Cookie Policy of Upfort

To find more information on California consumers and their privacy rights, Users may read the privacy policy.

To find more information on Virginia consumers and their privacy rights, Users may read the privacy policy.

To find more information on Colorado consumers and their privacy rights, Users may read the privacy policy.

To find more information on Connecticut consumers and their privacy rights, Users may read the privacy policy.

To find more information on Utah consumers and their privacy rights, Users may read the privacy policy.

This document informs Users about the technologies that help Upfort to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with Upfort.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent, depending on the applicable law. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Upfort uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

How Upfort uses Trackers

Necessary

Upfort uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

Technical Trackers

Trackers duration:

- __cf_bm: 30 minutes
- cfruid: duration of the session
- __cf_bm: 30 minutes
- cfruid: duration of the session
- ZD-suid: indefinite
- ZD-store: indefinite
- ZD-buid: indefinite
- storejs : indefinite
- __zlcstore: indefinite

Trackers managed directly by the Owner

Preference Cookies (Upfort)

Preference Cookies store the User preferences detected on Upfort in the local domain such as, for example, their timezone and region.

Personal Data processed: Trackers.

Trackers managed by third parties

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 Upfort.

Personal Data processed: IP address and Trackers.

Place of processing: Italy – <u>Privacy Policy</u>.

Trackers duration:

_iub_cs-*: 1 yearusprivacy: 1 year

Google Hosted Libraries (Google LLC)

Google Hosted Libraries is a traffic optimization and distribution service provided by Google LLC.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy.

Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC. 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 their partner policy and their Business Data page.

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

Place of processing: United States – Privacy Policy.

Trackers duration:

- GRECAPTCHA: duration of the session
- rc::a: indefinite
- rc::b: duration of the session
- rc::c: duration of the session
- rc::f: indefinite

Experience

Upfort uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

Trackers managed by third parties

Google Fonts (Google LLC)

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

Personal Data processed: Tracker and Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Measurement

Upfort uses Trackers to measure traffic and analyse User behaviour to improve the Service.

Trackers managed by third parties

Google Analytics 4 (Google LLC)

Google Analytics 4 is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of Upfort, 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 and Usage Data.

Place of processing: United States – Privacy Policy – Opt out.

Trackers duration:

- _ga: 2 years
- _ga_*: 2 years

Marketing

Upfort uses Trackers to deliver personalized ads or marketing content, and to measure their performance.

Trackers managed by third parties

Customer.io (Peaberry Software Inc.)

Customer.io is an email address management and message sending service provided by Peaberry Software Inc.

Personal Data processed: email address, Tracker and Usage Data.

Place of processing: United States – Privacy Policy.

Trackers that do not fit the above categorizations

California Consumer Privacy Act (CCPA) Data Deletion

If you would like your data deleted in conjunction with the California Consumer Privacy Act (CCPA), please email us at ccpa@upfort.com for processing

How to manage preferences and provide or withdraw consent on Upfort

Whenever the use of Trackers is based on consent, users can provide or withdraw such consent by setting or updating their preferences via the relevant privacy choices panel available on Upfort.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

How to control or delete Cookies and similar technologies via your device settings

Users may use their own browser settings to:

- See what Cookies or other similar technologies have been set on the device;
- Block Cookies or similar technologies;
- Clear Cookies or similar technologies from the browser.

The browser settings, however, do not allow granular control of consent by category.

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Microsoft Edge
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by YourOnlineChoices (EU and UK), the Network Advertising Initiative (US) and the Digital Advertising Alliance (US), DAAC (Canada), DDAI (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

Consequences of denying the use of Trackers

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help Upfort to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

Owner and Data Controller

Paladin Data Insurance Corp. dba Upfort 1990 N CALIFORNIA BLVD FL 8 1272 WALNUT CREEK, CA 94596

EU Representative

Instant EU GDPR Representative Ltd Represented by Adam Brogden Office 2 12A Lower Main Street, Lucan Co. Dublin K78 X5P8 Ireland Contact: contact@gdprlocal.com

UK Representative

GDPR Local Ltd
Represented by Adam Brogden
1st Floor Front Suite 27-29 North Street, Brighton England BN1 1EB
Contact: contact@gdprlocal.com

Owner contact email: contact@upfort.com

Since the use of third-party Trackers through Upfort cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by Upfort.

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 Upfort (or third-party services employed in Upfort), which can include: the IP addresses or domain names of the computers utilized by the Users who use Upfort, 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.

The individual using Upfort 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 Upfort. The Data Controller, unless otherwise specified, is the Owner of Upfort.

Upfort (or this Application)

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

Service

The service provided by Upfort 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 Upfort, if not stated otherwise within this document.

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