this Website.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

# Detailed information on the processing of Personal Data

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

## 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.

### Fathom Analytics (Conva Ventures Inc.)

Fathom Analytics is an anonymized analytics service provided by Conva Ventures Inc. that gives the Owner insight into the use of this Website by Users without needing to identify them. Data collected is anonymized by making use of hashing techniques. Further information may be found here and within the service's privacy policy.

Personal Data processed: Usage Data.

Place of processing: Canada – Privacy Policy.

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

## Backup saving and management

This type of service allows the Owner to save and manage backups of this Website on external servers managed by the service provider itself. The backups may include the source code and content as well as the data that the User provides to this Website.

### Backup on Dropbox (Dropbox, Inc.)

Dropbox is a service to save and manage backups provided by Dropbox Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of personal information collected according to the CCPA: identifiers.

## Building and running this Website

Key components of this Website are built and run directly by the Owner by making use of the software listed below.

### WordPress (self-hosted) (this Website)

This Website is built and run by the Owner via a CMS software (Content Management System) called WordPress.

Personal Data processed: Data communicated while using the service.

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

## Collection of privacy-related preferences

This type of service allows this Website to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

### iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information, and in particular to the use of Cookies and other Trackers on this Website.

Personal Data processed: Trackers.

Place of processing: Italy – Privacy Policy.

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

## Commercial affiliation

This type of service allows this Website to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.
Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with this Website.
For details of which data are collected, please refer to the privacy policy of each service.

### Amazon Affiliation (Amazon)

Amazon Affiliation is a commercial affiliation service provided by Amazon.com Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## Contacting the User

### 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 processed: email address; first name; last name.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the VCDPA

### Mailing list or newsletter (this Website)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

Personal Data processed: email address; first name; last name.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the VCDPA, CPA, CTDPA and UCPA

**Phone contact (this Website)**

Users that provided their phone number might be contacted for commercial or promotional purposes related to this Website, as well as for fulfilling support requests.

Personal Data processed: phone number.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

## Content commenting

Content commenting services allow Users to make and publish their comments on the contents of this Website.
Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.
If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

**Comment system managed directly (this Website)**

This Website has its own internal content comment system.

Personal Data processed: first name; username.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

## Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website 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 Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

**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: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

**YouTube video widget (Google LLC)**

YouTube is a video content visualization service provided by Google LLC that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## Handling activities related to productivity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

**Google Workspace**

Google Workspace is an integrated suite of cloud-based productivity, collaboration and storage services provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. Gmail or other G Suite services are not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside these services for advertising purposes in any other way.

Personal Data processed: email address; first name; last name.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the CCPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

## Handling payments

Unless otherwise specified, this Website processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Website isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

**Android Pay**

Android Pay is a payment service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, which allows Users to make payments using their mobile phones.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; shipping address.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of personal information collected according to the CCPA: identifiers; commercial information.

**Apple Pay (Apple Inc.)**

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; shipping address.

Place of processing: United States – Privacy Policy.

Category of personal information collected according to the CCPA: identifiers; commercial information.

**Google Pay**

Google Pay is a payment service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, which allows users to make online payments using their Google credentials.

Personal Data processed: billing address; email address; first name; last name; phone number; shipping address.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of personal information collected according to the CCPA: identifiers.

**Stripe**

Stripe is a payment service provided by Stripe, Inc. or by Stripe Payments Europe, Limited, depending on how the Owner manages the Data processing.

Personal Data processed: billing address; email address; first name; last name; payment info; purchase history.

Place of processing: United States – Privacy Policy; European Union – Privacy Policy.

Category of personal information collected according to the CCPA: identifiers; commercial information.

## Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website. The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network.
This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.
It is recommended to log out from the respective services in order to make sure that the processed data on this Website isn't being connected back to the User's profile.

**Twitter Tweet button and social widgets (X Corp.)**

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by X Corp.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

## 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 (Intuit Inc.)**

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Personal Data processed: email address; first name; last name.

Place of processing: United States – Privacy Policy.

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA

**Brevo email (SendinBlue SAS)**

Brevo email is an email address management and message-sending service provided by SendinBlue SAS.

Personal Data processed: email address; Trackers; Usage Data.

Place of processing: France – Privacy Policy.

Category of personal information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## Spam and bots protection

This type of service analyzes the traffic of this Website, potentially containing Users' Personal Data, with the purpose of filtering it from unwanted parts of traffic, messages and content that are recognized as spam or protecting it from malicious bots activities.

**Cloudflare Bot Management (Cloudflare, Inc.)**

Cloudflare Bot Management is a malicious bot protection and management service provided by Cloudflare, Inc.

Personal Data processed: app information; Application opens; browser information; browsing history; city; clicks; country; county; custom events; device information; device logs; geography/region; interaction events; IP address; keypress events; language; latitude (of city); launches; longitude (of city); metro area; motion sensor events; mouse movements; number of sessions; operating systems; page events; page views; province; scroll position; scroll-to-page interactions; search history; session duration; session statistics; state; touch events; Trackers; Usage Data; video views; ZIP/Postal code.

Place of processing: United States – Privacy Policy.

Category of personal information collected according to the CCPA: identifiers; internet or other electronic network activity information; geolocation data; inferences drawn from other personal information.

This processing constitutes:

- a sale according to the VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

## Traffic optimization and distribution

This type of service allows this Website to distribute their content using servers located across different countries and to optimize their performance.
Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Website and the User's browser.
Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

**Cloudflare (Cloudflare, Inc.)**

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.
The way Cloudflare is integrated means that it filters all the traffic through this Website, i.e., communication between this Website and the User's browser, while also allowing analytical data from this Website to be collected.

Personal Data processed: Tracker; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- targeted advertising according to the CPA, CTDPA and UCPA

# Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

# Further information about the processing of Personal Data

## The Service is not directed to children under the age of 13

Users declare themselves to be adult according to their applicable legislation. Minors may use this Website only with the assistance of a parent or guardian. Under no circumstance persons under the age of 13 may use this Website.

# Cookie Policy

This Website uses Trackers. To learn more, Users may consult the Cookie Policy.

# Further Information for Users

## 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.
- 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.

## Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

**Details about the right to object to processing**

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

**How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## Transfer of Personal Data outside of the European Union

**Data transfer abroad based on consent**

If this is the legal basis, Personal Data of Users shall be transferred from the EU to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards.
In such cases, the Owner shall inform Users appropriately and collect their explicit consent via this Website.

**Data transfer abroad based on standard contractual clauses**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to "standard contractual clauses" provided by the European Commission.
This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

**Data transfer to countries that guarantee European standards**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.
The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

### Transfer of Personal Data outside of the United Kingdom

#### Data transfer abroad based on consent (UK)

If this is the legal basis, Personal Data of Users shall be transferred from the UK to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards.

In such cases, the Owner shall inform Users appropriately and collect their explicit consent via this Website.

#### Data transfer abroad based on standard contractual clauses (UK)

If this is the legal basis, the transfer of Personal Data from the UK to third countries is carried out by the Owner according to "standard contractual clauses" provided by the European Commission.

This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation, which are recognized as valid also under UK law. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

## Further information for Users in Switzerland

This section applies to Users in Switzerland, and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy.

Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the personal data, if any, the retention period and further information about Personal Data can be found in **the section titled "Detailed information on the processing of Personal Data" within this document**.

### The rights of Users according to the Swiss Federal Act on Data Protection

Users may exercise certain rights regarding their Data within the limits of law, including the following:

- right of access to Personal Data;
- right to object to the processing of their Personal Data (which also allows Users to demand that processing of Personal Data be restricted, Personal Data be deleted or destroyed, specific disclosures of Personal Data to third parties be prohibited);
- right to receive their Personal Data and have it transferred to another controller (data portability);
- right to ask for incorrect Personal Data to be corrected.

#### How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible, providing Users with the information required by law.

### Transfer of Personal Data outside of Switzerland

#### Transfer of Data outside of Switzerland based on standard data protection clauses

If this is the legal basis, Personal Data can be transferred outside of Switzerland, if such transfer is carried out according to standard data protection clauses previously approved, established or recognized by the Federal Data Protection and Information Commissioner.
This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by Swiss law. For further information, Users are requested to contact the Owner through the contact details provided in this document.

#### Transfer of Data outside of Switzerland based on the Users' consent

If this is the legal basis, Personal Data can be transferred outside of Switzerland if Users consent to such transfer.
When collecting Users' consent, the Owner makes sure to provide all the information that Users need to make an educated decision and to understand the implications and consequences of providing or denying their consent.
**Users may withdraw their consent at any time**.

**Transfer of Data outside of Switzerland to third countries that guarantee an adequate level of data protection**

If this is the legal basis, Personal Data can be transferred outside of Switzerland to a destination country, or international organization guaranteeing an adequate level of protection of the Data according to a decision of the Swiss Federal Council.

# Further information for Users in Brazil

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running this Website and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).
This section applies to all Users in Brazil (Users are referred to below, simply as “you”, “your”, “yours”), according to the "Lei Geral de Proteção de Dados" (the "LGPD"), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.
This part of the document uses the term “personal information“ as it is defined in the **LGPD**.

## The grounds on which we process your personal information

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

## Categories of personal information processed

To find out what categories of your personal information are processed, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

## Why we process your personal information

To find out why we process your personal information, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

## Your Brazilian privacy rights, how to file a request and our response to your requests

### Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and

- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

**How to file your request**

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

**How and when we will respond to your request**

We will strive to promptly respond to your requests.
In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.
You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.
In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

## Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

## Additional information for Users in Brazil

**Transfer of personal information outside of Brazil based on contracts and other legal means**

We can transfer your personal information outside of the Brazilian territory provided that we are able to ensure that any further processing of your personal information will be in compliance with the principles and the rules established by the LGPD, and your rights are safeguarded.

To do so, we may use one of the following legal means:

- specific contractual clauses for each given transfer. This means that we will enter into an agreement with the recipient of your personal information to make sure that such transfers meet the requirements explained above. Such an agreement shall be subject to the ANPD's prior verification;
- standard contractual clauses. These clauses set terms and conditions for the transfer of personal information and are adopted by the ANPD;
- global corporate clauses. These clauses set terms and conditions for the transfer of personal information within an organisation and, before they come into force, are subject to the ANPD's prior verification;
- seals of approval, certificates and codes of conduct regularly issued by the ANPD. These legal instruments allow us to transfer your personal information provided that we abide by their rules. They are subject to the previous approval of the ANPD.

#### Transfer of personal information outside of Brazil based on your consent

We can transfer your personal information outside of the Brazilian territory if you consent to such transfer.
When we ask for your consent, we'll make sure to provide all the information that you need to make an educated decision and to understand the implications and consequences of providing or denying your consent.
Such information will be given in clear and plain language and in such a way that you'll be able to clearly distinguish these requests from other consent requests that we may possibly ask.
**You may withdraw your consent at any time**.

#### Transfer of personal information outside of Brazil to countries that guarantee the same protection standards as LGPD

We can transfer your personal information outside of the Brazilian territory, if the destination country, or the international organization which receives the personal information, provides an adequate level of protection of the personal information according to the ANPD.
The ANPD authorizes such transfers whenever it considers that country to possess and provide personal information protection standards comparable to those set forth by the LGPD, having taken into account the following:

- the general and sectoral rules of the legislation in force in the country of destination or in the international organization;
- the nature of the personal information subject to the transfer;
- the compliance with the general principles on the protection of the personal information and on the rights of the individuals as set forth in the LGPD;
- the adoption of suitable security measures;
- the existence of judicial and institutional guarantees for the respect of personal information protection rights; and
- any other pertinent circumstance related to the relevant transfer.

# Further information for California consumers

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Website and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

This section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the state of California, United States of America, according to the "California Consumer Privacy Act of 2018" (the "CCPA"), as updated by the "California Privacy Rights Act" (the "CPRA") and subsequent regulations. For such consumers, this section supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the terms "personal information" (and "sensitive personal information") as defined in the California Consumer Privacy Act (CCPA).

## Notice at collection

#### Categories of personal information collected, used, sold, or shared

In this section we summarize the categories of personal information that we've collected, used, sold, or shared and the purposes thereof. **You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.**

##### Information we collect: the categories of personal information we collect

We have collected the following categories of personal information about you: identifiers, commercial information, internet or other electronic network activity information, geolocation data and inferences drawn from other personal information.

We have collected the following categories of sensitive personal information: username, payment info, payment info and payment info

We will not collect additional categories of personal information without notifying you.

##### Your right to limit the use or disclosure of your sensitive personal information and how you can exercise it

You have the right to request that we limit the use or disclosure of your sensitive personal information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer.

We can also use your sensitive personal information to perform specific purposes set forth by the law (such as, including but not limited to, helping to ensure security and integrity; undertaking activities to verify or maintain the quality or safety of our service) and as authorized by the relevant regulations.

Outside of the aforementioned specific purposes, you have the right to freely request, at any time, that we do not use or disclose your sensitive personal information. This means that whenever you ask us to stop using your sensitive personal information, we will abide by your request and we will instruct our service providers and contractors to do the same.

To fully exercise your right to limit the use or disclosure of your sensitive personal information you can contact us at any time, using the contact details provided in this document.

For a simplified method you can also use the privacy choices link provided on this Website.

We use any personal information collected from you in connection with the submission of your request solely for the purposes of complying with the request.

Once you have exercised this right, we are required to wait at least 12 months before asking whether you have changed your mind.

#### What are the purposes for which we use your personal information?

We may use your personal information to allow the operational functioning of this Website and features thereof ("business purposes"). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section "Detailed information on the processing of Personal Data" within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

#### How long do we keep your personal information?

Unless stated otherwise inside the "Detailed information on the processing of Personal Data" section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

#### How we collect information: what are the sources of the personal information we collect?

We collect the above-mentioned categories of personal information, either directly or indirectly, from you when you use this Website.

For example, you directly provide your personal information when you submit requests via any forms on this Website. You also provide personal information indirectly when you navigate this Website, as personal information about you is automatically observed and collected.

Finally, we may collect your personal information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

#### How we use the information we collect: disclosing of your personal information with third parties for a business purpose

For our purposes, the word "third party" means a person who is not any of the following: a service provider or a contractor, as defined by the CCPA.

We disclose your personal information with the third parties **listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

#### Sale or sharing of your personal information

For our purposes, the word "sale" means any "selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer's personal information by the business to **a third party, for monetary or other valuable consideration**", as defined by the CCPA.

This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

For our purposes, the word "sharing" means any "sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged", as defined by the CCPA.

Please note that the exchange of personal information with a service provider pursuant to a written contract that meets the requirements set by the CCPA, does not constitute a sale or sharing of your personal information.

#### Your right to opt out of the sale or sharing of your personal information and how you can exercise it

We sell or share your personal information with the third parties **listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

You have the right to opt out of the sale or sharing of your personal information. This means that whenever you request us to stop selling or sharing your personal information, we will abide by your request.
Such requests can be made freely, at any time, without submitting any verifiable request.
To fully exercise your right to opt out, you can contact us at any time using the contact details provided in this document.
For a simplified opt-out method you can also use the privacy choices link provided on this Website.

If you want to submit requests to opt out of the sale or sharing of personal information via a user-enabled global privacy control, like the Global Privacy Control ("GPC"), you are free to do so and we will abide by such request in a frictionless manner (as defined in the CPRA regulations). The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available here.

We use any personal information collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Once you have opted out, we are required to wait at least 12 months before asking whether you have changed your mind.

#### What are the purposes for which we use your personal information?

We may use your personal information to allow the operational functioning of this Website and features thereof ("business purposes"). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section "Detailed information on the processing of Personal Data" within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

#### How long do we keep your personal information?

Unless stated otherwise inside the "Detailed information on the processing of Personal Data" section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

## Your privacy rights under the California Consumer Privacy Act and how to exercise them

### The right to access personal information: the right to know and to portability

You have the right to request that we disclose to you:

- the categories of personal information that we collect about you;
- the sources from which the personal information is collected;
- the purposes for which we use your information;
- to whom we disclose such information;
- the specific pieces of personal information we have collected about you.

You also have **the right to know what personal information is sold or shared and to whom.** In particular, you have the right to request two separate lists from us where we disclose:

- the categories of personal information that we sold or shared about you and the categories of third parties to whom the personal information was sold or shared;
- the categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

The disclosure described above will be limited to the personal information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance — provided that this is technically feasible.

**The right to request the deletion of your personal information**

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on this Website, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and notify any of our service providers and all third parties to whom we have sold or shared the personal information to do so — provided that this is technically feasible and doesn't involve disproportionate effort.

**The right to correct inaccurate personal information**

You have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

**The right to opt out of sale or sharing of personal information and to limit the use of your sensitive personal information**

You have the right to opt out of the sale or sharing of your personal information. You also have the right to request that we limit our use or disclosure of your sensitive personal information.

**The right of no retaliation following opt-out or exercise of other rights (the right to non-discrimination)**

We will not discriminate against you for exercising your rights under the CCPA. This means that we will not discriminate against you, including, but not limited to, by denying goods or services, charging you a different price, or providing a different level or quality of goods or services just because you exercised your consumer privacy rights.

However, if you refuse to provide your personal information to us or ask us to delete or stop selling your personal information, and that personal information or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction.

To the extent permitted by the law, we may offer you promotions, discounts, and other deals in exchange for collecting, keeping, or selling your personal information, provided that the financial incentive offered is reasonably related to the value of your personal information.

**How to exercise your rights**

To exercise the rights described above, you need to submit your verifiable request to us by contacting us via the details provided in this document.

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will use any personal information collected from you in connection with the verification of your request solely for the purposes of verification and shall not further disclose the personal information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

If you are an adult, you can make a verifiable request on behalf of a child under your parental authority.

You can submit a maximum number of 2 requests over a period of 12 months.

**How and when we are expected to handle your request**

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Our disclosure(s) will cover the preceding 12-month period. Only with regard to personal information collected on or after January 1, 2022, you have the right to request that we disclose information beyond the 12-month period, and we will provide them to you unless doing so proves impossible or would involve a disproportionate effort.

Should we deny your request, we will explain you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee, or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind it.

### Additional information about California privacy

#### We do not collect personal information about California consumers below the age of 16

We do not knowingly collect personal information of consumers who are below the age of 16 nor do we sell or share it.

## Further information for Virginia consumers

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the Commonwealth of Virginia, according to the “Virginia Consumer Data Protection Act" (the "VCDPA"), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the VCDPA.

### Categories of personal data processed

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Persona Data” within this document**.

#### Categories of personal data we collect

We have collected the following categories of personal data: identifiers, commercial information, internet information, geolocation data and inferred information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

#### Why we process your personal data

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.
You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

#### How we use the data we collect: sharing of your personal data with third parties

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.
For our purposes, the word "third party" means "a natural or legal person, public authority, agency, or body other than the consumer, controller, processor, or an affiliate of the processor or the controller" as defined by the VCDPA.

#### Sale of your personal data

For our purposes, the word “sale” means any “exchange of personal data for monetary consideration by us to a third party“ as defined by the VCDPA.
Please note that according to the VCDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the VCDPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.
As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal information may be considered a sale under VCDPA.

##### Your right to opt out of the sale of your personal data and how you can exercise it

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

#### Processing of your personal data for targeted advertising

For our purposes, the word "targeted advertising" means "displaying advertisements to you where the advertisement is selected based on personal data obtained from your activities over time and across nonaffiliated websites or online applications to predict your preferences or interests" as defined by the VCDPA.

Please note that according to the VCDPA, targeted advertising does not include: “advertisements based on activities within a controller's own websites or online applications; advertisements based on the context of a consumer's current search query, visit to a website or online application; advertisements directed to a consumer in response to the consumer's request for information or feedback; or processing personal data solely for measuring or reporting advertising performance, reach, or frequency”.

To find out more details on the processing of your personal data for targeted advertising purposes, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

##### Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

## Your privacy rights under the Virginia Consumer Data Protection Act and how to exercise them

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- **access personal data: the right to know.** You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- **correct inaccurate personal data.** You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- **request the deletion of your personal data.** You have the right to request that we delete any of your personal data.
- **obtain a copy of your personal data.** We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity — provided that this is technically feasible.
- **opt out of the processing of your personal data for the purposes of targeted advertising**, the **sale of personal data**, or **profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **non-discrimination.** We will not discriminate against you for exercising your rights under the VCDPA. This means that we will not, among other things, deny goods or services, charge you a different price, or provide a different level or quality of goods or services just because you exercised your consumer privacy rights. However, if you refuse to provide your personal data to us or ask us to delete or stop selling your personal data, and that personal data or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction. To the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if you have exercised your right to opt out, or our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

#### How to exercise your rights

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

**How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 60 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may contact the Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to two requests per year. If your request is manifestly unfounded, excessive or repetitive, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

### Additional information about Virginia privacy

**We do not collect personal data about Virginia consumers below the age of 13**

We do not knowingly collect personal data of Virginia consumers who are below the age of 13 nor do we sell their data or process them for targeted advertising purposes.

## Further information for Colorado consumers

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Website and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Colorado, according to the “Colorado Privacy Act" (the "CPA"), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the CPA.

### Categories of personal data processed

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Persona Data” within this document**.

**Categories of personal data we collect**

We have collected the following categories of personal data: identifiers, commercial information, internet information, geolocation data and inferred information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

**Why we process your personal data**

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.
You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

**How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CPA.

**Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the CPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CPA.

Please note that according to the CPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

**Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

**Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CPA.

Please note that according to the CPA, targeted advertising does not include: “advertisements directed to a consumer in response to the consumer's request for information or feedback; advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; or processing personal data solely to measure or report advertising frequency, performance or reach”.

**Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

#### Universal opt-out mechanism: Global privacy control

If you want to submit requests to opt-out of the sale of personal data or the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control ("GPC"), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available here.

## Your privacy rights under the Colorado Privacy Act and how to exercise them

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

#### How to exercise your rights

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

#### How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may contact the Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to two requests per year.

## Additional information about Colorado privacy

#### We do not collect personal data about Colorado consumers below the age of 13

We do not knowingly collect personal data of Colorado consumers who are below the age of 13 nor do we sell or process their data for targeted advertising purposes.

# Further information for Connecticut consumers

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Website and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies o all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Connecticut, according to “An Act Concerning Personal Data Privacy and Online Monitoring " (also known as "The Connecticut Data Privacy Act" or the “CTDPA"), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the CTDPA.

## Categories of personal data processed

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Persona Data” within this document**.

**Categories of personal data we collect**

We have collected the following categories of personal data: identifiers, commercial information, internet information, geolocation data and inferred information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

**Why we process your personal data**

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.
You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

**How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CTDPA.

**Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the CTDPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CTDPA.

Please note that according to the CTDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CTDPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

**Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

**Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across non affiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CTDPA.

Please note that according to the CTDPA, targeted advertising does not include: “advertisements based on activities within a controller's own web sites or online applications; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; advertisements directed to a consumer in response to the consumer's request for information or feedback; or processing personal data solely to measure or report advertising frequency, performance or reach”.

##### Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

##### Universal opt-out mechanism: Global privacy control

If you want to submit requests to opt-out of the sale of personal data or the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control (“GPC”), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available here.

## Your privacy rights under the Connecticut Data Privacy Act and how to exercise them

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

**How to exercise your rights**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

**How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may contact the Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to one request per year.

### Additional information about Connecticut privacy

**We do not collect personal data about Connecticut consumers below the age of 13**

We do not knowingly collect personal data of Connecticut consumers who are below the age of 13 nor do we sell or process their data for targeted advertising purposes.

## Further information for Utah consumers

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Website and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Utah, according to the “Consumer Privacy Act" (the “UCPA"), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the UCPA.

### Categories of personal data processed

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Persona Data” within this document**.

**Categories of personal data we collect**

We have collected the following categories of personal data: identifiers, commercial information, internet information, geolocation data and inferred information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

**Why we process your personal data**

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

**How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person other than: the consumer, controller, or processor; or an affiliate or contractor of the controller or the processor" as defined by the UCPA.

**Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the UCPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the UCPA.

Please note that according to the UCPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the UCPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

##### Your right to opt out of the sale of your personal data and how you can exercise it

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

**Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by UCPA.

Please note that according to the UCPA, targeted advertising does not include: “advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to an web site or online application; advertisements directed to a consumer in response to the consumer's request for information, product, a service or feedback; or processing personal data solely to measure or report advertising performance, reach or frequency.”

##### Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on this Website.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

## Your privacy rights under the Utah Consumer Privacy Act and how to exercise them

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising or the sale of personal data.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee,

if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

**How to exercise your rights**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request. We may retain your email address to respond to your request.

If you are an adult, you can make a request on behalf of a child under your parental authority.

**How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request.

We do not charge a fee to respond to your request, for up to one request per year.

### Additional information about Utah privacy

**We do not collect personal data about Utah consumers below the age of 13**

We do not knowingly collect personal data of Utah consumers who are below the age of 13 nor do we sell or process their data for targeted advertising purposes.

## Additional information about Data collection and processing

### Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services.
The User declares to be aware that the Owner 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.

### 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 other Personal Data (such as the IP Address) for this purpose.

### Information not contained in this policy

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

### Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

# Further information for Users in Brazil

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running this Website and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").
This section applies to all Users in Brazil (Users are referred to below, simply as "you", "your", "yours"), according to the "Lei Geral de Proteção de Dados" (the "LGPD"), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.
This part of the document uses the term "personal information" as it is defined in the **LGPD**.

## The grounds on which we process your personal information

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

## Categories of personal information processed

To find out what categories of your personal information are processed, you can read the section titled "Detailed information on the processing of Personal Data" within this document.

## Why we process your personal information

To find out why we process your personal information, you can read the sections titled "Detailed information on the processing of Personal Data" and "The purposes of processing" within this document.

## Your Brazilian privacy rights, how to file a request and our response to your requests

### Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

**How to file your request**

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

**How and when we will respond to your request**

We will strive to promptly respond to your requests.
In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.
You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.
In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

## Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

## Additional information for Users in Brazil

**Transfer of personal information outside of Brazil based on contracts and other legal means**

We can transfer your personal information outside of the Brazilian territory provided that we are able to ensure that any further processing of your personal information will be in compliance with the principles and the rules established by the LGPD, and your rights are safeguarded.

To do so, we may use one of the following legal means:

- specific contractual clauses for each given transfer. This means that we will enter into an agreement with the recipient of your personal information to make sure that such transfers meet the requirements explained above. Such an agreement shall be subject to the ANPD's prior verification;
- standard contractual clauses. These clauses set terms and conditions for the transfer of personal information and are adopted by the ANPD;
- global corporate clauses. These clauses set terms and conditions for the transfer of personal information within an organisation and, before they come into force, are subject to the ANPD's prior verification;
- seals of approval, certificates and codes of conduct regularly issued by the ANPD. These legal instruments allow us to transfer your personal information provided that we abide by their rules. They are subject to the previous approval of the ANPD.

**Transfer of personal information outside of Brazil based on your consent**

We can transfer your personal information outside of the Brazilian territory if you consent to such transfer.
When we ask for your consent, we'll make sure to provide all the information that you need to make an educated decision and to

understand the implications and consequences of providing or denying your consent.
Such information will be given in clear and plain language and in such a way that you'll be able to clearly distinguish these requests from other consent requests that we may possibly ask.
**You may withdraw your consent at any time**.

**Transfer of personal information outside of Brazil to countries that guarantee the same protection standards as LGPD**

We can transfer your personal information outside of the Brazilian territory, if the destination country, or the international organization which receives the personal information, provides an adequate level of protection of the personal information according to the ANPD.
The ANPD authorizes such transfers whenever it considers that country to possess and provide personal information protection standards comparable to those set forth by the LGPD, having taken into account the following:

- the general and sectoral rules of the legislation in force in the country of destination or in the international organization;
- the nature of the personal information subject to the transfer;
- the compliance with the general principles on the protection of the personal information and on the rights of the individuals as set forth in the LGPD;
- the adoption of suitable security measures;
- the existence of judicial and institutional guarantees for the respect of personal information protection rights; and
- any other pertinent circumstance related to the relevant transfer.

## Definitions and legal references

**Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

**Usage Data**

Information collected automatically through 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 Application) and the details about the path followed within the Application 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 who, unless otherwise specified, coincides with the Data Subject.

**Data Subject**

The natural person to whom the Personal Data refers.

**Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

**Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, 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 (or this Application)**

The means by which the Personal Data of the User is collected and processed.

**Service**

The service provided by this Website as described in the relative terms (if available) and on this site/application.

**European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

**Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

**Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User’s device.

**Legal information**

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to this Website, if not stated otherwise within this document.

Latest update: January 28, 2024