

Privacy Policy of zelusports.com

This Application collects some Personal Data from its Users.

This document contains [a section dedicated to Users in the United States and their privacy rights](#).

This document can be printed for reference by using the print command in the settings of any browser.

Owner and Data Controller

zelusports.com

Owner contact email: info@zelusports.com

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Usage Data; Tracker; first name; last name; email address; phone number; payment info; purchase history; billing address; company name; profession; physical address; country; state; county; ZIP/Postal code; various types of Data; city; User ID; website; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); device information; geography/region; number of Users ; number of sessions; session duration; In-app purchases; Application opens; Application updates; launches; operating systems; answers to questions; Data communicated while using the service; gender; date of birth; username; password; workplace; language; contact info; shipping address; profile picture; social media accounts ; Precise location permission (continuous); Precise location permission (non-continuous); Approximate location permission (continuous); Approximate location permission (non-continuous); Phone permission; Sensors permission; SMS permission; Storage permission; Reminders permission; Biometric Data access permission; Call permission; fax number; picture; prefix ; budget; academic background; number of employees; field of activity; house number; geographic position.

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: Platform services and hosting, Handling payments, Contacting the User, Access to third-party accounts, Interaction with external social networks and platforms, Analytics, Hosting and backend infrastructure, Managing data collection and online surveys, Displaying content from external platforms, Registration and authentication, Collection of privacy-related preferences, Device permissions for Personal Data access, Registration and authentication provided directly by this Application and Location-based interactions.

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".

Facebook permissions asked by this Application

This Application may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows this Application to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the [Facebook permissions documentation](#) and to the [Facebook privacy policy](#).

The permissions asked are the following:

Basic information

By default, this includes certain User's Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available.

Access Page CTA

Provides the access to manage call to actions on User-managed Pages.

Device permissions for Personal Data access

Depending on the User's specific device, this Application may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document.

The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of this Application.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by this Application.

Approximate location permission (continuous)

Used for accessing the User's approximate device location. This Application may collect, use, and share User location Data in order to provide location-based services.

Approximate location permission (non-continuous)

Used for accessing the User's approximate device location. This Application may collect, use, and share User location Data in order to provide location-based services.

The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for this Application to derive the approximate position of the User on a continuous basis.

Biometric Data access permission

Used for accessing the User's biometrical Data and/or authentication systems, such as for instance, FaceID.

Call permission

Used for accessing a host of typical features associated with telephony.

Phone permission

Used for accessing a host of typical features associated with telephony. This enables, for instance, read-only access to the “phone state”, which means it enables access to the phone number of the device, current mobile network information, or the status of any ongoing calls.

Precise location permission (continuous)

Used for accessing the User's precise device location. This Application may collect, use, and share User location Data in order to provide location-based services.

Precise location permission (non-continuous)

Used for accessing the User's precise device location. This Application may collect, use, and share User location Data in order to provide location-based services.

The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for this Application to derive the exact position of the User on a continuous basis.

Reminders permission

Used for accessing the Reminders app on the User's device, including the reading, adding and removing of entries.

Sensors permission

Used for accessing data from sensors that Users may use to measure what is happening inside their body, such as for instance, heart rate.

SMS permission

Used for accessing features related to the User's messaging including the sending, receiving and reading of SMS.

Storage permission

Used for accessing shared external storage, including the reading and adding of any items.

Detailed information on the processing of Personal Data

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

Access to third-party accounts

This type of service allows this Application to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically, but require explicit authorization by the User.

Facebook account access (Meta Platforms, Inc.)

This service allows this Application to connect with the User's account on the Facebook social network, provided by Facebook, Inc.

Permissions asked: Access Page CTA.

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

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

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 for Firebase (Google LLC)

Google Analytics for Firebase or Firebase Analytics is an analytics service provided by Google LLC.

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

Firebase Analytics may share Data with other tools provided by Firebase, such as Crash Reporting, Authentication, Remote Config or Notifications. The User may check this privacy policy to find a detailed explanation about the other tools used by the Owner.

This Application uses identifiers for mobile devices and technologies similar to cookies to run the Firebase Analytics service.

Users may opt-out of certain Firebase features through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Firebase related sections of this privacy policy, if available.

Personal Data processed: Application opens; Application updates; device information; geography/region; In-app purchases; launches; number of sessions; number of Users ; operating systems; session duration; Tracker; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

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

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; geolocation data.

This processing constitutes:

- a Sale in California

Collection of privacy-related preferences

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

iubenda Consent Solution (iubenda srl)

The iubenda Consent Solution allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.

In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; Tracker.

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

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

iubenda Cookie Solution (iubenda srl)

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

Personal Data processed: Tracker.

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

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

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; county; email address; first name; last name; phone number; physical address; profession; state; User ID; various types of Data; website; ZIP/Postal code.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; employment related information.

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; country; county; date of birth; email address; first name; gender; last name; phone number; physical address; profession; state; Tracker; Usage Data; website; ZIP/Postal code.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; biometric information; internet or other electronic network activity information; employment related information.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

Phone contact (this Application)

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

Personal Data processed: phone number.

Category of Personal Information collected according to the CCPA: identifiers.

Device permissions for Personal Data access

This Application requests certain permissions from Users that allow it to access the User's device Data as described below.

Device permissions for Personal Data access (this Application)

This Application requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Approximate location permission (continuous); Approximate location permission (non-continuous); Biometric Data access permission; Call permission; Phone permission; Precise location permission (continuous); Precise location permission (non-continuous); Reminders permission; Sensors permission; SMS permission; Storage permission.

Category of Personal Information collected according to the CCPA: biometric information; internet or other electronic network activity information; geolocation data.

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.

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 Maps widget (Google LLC)

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

Personal Data processed: Tracker; Usage Data.

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

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

This processing constitutes:

- a Sale in California

Handling payments

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

Apple Pay (Apple Inc.)

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

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; purchase history; Tracker; Usage Data; various types of Data as specified in the privacy policy of the service.

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

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

Google Pay (Google LLC)

Google Pay is a payment service provided by Google LLC, which allows users to make online payments using their Google credentials.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; purchase history; shipping address; Tracker; Usage Data; various types of Data as specified in the privacy policy of the service.

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

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

Payments processed via the Google Play Store (Google LLC)

This Application uses a payment service provided by Google LLC that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Google, as described in the [privacy policy for the Google Play store](#).

Personal Data processed: billing address; device information; email address; first name; last name; payment info; phone number; purchase history; Tracker; Usage Data.

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

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

Hosting and backend infrastructure

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

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.

Google App Engine (Google LLC)

Google App Engine is a hosting service provided by Google LLC.

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

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

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

Google Cloud Storage (Google LLC)

Google Cloud Storage is a hosting service provided by Google LLC.

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

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

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

Firebase Cloud Storage (Google LLC)

Firebase Cloud Storage is a hosting service provided by Google LLC.

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

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

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

Firebase Cloud Firestore (Google LLC)

Firebase Cloud Firestore is a hosting and backend service provided by Google LLC.

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

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

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

Firebase Hosting (Google LLC)

Firebase Hosting is a hosting service provided by Google LLC.

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

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

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

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.

The interaction and information obtained through this Application are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to log out from the respective services in order to make sure that the processed data on this Application isn't being connected back to the User's profile.

Facebook Like button and social widgets (Meta Platforms, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc.

Personal Data processed: Tracker; Usage Data.

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

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

This processing constitutes:

- a Sale in the United States

Location-based interactions

Geolocation (this Application)

This Application may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by this Application.

Personal Data processed: geographic position.

Category of Personal Information collected according to the CCPA: geolocation data.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana
- a Sharing in California
- Targeted Advertising in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

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.

Google Forms (Google LLC)

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

Personal Data processed: answers to questions; city; company name; contact info; country; Data communicated while using the service; date of birth; email address; first name; gender; language; last name; password; phone number; physical address; profession; state; Tracker; Usage Data; username; workplace; ZIP/Postal code.

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

Category of Personal Information collected according to the CCPA: identifiers; commercial information; biometric information; internet or other electronic network activity information; employment related information; inferences drawn from other personal information.

This processing constitutes:

- a Sale in California

Platform services and hosting

These services have the purpose of hosting and running key components of this Application, therefore allowing the provision of this Application from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Apple App Store (Apple Inc.)

This Application is distributed on Apple's App Store, a platform for the distribution of mobile apps, provided by Apple Inc.

By virtue of being distributed via this app store, Apple collects basic analytics and provides reporting features that enables the Owner to view usage analytics data and measure the performance of this Application. Much of this information is processed on an opt-in basis.

Users may opt-out of this analytics feature directly through their device settings. More information on how to manage analysis settings can be found on [this page](#).

Personal Data processed: Usage Data.

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

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

Google Play Store (Google LLC)

This Application is distributed on the Google Play Store, a platform for the distribution of mobile apps, provided by Google LLC.

By virtue of being distributed via this app store, Google collects usage and diagnostics data and share aggregate information with the Owner. Much of this information is processed on an opt-in basis.

Users may opt-out of this analytics feature directly through their device settings. More information on how to manage analysis settings can be found on [this page](#).

Personal Data processed: Usage Data.

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

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

Registration and authentication

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Google OAuth (Google LLC)

Google OAuth is a registration and authentication service provided by Google LLC and is connected to the Google network.

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

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

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

This processing constitutes:

- a Sale in the United States

Firebase Authentication (Google LLC)

Firebase Authentication is a registration and authentication service provided by Google LLC. To simplify the registration and authentication process, Firebase Authentication can make use of third-party identity providers and save the information on its platform.

Personal Data processed: email address; first name; last name; password; phone number; profile picture; social media accounts ; username.

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

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information; audio, electronic, visual, thermal, olfactory, or similar information.

This processing constitutes:

- a Sale in California

Facebook Oauth (Meta Platforms, Inc.)

Facebook Oauth is a registration and authentication service provided by Meta Platforms, Inc. and is connected to the Facebook social network.

Personal Data processed: Tracker; various types of Data.

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

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

This processing constitutes:

- a Sale in California

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: academic background; billing address; budget; city; company name; country; county; date of birth; email address; fax number; field of activity; first name; gender; house number; language; last name; number of employees; password; phone number; physical address; picture; prefix ; profession; profile picture; state; Usage Data; User ID; username; various types of Data; website; workplace; ZIP/Postal code.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; biometric information; internet or other electronic network activity information; audio, electronic, visual, thermal, olfactory, or similar information; employment related information; inferences drawn from other personal information.

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 the United States

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

The information contained in this section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are residents in the following states: **California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana.**

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).

Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.

Internet or other electronic network activity information

Personal Information collected or disclosed: Usage Data, various types of Data as specified in the privacy policy of the service, Tracker, first name, last name, email address, phone number, purchase history, billing address, company name, profession, physical address, country, state, county, ZIP/Postal code, various types of Data, city, User ID, website, Access Page CTA, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users , number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, answers to questions, Data communicated while using the service, gender, date of birth, workplace, language, contact info, shipping address, profile picture, social media accounts , Approximate location permission (continuous), Approximate location permission (non-continuous), Phone permission, Sensors permission, SMS permission, Storage permission, Reminders permission, Call permission, fax number, picture, prefix , budget, academic background, number of employees, field of activity, house number

Sensitive Personal Information collected or disclosed ⓘ: payment info, username, password, Precise location permission (continuous), Precise location permission (non-continuous), Biometric Data access permission

Purposes:

- Platform services and hosting
- Handling payments
- Contacting the User
- Access to third-party accounts
- Interaction with external social networks and platforms
- Analytics
- Hosting and backend infrastructure
- Managing data collection and online surveys
- Displaying content from external platforms
- Registration and authentication
- Collection of privacy-related preferences
- Device permissions for Personal Data access
- Registration and authentication provided directly by this Application

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Apple Inc., Meta Platforms, Inc., Google LLC, iubenda srl

Service providers or contractors: this Application

Identifiers

Personal Information collected or disclosed: various types of Data as specified in the privacy policy of the service, Tracker, Usage Data, first name, last name, email address, phone number, purchase history, billing address, company name, profession, physical address, country, state, county, ZIP/Postal code, various types of Data, city, User ID, website, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users , number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, answers to questions, Data communicated while using the service, gender, date of birth, workplace, language, contact info, shipping address, profile picture, social media accounts , fax number, picture, prefix , budget, academic background, number of employees, field of activity, house number

Sensitive Personal Information collected or disclosed ⓘ: payment info, username, password

Purposes:

- Handling payments
- Contacting the User
- Analytics
- Managing data collection and online surveys
- Registration and authentication
- Registration and authentication provided directly by this Application

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Apple Inc., Google LLC

Service providers or contractors: this Application

Commercial information

Personal Information collected or disclosed: various types of Data as specified in the privacy policy of the service, Tracker, Usage Data, first name, last name, email address, phone number, purchase history, billing address, company name, profession, physical address, country, state, county, ZIP/Postal code, various types of Data, city, User ID, website, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users , number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, answers to questions, Data communicated while using the service, gender, date of birth, workplace, language, contact info, shipping address, fax number, picture, prefix , profile picture, budget, academic background, number of employees, field of activity, house number

Sensitive Personal Information collected or disclosed ⓘ: payment info, username, password

Purposes:

- Handling payments
- Contacting the User
- Analytics
- Managing data collection and online surveys
- Registration and authentication provided directly by this Application

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Apple Inc., Google LLC

Service providers or contractors: this Application

Employment related information

Personal Information collected or disclosed: first name, last name, phone number, company name, profession, physical address, country, state, county, email address, ZIP/Postal code, various types of Data, city, User ID, website, answers to questions, Data communicated while using the service, Tracker, Usage Data, gender, date of birth, workplace, language, contact info, fax number, picture, prefix , profile picture, budget, academic background, number of employees, billing address, field of activity, house number

Sensitive Personal Information collected or disclosed ⓘ: username, password

Purposes:

- Contacting the User
- Managing data collection and online surveys
- Registration and authentication provided directly by this Application

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Google LLC

Service providers or contractors: this Application

Geolocation data

Personal Information collected or disclosed: Tracker, Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), device information, geography/region, number of Users , number of sessions, session duration, In-app purchases, Application opens, Application updates, launches, operating systems, Approximate location permission (continuous), Approximate location permission (non-continuous), Phone permission, Sensors permission, SMS permission, Storage permission, Reminders permission, Call permission, geographic position

Sensitive Personal Information collected or disclosed ⓘ: Precise location permission (continuous), Precise location permission (non-continuous), Biometric Data access permission

Purposes:

- Analytics
- Device permissions for Personal Data access
- Location-based interactions

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Google LLC

Service providers or contractors: this Application

Biometric information

Personal Information collected or disclosed: answers to questions, Data communicated while using the service, Tracker, Usage Data, first name, last name, gender, date of birth, phone number, physical address, email address, company name, profession, country, state, ZIP/Postal code, city, workplace, language, contact info, county, website, Approximate location permission (continuous), Approximate location permission (non-continuous), Phone permission, Sensors permission, SMS permission, Storage permission, Reminders permission, Call permission, fax number, picture, prefix , profile picture, budget, User ID, academic background, number of employees, billing address, field of activity, house number, various types of Data

Sensitive Personal Information collected or disclosed ⓘ: username, password, Precise location permission (continuous), Precise location permission (non-continuous), Biometric Data access permission

Purposes:

- Managing data collection and online surveys
- Contacting the User
- Device permissions for Personal Data access
- Registration and authentication provided directly by this Application

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Google LLC

Service providers or contractors: this Application

Inferences drawn from other personal information

Personal Information collected or disclosed: answers to questions, Data communicated while using the service, Tracker, Usage Data, first name, last name, gender, date of birth, phone number, physical address, email address, company name, profession, country, state, ZIP/Postal code, city, workplace, language, contact info, county, fax number, picture, prefix , profile picture, website, budget, User ID, academic background, number of employees, billing address, field of activity, house number, various types of Data

Sensitive Personal Information collected or disclosed ⓘ: username, password

Purposes:

- Managing data collection and online surveys
- Registration and authentication provided directly by this Application

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Google LLC

Service providers or contractors: this Application

Audio, electronic, visual, thermal, olfactory, or similar information

Personal Information collected or disclosed: first name, last name, phone number, email address, profile picture, social media accounts , Usage Data, gender, date of birth, physical address, company name, profession, country, state, county, fax number, ZIP/Postal code, city, picture, prefix , workplace, website, budget, User ID, academic background, number of employees, billing address, field of activity, house number, language, various types of Data

Sensitive Personal Information collected or disclosed ⓘ: username, password

Purposes:

- Registration and authentication
- Registration and authentication provided directly by this Application

Retention period: for the time necessary to fulfill the purpose

Sold or Shared ⓘ: Yes

Targeted Advertising: ⓘ: Yes

Third-parties: Google LLC

Service providers or contractors: this Application

ⓘ You can read the definitions of these concepts inside the “[Definitions and legal references section](#)” of the privacy policy.

To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information (“Limit the Use of My Sensitive Personal Information”) you can refer to the “[Your privacy rights under US state laws](#)” section of our privacy policy.

For more details on the collection of Personal Information, please read the section “[Detailed information on the processing of Personal Data](#)” of our privacy policy.

We won’t process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use this Application.

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

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

Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- **the right to request the deletion of your Personal Information.** You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;
- **the right to opt out from the Sale of your Personal Information;** We will not discriminate against you for exercising your privacy rights.
- **the right to non-discrimination.**

Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have:

- **The right to opt out of the Sharing of your Personal Information** for cross-context behavioral advertising;
- **The right to request to limit our use or disclosure of your Sensitive Personal Information** to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and Montana you have

- **The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- **The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer. In Maryland, your Sensitive Personal Information will be collected or processed only if strictly necessary to provide or maintain a specific product or service requested by you.

In Minnesota and Maryland Users also have the right to obtain a list of the specific third parties to which the controller has disclosed the consumer's personal data

* Note that in some states like Minnesota you have the following specific rights connected to profiling:

- The right to question the results of the profiling;
- The right to be informed of the reason that the profiling resulted in the decision; if feasible
- The right to be informed of what actions the consumer might have taken to secure a different decision and the actions that the consumer might take to secure a different decision in the future;
- The right to review personal data used in the profiling;
- If inaccurate, the right to have the data corrected and the profiling decision reevaluated based on the corrected data;

Additional rights for users residing in Utah and Iowa

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah and Iowa, you have:

- **The right to opt out of** the processing of your Personal Information for **Targeted Advertising**;
- **The right to opt out of the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

How to exercise your privacy rights under US state laws

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

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

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

How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on this Application.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request in a frictionless manner.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

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

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) / Personal Information (or Information)

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.

Sensitive Personal Information

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

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.

Sale

Sale means any exchange of Personal Information by the Owner to a **third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

Sharing

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioral advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

Targeted advertising

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across nonaffiliated websites or online applications to predict such consumer's preferences or interests, as defined by the applicable privacy US state law.

European Union (or EU)

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

Cookie

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

Tracker

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

Legal information

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

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

Latest update: January 09, 2023