

# Privacy Policy of Casavo

Casavo collects some Personal Data from its Users.

## Owner and Data Controller

Casavo Management S.p.A. with registered office in Milan (MI), Via Luigi Porro Lambertenghi, 7, registered in the Register of Companies of the Metropolitan Chamber of Commerce of Milan, Monza and Brianza, Lodi under no. REA 2501133, VAT no. 10071150964

**Owner contact email:** [gdpr@casavo.com](mailto:gdpr@casavo.com)

## Types of Data collected

Among the types of Personal Data that Casavo collects, by itself or through third parties, there are: Usage Data; Cookies; email address; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); first name; last name; phone number; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; number of Users; session statistics; IP address; device information; browser information; operating systems; city; ZIP/Postal code; state; county; country; latitude (of city); longitude (of city); metro area; geography/region.

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 Casavo.

Unless specified otherwise, all Data requested by Casavo is mandatory and failure to provide this Data may make it impossible for Casavo to provide its services. In cases where Casavo 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 Casavo or by the owners of third-party services used by Casavo 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 Casavo.

## 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 Casavo (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: Displaying content from external platforms, Tag Management, Remarketing and behavioral targeting, Advertising, Hosting and backend infrastructure, Analytics, Contacting the User, Managing contacts and sending messages, Traffic optimization and distribution, SPAM protection, Heat mapping and session recording, Infrastructure monitoring, User database management and Managing support and contact requests.

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:

### **Advertising**

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Casavo, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User’s interests and behavior, including those detected outside Casavo. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### **Facebook Lookalike Audience (Facebook, Inc.)**

Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Facebook, Inc. that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of Casavo or engagement with relevant content across the Facebook apps and services.

On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this [opt-out page](#).

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

#### **Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)**

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on Casavo. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

#### **Google Ads conversion tracking (Google Ireland Limited)**

Google Ads conversion tracking is an analytics service provided by Google Ireland Limited that connects data from the Google Ads advertising network with actions performed on Casavo.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

#### **Google Ads Similar audiences (Google Ireland Limited)**

Similar audiences is an advertising and behavioral targeting service provided by Google Ireland Limited that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of Casavo.

On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising Trackers by going to: Google [Ad Settings](#).

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: Cookies; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

### **Google AdSense (Google Ireland Limited)**

Google AdSense is an advertising service provided by Google Ireland Limited. This service uses the “DoubleClick” Cookie, which tracks use of Casavo and User behavior concerning ads, products and services offered. Users may decide to disable all the DoubleClick Cookies by going to: [Google Ad Settings](#).

In order to understand Google's use of data, consult [Google's partner policy](#).

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

### **TikTok conversion tracking (TikTok Technology Limited)**

TikTok conversion tracking is an analytics and behavioral targeting service provided by TikTok Technology Limited that connects data from the TikTok advertising network with actions performed on Casavo. The TikTok pixel tracks conversions that can be attributed to TikTok ads and enables to target groups of Users on the base of their past use of Casavo.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

## **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.

### **Analytics collected directly (Casavo)**

Casavo uses an internal analytics system that does not involve third parties.

Personal Data processed: Cookies; Usage Data.

### **Google Analytics Demographics and Interests reports (Google Ireland Limited)**

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for Casavo (demographics means age and gender Data).

Users can opt out of Google's use of cookies by visiting Google's [Ads Settings](#).

Personal Data processed: Cookies; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

### **Google Analytics Advertising Reporting Features (Google Ireland Limited)**

Google Analytics on Casavo has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's [Ads Settings](#).

Personal Data processed: Cookies; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

## **Meta Events Manager (Meta Platforms Ireland Limited)**

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on Casavo.

Personal Data processed: Trackers.

Place of processing: Ireland – [Privacy Policy](#) – [Opt out](#).

## **Google Analytics 4 (Google Ireland Limited)**

Google Analytics 4 is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of Casavo, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google’s official documentation](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

Personal Data processed: number of Users; session statistics; Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

## **Contacting the User**

### **Contact form (Casavo)**

By filling in the contact form with their Data, the User authorizes Casavo 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; phone number.

### **Phone contact (Casavo)**

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

Personal Data processed: phone number.

### **Mailing list or newsletter (Casavo)**

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 Casavo. Your email address might also be added to this list as a result of signing up to Casavo or after making a purchase.

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

## **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of Casavo 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 Ireland Limited)**

Google Fonts is a typeface visualization service provided by Google Ireland Limited that allows Casavo to incorporate content of this kind on its pages.

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

Place of processing: Ireland – [Privacy Policy](#).

### **Video Vimeo (Vimeo, LLC)**

Vimeo is a video content visualization service provided by Vimeo, LLC that allows Casavo to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Google Maps widget (Google Ireland Limited)**

Google Maps is a maps visualization service provided by Google Ireland Limited that allows Casavo to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

### **Heat mapping and session recording**

Heat mapping services are used to display the areas of Casavo that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior. Some of these services may record sessions and make them available for later visual playback.

### **Microsoft Clarity (Microsoft Corporation)**

Microsoft Clarity is a session recording and heat mapping service provided by Microsoft Corporation. Microsoft processes or receives Personal Data via Microsoft Clarity, which in turn may be used for any purpose in accordance with the Microsoft Privacy Statement, including improving and providing Microsoft Advertising.

Personal Data processed: Trackers.

Place of processing: Ireland – [Privacy Policy](#).

### **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable Casavo to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of Casavo.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### **Amazon Web Services (AWS) (Amazon Web Services, Inc.)**

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

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

Place of processing: Ireland – [Privacy Policy](#).

### **Amazon S3 (Amazon Web Services, Inc.)**

Amazon S3 is a cloud storage service provided by Amazon Web Services, Inc.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Infrastructure monitoring**

This type of service allows Casavo to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved. Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of Casavo.

### **Sentry (Functional Software, Inc. )**

Sentry is a monitoring service provided by Functional Software, Inc. .

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

Place of processing: United States – [Privacy Policy](#).

## **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.

### **Twilio (Twilio, Inc.)**

Twilio is a phone numbers management and communication service provided by Twilio, Inc.

Personal Data processed: phone number.

Place of processing: United States – [Privacy Policy](#).

### **Sendgrid (Sendgrid)**

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

Personal Data processed: email address.

Place of processing: United States – [Privacy Policy](#).

### **ZOHO Campaigns (Zoho Corporation Pvt. Ltd.)**

ZOHO Campaigns is an email address management and message sending service provided by Zoho Corporation Pvt. Ltd.

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

Place of processing: United States – [Privacy Policy](#).

### **Amazon Simple Email Service (SES) (Amazon)**

Amazon Simple Email Service is an email address management and message sending service provided by Amazon.com Inc.

Personal Data processed: email address.

Place of processing: United States – [Privacy Policy](#).

## **Managing support and contact requests**

This type of service allows Casavo to manage support and contact requests received via email or by other means, such as the contact form. The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

### **ZOHO CRM Email (Zoho Corporation Pvt. Ltd.)**

ZOHO CRM Email is a support and contact request management service provided by Zoho Corporation Pvt. Ltd.

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

Place of processing: United States – [Privacy Policy](#).

## **Remarketing and behavioral targeting**

This type of service allows Casavo and its partners to inform, optimize and serve advertising based on past use of Casavo by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the [Network Advertising Initiative opt-out page](#).

**Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.**

### **Google Ads Remarketing (Google Ireland Limited)**

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google Ireland Limited that connects the activity of Casavo with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Cookies; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

### **Facebook Custom Audience (Facebook, Inc.)**

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of Casavo with the Facebook advertising network.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this [opt-out page](#).

Personal Data processed: Cookies; email address.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

### **Facebook Remarketing (Facebook, Inc.)**

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of Casavo with the Facebook advertising network.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

### **Google Signals (Google Ireland Limited)**

Casavo uses Google Signals, a feature of Google Analytics, which will associate the visitation information that it collects from Casavo with Google information from accounts of signed-in Google-account users who have consented to this association for the purpose of ads personalization. This Google information may include User location, search history, YouTube history and Data from sites that partner with Google – and is used to provide aggregated and anonymized insights into Users' cross device behaviors.

If a User falls under the described association, they [may access and/or delete such Data via My Activity](#) provided by Google.

Personal Data processed: Cookies; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

### **Remarketing with Google Analytics (Google Ireland Limited)**

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google Ireland Limited that connects the tracking activity performed by Google Analytics and its Cookies with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Cookies; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

### **TikTok Remarketing (TikTok Technology Limited)**

TikTok Remarketing is a remarketing and behavioral targeting service provided by TikTok Technology Limited that connects the activity of Casavo with the TikTok advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

### **LinkedIn Website Retargeting (LinkedIn Corporation)**

LinkedIn Website Retargeting is a remarketing and behavioral targeting service provided by LinkedIn Corporation that connects the activity of Casavo with the LinkedIn advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

## **SPAM protection**

This type of service analyzes the traffic of Casavo, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

### **Google reCAPTCHA (Google Ireland Limited)**

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited. The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on Casavo in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### **Google Tag Manager (Google Ireland Limited)**

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

## **Traffic optimization and distribution**

This type of service allows Casavo 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 Casavo 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 Casavo, i.e., communication between Casavo and the User's browser, while also allowing analytical data from Casavo to be collected.

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

Place of processing: United States – [Privacy Policy](#).

### **Amazon CloudFront (Amazon Web Services, Inc.)**

Amazon CloudFront is a traffic optimization and distribution service provided by Amazon Web Services, Inc.

Personal Data processed: browser information; city; country; county; device information; geography/region; IP address; latitude (of city); longitude (of city); metro area; operating systems; state; Usage Data; ZIP/Postal code.

Place of processing: Ireland – [Privacy Policy](#).

### **Amazon Route 53 (Amazon Web Services, Inc.)**

Amazon Route 53 is a managed domain name system (DNS) service provided by Amazon Web Services, Inc. Amazon Route 53 manages DNS infrastructure to deliver traffic quickly and securely.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

## **User database management**

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Casavo, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving Casavo. Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Casavo.

### **ZOHO CRM (Zoho Corporation Pvt. Ltd.)**

ZOHO CRM is a User database management service provided by Zoho Corporation Pvt. Ltd.

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

Place of processing: United States – [Privacy Policy](#).

## **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**

### **iubenda Cookie Solution (consent Cookie)**

iubenda consent Cookie (\_iub\_cs-X) is set by the iubenda Cookie Solution and stores User preferences related to Trackers in the local domain.

## **Cookie Policy**

Casavo 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.

## **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 Casavo 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, Casavo 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, Casavo and any third-party services may collect files that record interaction with Casavo (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 Casavo 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.

## **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 Casavo (or third-party services employed in Casavo), which can include: the IP addresses or domain names of the computers utilized by the Users who use Casavo, 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 Casavo 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 Casavo. The Data Controller, unless otherwise specified, is the Owner of Casavo.

### **Casavo (or this Application)**

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

**Service**

The service provided by Casavo 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 policy relates solely to Casavo, if not stated otherwise within this document.

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