

# Privacy Policy of ingo.it/

This Application collects some Personal Data from its Users.

## Owner and Data Controller

INGO S.r.l. Società Benefit, con sede in Via I Maggio 13 - 20037 Paderno Dugnano (MI), Italy; VAT number IT10016130964  
Dati (DPO): è la figura incaricata di sorvegliare che sia osservata la normativa in materia di trattamento dei dati personali e di rispondere alle tue richieste di chiarimento su come trattiamo i tuoi dati. Puoi contattarci per ottenere informazioni e/o per l'esercizio dei tuoi diritti all'indirizzo e-mail: [ufficio.privacy@technesy.it](mailto:ufficio.privacy@technesy.it)  
Il DPO è anche la figura incaricata dalla società di rispondere alle tue richieste per l'esercizio del diritto di accesso e degli altri diritti previsti dal GDPR. Puoi contattarlo all'indirizzo e-mail indicato: [alessandro@mcq.it](mailto:alessandro@mcq.it)

**Owner contact email:** [ufficio.privacy@technesy.it](mailto:ufficio.privacy@technesy.it)

## Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Trackers; city; ZIP/Postal code; state; province; country; county; latitude (of city); longitude (of city); metro area; geography/region; Usage Data; 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; first name; last name; phone number; VAT Number; company name; profession; physical address; email address; field of activity; profile picture; workplace; number of Users; answers to questions; Current City; username; purchase history; Tax ID; website; education history; job position; social media accounts; work history; time zone; payment info; Data communicated while using the service; user subscriptions; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); diagnostic events; positional information; User ID; Data communicated in order to use the Service; picture; date of birth; contact info.

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 Application.

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

## 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 Application (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: Traffic optimization and distribution, Spam and bots protection, Contacting the User, Advertising, Registration and authentication provided directly by this Application, Remarketing and behavioral targeting, Analytics, Tag Management, User database management, Managing data collection and online surveys, Handling activities related to productivity, Managing contacts and sending messages, Heat mapping and session recording, Managing landing and invitation pages, Displaying content from external platforms, Connecting Data, Managing support and contact requests, Commercial affiliation and Marketing.

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 this Application, 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 this Application. 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.

### **Direct Email Marketing (DEM) (this Application)**

This Application uses the User Data to propose services and products provided by third parties or unrelated to the product or service provided by this Application.

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

### **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 this Application.

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 this Application.

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: Trackers; Usage Data.

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

### **Meta ads conversion tracking (Meta pixel) (Meta Platforms Ireland Limited)**

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms Ireland Limited that connects data from the Meta Audience Network with actions performed on this Application. 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: Ireland – [Privacy Policy](#) – [Opt out](#).

## **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

### **Google Analytics 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 this Application, 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](#).

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

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

### **Matomo Cloud (InnoCraft)**

Matomo Cloud is an analytics service provided by InnoCraft.

Personal Data processed: browsing history; city; geography/region; IP address; number of sessions; page views; scroll position; search history; session duration; session statistics; time zone; Usage Data.

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

### **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 this Application.

Personal Data processed: browser information; browsing history; city; clicks; country; Data communicated while using the service; email address; first name; IP address; last name; page views; payment info; phone number; search history; state; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data; user subscriptions.

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

## **Commercial affiliation**

This type of service allows this Application 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 Application.

For details of which data are collected, please refer to the privacy policy of each service.

### **Erogazione servizi e gestione eventi (webinar, convegni, corsi)**

Consente di usufruire del servizio richiesto a seguito della compilazione del form on-line, ossia, a titolo esemplificativo e non esaustivo, di iscriversi e di partecipare all’evento/al webinar o di effettuare il download di documenti, di partecipazione a corsi organizzati dal Titolare e ogni altra attività/evento assimilabile

## **Connecting Data**

This type of service allows the Owner to connect Data with third-party services disclosed within this privacy policy. This results in Data flowing through these services, potentially causing the retention of this Data.

### **Zapier (Zapier, Inc.)**

Zapier is a workflow automation service provided by Zapier, Inc. that automates the movement of Data between (third-party) services.

Personal Data processed: city; company name; Data communicated while using the service; device information; email address; first name; last name; phone number; picture; profession; Usage Data; username; VAT Number; workplace.

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

## **Contacting the User**

### **Contact form (this Application)**

By filling in the contact form with their Data, the User authorizes this Application 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: city; company name; country; email address; field of activity; first name; last name; phone number; physical address; profession; state; VAT Number; ZIP/Postal code.

### **Mailing list or newsletter (this Application)**

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

Personal Data processed: city; company name; email address; first name; last name; phone number; physical address; profession; Trackers.

## **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction. 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.

### **YouTube IFrame Player (Google Ireland Limited)**

YouTube IFrame Player is a video content visualization service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Through this Service, this Application may collect Data directly or indirectly on or from Users' devices, including by making use of trackers. Users may restrict such access to their Data via the [security settings page](#) provided by Google. Users may ask the Owner for further information about these privacy settings at any time through the contact details provided in this document.

Data collected through the Service may also be used to help third parties deliver interest-based advertising. Users can opt out of third-party interest-based advertising through their device settings or by visiting the [Network Advertising Initiative opt-out page](#).

Personal Data processed: Data communicated in order to use the Service; Data communicated while using the service; Usage Data; User ID.

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

### **YouTube video widget (Google Ireland Limited)**

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

Personal Data processed: Trackers; Usage Data.

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

## **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.

### **Human resources managed internally (this Application)**

This Application uses an internal human resources system that does not involve third parties.

Personal Data processed: city; education history; email address; first name; job position; last name; phone number; profile picture; social media accounts; work history.

### **Gestione della produttività, sviluppo prodotto, monitoraggio sistemi**

Trattamento e gestione delle informazioni generate nel contesto dell'uso dei prodotti o dei servizi da te acquistati, sia in modalità "on premises" (cioè nel caso di prodotto installato su tuoi sistemi o macchine) sia in modalità "in cloud" (cioè mentre usi online i servizi di INGO), quali dati di log, dati relativi a licenze, installazioni e configurazioni, dati relativi a registrazioni effettuate, processi di interazione e di transazione, indicatori di prestazione, dati relativi a flussi di navigazione e visualizzazioni di pagine, utilizzo e conteggi di funzionalità.

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

Heat mapping services are used to display the areas of this Application 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: clicks; country; device information; diagnostic events; interaction events; page events; positional information; scroll-to-page interactions; session duration; time zone; Trackers; Usage Data.

Place of processing: Germany – [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.

### **MailUp (Growens S.p.A.)**

MailUp is an email address management and message sending service provided by Growens S.p.A.

Personal Data processed: company name; country; email address; first name; last name; phone number; physical address; profession; Usage Data.

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

### **Managing data collection and online surveys**

This type of service allows this Application to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

### **JotForm (JotForm Inc.)**

JotForm is a form builder and data collection platform provided by JotForm Inc.

Personal Data processed: company name; country; email address; first name; last name; phone number; physical address; profession; Tax ID; Usage Data; username; VAT Number; website.

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

### **Google Forms (Google Ireland Limited)**

Google Forms is a form builder and data collection platform provided by Google Ireland Limited.

Personal Data processed: answers to questions; city; contact info; date of birth; email address; first name; last name; physical address; profession; username; workplace.

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

### **Managing landing and invitation pages**

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

### **Unbounce (Unbounce Marketing Solutions Inc.)**

Unbounce is a landing page management service provided by Unbounce Marketing Solutions Inc., that allows this Application to collect the email addresses of Users interested in its service.

Unbounce allows the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of the created landing pages.

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

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

### **Managing support and contact requests**

This type of service allows this Application 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).

### **Assistenza, supporto e manutenzione**

Gestiamo e trattiamo i tuoi dati per rispondere alle tue richieste di registrazione e gestione dell'account; nonché, per eseguire le attività necessarie alla conclusione ed esecuzione del contratto per fornire il servizio/prodotto da te richiesto o acquistato; per gestire gli eventuali reclami e le richieste di invio delle comunicazioni di servizio e aggiornamenti di prodotto; assistere, supportare e formare chi usa i nostri servizi e prodotti; per le attività di migrazione a nuovi sistemi/versioni, per la manutenzione dei prodotti e delle licenze e per erogare tutta l'attività di supporto nell'utilizzo dei prodotti acquistati.

### **Marketing**

#### **Marketing generico e marketing per conto di società del Gruppo Technesy**

Svolgimento di attività di marketing attraverso l'invio di comunicazioni commerciali relative a servizi e/o prodotti erogati dal Gruppo Technesy

Marketing generico ad opera del Titolare e/o delle Aziende del Gruppo Technesy: a titolo esemplificativo, invio di materiale pubblicitario; per iscrizione a webinar, eventi e per ricevere aggiornamenti sulle nostre attività e pubblicazioni sul nostro sito internet o blog; nonché realizzazione di studi di mercato e analisi statistiche.

Nel dettaglio, si tratta di attività che può consistere nell'invio di aggiornamenti su novità e offerte commerciali di prodotti e servizi INGO e/o quelli erogati dal Gruppo Technesy; per invitarti a partecipare a eventi o altre iniziative commerciali; nonché per lo svolgimento di ricerche statistiche, sondaggi d'opinione e ricerche di mercato allo scopo di migliorare i nostri servizi, i nostri prodotti, le nostre attività e il rapporto con i nostri utenti. Tutto ciò potrà avvenire sia tramite canali di comunicazione tradizionali quali la posta cartacea o la telefonata da parte di un operatore che tramite strumenti di comunicazione automatizzati quali email, chat, messaggi (sms e altri messaggi istantanei), chatbot e altri strumenti di comunicazione a distanza.

Svolgimento di attività di marketing attraverso l'invio di comunicazioni commerciali relative a servizi e/o prodotti analoghi a quelli oggetto del tuo contratto.

Finalità di marketing terze parti: trattiamo i tuoi Dati per inviarti aggiornamenti su novità e offerte commerciali di prodotti e servizi erogati dai nostri Partner Commerciali; oppure per invitarti a partecipare a eventi, condurre ricerche di mercato o altre

iniziative commerciali organizzati e/o promosse dai nostri Partner Commerciali. Potremo anche comunicare i tuoi dati personali ai nostri Partner Commerciali, per l'invio di comunicazioni di marketing e per altre iniziative promozionali, sia tramite canali di comunicazione tradizionali quali la posta cartacea o la telefonata da parte di un operatore che tramite strumenti di comunicazione automatizzati quali email, chat, messaggi (sms e altri messaggi istantanei), chatbot e altri strumenti di comunicazione a distanza.

## **Registration and authentication provided directly by this Application**

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

### **Direct registration (this Application)**

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data processed: city; company name; country; email address; field of activity; first name; last name; phone number; physical address; profession; profile picture; state; workplace; ZIP/Postal code.

## **Remarketing and behavioral targeting**

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application 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.

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 Remarketing (Meta Platforms Ireland Limited)**

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms Ireland Limited that connects the activity of this Application with the Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

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

### **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 this Application with the Google Ads advertising network and the DoubleClick Cookie.

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

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

Personal Data processed: Trackers; Usage Data.

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

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

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

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [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 Trackers with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Trackers; Usage Data.

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

## **Spam and bots protection**

This type of service analyzes the traffic of this Application, 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](#).

### **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](#).

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 this Application 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: Trackers; Usage Data.

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

## **Traffic optimization and distribution**

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

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

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 this Application, 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 this Application.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Application.

### **HubSpot CRM (HubSpot, Inc.)**

HubSpot CRM is a User database management service provided by HubSpot, Inc.

Personal Data processed: company name; country; Current City; email address; first name; last name; phone number; physical address; profession; purchase history; Usage Data; username; various types of Data as specified in the privacy policy of the service.

Place of processing: Germany – [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.

## **Cookie Policy**

This Application 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.

## **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.

## **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 Application 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 Application 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 Application and any third-party services may collect files that record interaction with this Application (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 Application 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 this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, 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 Application 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 Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

### **This Application**

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

### **Service**

The service provided by this Application 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.

### **Current City**

Provides access to the User's current location.

### **education history**

Provides access to education history.

### **work history**

Provides access to work history.

### **Legal information**

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

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

Latest update: March 11, 2024