

# Privacy Policy of Diwan Diaspora Network

This Website collects some Personal Data from its Users.

## Owner and Data Controller

Diwan Diaspora Network

**Owner contact email:** [contact@iranians.global](mailto:contact@iranians.global)

## Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: first name; last name; gender; date of birth; phone number; VAT Number; company name; profession; physical address; fax number; country; state; county; email address; ZIP/Postal code; various types of Data; city; Tax ID; field of activity; User ID; number of employees; website; Usage Data; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); username; Universally unique identifier (UUID); general activity data; body measurements & indexes; movement activity; food related activity ; sleeping activity; heart rate and other vital data; blood type; payment info; geographic position; Full access; Read only access; Read metadata; Modify; Insert and import; Compose; Basic settings management; Sensitive settings management; budget; academic background; billing address; picture; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Data communicated while using the service; password; profile picture; device information; screenshots; workplace; purchase history; shipping address; language; number of Users; session statistics; latitude (of city); longitude (of city); browser information; Data communicated in order to use the Service; Calendar permission; Contacts permission; Camera permission; Precise location permission (continuous); Precise location permission (non-continuous); Approximate location permission (continuous); Approximate location permission (non-continuous); Microphone permission; Phone permission; Sensors permission; SMS permission; Storage permission; Reminders permission; HomeKit permission; Motion sensors permission; Bluetooth sharing permission; Social media accounts permission; Microphone permission, without recording; NFC Reader permission ; Biometric Data access permission; Media Library permission (Music); Photo Library permission; Health Data read permission; Health Data update permission ; Siri permission; Apple's speech recognition servers permission; TV Provider permission ; Google Assistant permission; Google Home permission; Call permission; Camera permission, without saving or recording; Write-only Photo Library permission; name; marital status; social media accounts ; user content; contact info; Social Security number (SSN); house number; prefix ; data relating to the point of sale; Twitter handle.

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

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website. Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

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

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

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

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

## **Retention time**

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

## **The purposes of processing**

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, Interaction with external social networks and platforms, Analytics, Displaying content from external platforms, Content commenting, Data transfer outside the EU, Handling activity data, Handling payments, Hosting and backend infrastructure, Infrastructure monitoring, Location-based interactions, Platform services and hosting, Registration and authentication, Registration and authentication provided directly by this Website, Remarketing and behavioral targeting, Social features, SPAM protection, Tag Management, Traffic optimization and distribution, Handling activities related to productivity, Data transfer outside of the UK, Advertising, Connecting Data, Access to third-party accounts, Collection of privacy-related preferences, Content performance and features testing (A/B testing), Device permissions for Personal Data access, Managing contacts and sending messages and Managing data collection and online surveys.

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".

## **Device permissions for Personal Data access**

Depending on the User's specific device, this Website 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 Website.

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 Website.

### **Apple's speech recognition servers permission**

Used for sending the User's Data to Apple's speech recognition servers.

### **Approximate location permission (continuous)**

Used for accessing the User's approximate device location. This Website 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 Website 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 Website 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.

### **Bluetooth sharing permission**

Used for accessing Bluetooth related functions such as scanning for devices, connecting with devices, and allowing data transfer between devices.

### **Calendar permission**

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

### **Call permission**

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

### **Camera permission**

Used for accessing the camera or capturing images and video from the device.

### **Camera permission, without saving or recording**

Used for accessing the camera or capturing images and video from the device.  
This Website does not save or record the camera output.

### **Contacts permission**

Used for accessing contacts and profiles on the User's device, including the changing of entries.

### **Google Assistant permission**

Used for sending the User's Data to Google Assistant (an artificial intelligence-powered virtual assistant).

### **Google Home permission**

Used for accessing the Google Home and Chromecast devices and enabling this Website to interact with physical accessories in the User's surrounding environment.

### **Health Data read permission**

Allows reading the User's health Data.

### **Health Data update permission**

Allows the updating of the User's health Data.

### **HomeKit permission**

Used for accessing the HomeKit framework and enabling this app to interact with physical accessories in the User's surrounding environment.

### **Media Library permission (Music)**

Allows accessing the User's Media Library audio Data.

### **Microphone permission**

Allows accessing and recording microphone audio from the User's device.

### **Microphone permission, without recording**

Allows accessing and recording microphone audio from the User's device. The recording feature is not used on this Website.

### **Motion sensors permission**

Used for accessing the User's device motion sensors to measure the User's activity such as step counts, stairs climbed, and movement type (walking, cycling, etc.).

### **NFC Reader permission**

Allows this Website to read contact-less tags.

### **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.

### **Photo Library permission**

Allows access to the User's Photo Library.

### **Precise location permission (continuous)**

Used for accessing the User's precise device location. This Website 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 Website 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 Website 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.

### **Siri permission**

Used for sending the User's Data to Siri (an artificial intelligence-powered virtual assistant).

### **SMS permission**

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

### **Social media accounts permission**

Used for accessing the User's social media account profiles, such as Facebook and Twitter.

### **Storage permission**

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

### **TV Provider permission**

Allows accessing the User's TV provider account.

### **Write-only Photo Library permission**

Allows write-only access to the User's photo library.

## **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 Website 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.

### **Twitter account access (X Corp.)**

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

Personal Data processed: Data communicated while using the service; device information; email address; first name; last name; Trackers; Usage Data; username.

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

## **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 Website, 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 Website. 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.

### **JW Player (LongTail Ad Solutions, Inc. )**

JW Player is an advertising service provided by LongTail Ad Solutions, Inc. .

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [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**

Google Analytics is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of this Website, 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.

Personal Data processed: Trackers; Usage Data.

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

### **Google Analytics Demographics and Interests reports**

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

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

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

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

### **Wordpress Stats**

Wordpress Stats is an analytics service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing.

Personal Data processed: Trackers; Usage Data.

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

## **Yandex Metrica (YANDEX, LLC)**

Yandex Metrica is an analytics and heat mapping service provided by YANDEX, LLC.

Yandex Metrica is used to display the areas of this Website that Users interact with most frequently. This shows where the points of interest are.

Personal Data processed: Trackers; Usage Data.

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

## **Business Contact (Italiaonline S.p.A.)**

Business Contact is an analytics service provided by Italiaonline S.p.A.

Personal Data processed: Trackers; Usage Data.

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

## **Google Analytics with anonymized IP**

Google Analytics is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, (“Google”). Google utilizes the Data collected to track and examine the use of this Website, 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.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Trackers; Usage Data.

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

## **Cloudflare Web Analytics (Cloudflare Inc.)**

Cloudflare Web Analytics is an anonymized analytics service provided by Cloudflare Inc. that gives the Owner insight into the use of this Website by Users without needing to identify them. Further information may be found [here](#) and within the service's privacy policy.

Personal Data processed: device information; language; Usage Data.

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

## **Google Analytics 4**

Google Analytics 4 is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, (“Google”). Google utilizes the Data collected to track and examine the use of this Website, 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: browser information; city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data.

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

## **YouTube Analytics and Reporting API**

YouTube Analytics and Reporting API is a video content analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Through this Service, this Website 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; device information; Trackers; Usage Data; User ID; username.

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

## **Collection of privacy-related preferences**

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

### **iubenda Consent Database (iubenda srl)**

The iubenda Consent Database 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; Trackers.

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

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

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

Personal Data processed: Trackers.

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

## **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; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; language; last name; password; phone number; picture; profession; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

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

## **Contacting the User**

### **Contact form (this Website)**

By filling in the contact form with their Data, the User authorizes this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: city; company name; country; county; date of birth; email address; fax number; field of activity; first name; gender; last name; number of employees; phone number; physical address; profession; state; Tax ID; Trackers; Usage Data; User ID; various types of Data; VAT Number; website; ZIP/Postal code.

### **Phone contact (this Website)**

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

Personal Data processed: phone number.

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

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

Personal Data processed: city; company name; country; county; date of birth; email address; first name; gender; last name; phone number; physical address; profession; state; Trackers; Usage Data; website; ZIP/Postal code.

## **Content commenting**

Content commenting services allow Users to make and publish their comments on the contents of this Website.

Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

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

This Website has its own internal content comment system.

Personal Data processed: email address; first name; last name; phone number; Trackers; Usage Data; username; website.

### **Facebook Comments**

Facebook Comments is a content commenting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, enabling the User to leave comments and share them on the Facebook platform.

Personal Data processed: Trackers; Usage Data.

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

## **Content performance and features testing (A/B testing)**

The services contained in this section allow 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 this Website.

### **Google Optimize**

Google Optimize is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google").

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Trackers; Usage Data.

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

## **Data transfer outside the EU**

The Owner is allowed to transfer Personal Data collected within the EU to third countries (i.e. any country not part of the EU) only pursuant to a specific legal basis. Any such Data transfer is based on one of the legal bases described below.

Users can inquire with the Owner to learn which legal basis applies to which specific service.

### **Data transfer abroad based on consent (this Website)**

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

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

Personal Data processed: various types of Data.

### **Data transfer abroad based on standard contractual clauses (this Website)**



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

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

Personal Data processed: various types of Data.

#### **Data transfer from the EU and/or Switzerland to the U.S based on Privacy Shield (this Website)**

If this is the legal basis, the transfer of Personal Data from the EU or Switzerland to the US is carried out according to the EU - U.S. and Swiss - U.S. Privacy Shield.

In particular, Personal Data is transferred to services that self-certify under the Privacy Shield framework and therefore guarantee an adequate level of protection of such transferred Data. All services are listed within the relevant section of this document and those that adhere to Privacy Shield can be singled out by checking their privacy policy and possibly also by specifically checking for Privacy Shield adherence in the official Privacy Shield List. Privacy Shield also specifically guarantees rights to Users which can be found in its most current form on the website run by the US Department of Commerce.

Personal Data may be transferred from within the EU or Switzerland to the U.S. to services that are not, or not anymore, part of Privacy Shield, only based on other valid legal grounds. Users can ask the Owner to learn about such legal grounds.

Personal Data processed: various types of Data.

#### **Data transfer to countries that guarantee European standards (this Website)**

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.

The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

Personal Data processed: various types of Data.

#### **Other legal basis for Data transfer abroad (this Website)**

If no other legal basis applies, Personal Data shall be transferred from the EU to third countries only if at least one of the following conditions is met:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent;
- the data transferred is sourced from a public register created under the law of the country that the data originates from;
- subject to further conditions, the Owner has a compelling legitimate interest to perform a one-off transfer of Personal Data.

In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Website.

Personal Data processed: various types of Data.

#### **Device permissions for Personal Data access**

This Website 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 Website)**

This Website 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: Apple's speech recognition servers permission; Approximate location permission (continuous); Approximate location permission (non-continuous); Biometric Data access permission; Bluetooth sharing permission; Calendar permission; Call permission; Camera permission; Camera permission, without saving or recording; Contacts permission; Google Assistant permission; Google Home permission; Health Data read permission; Health Data update permission; HomeKit permission; Media Library permission (Music); Microphone permission; Microphone permission, without recording; Motion sensors permission; NFC Reader permission; Phone permission; Photo Library permission; Precise location permission

(continuous); Precise location permission (non-continuous); Reminders permission; Sensors permission; Siri permission; SMS permission; Social media accounts permission; Storage permission; TV Provider permission ; Write-only Photo Library permission.

## **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

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

### **Google Fonts**

Google Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

### **Font Awesome (Fonticons, Inc. )**

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

### **GitHub button and social widgets (GitHub Inc.)**

The GitHub button and social widgets are services allowing interaction with the GitHub and Gist services provided by GitHub, Inc.

Personal Data processed: Usage Data.

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

### **Google Maps widget**

Google Maps is a maps visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

### **Gravatar**

Gravatar is an image visualization service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Please note that if Gravatar images are used for comment forms, the commenter's email address or parts of it may be sent to Gravatar - even if the commenter has not signed up for that service.

Personal Data processed: email address; Usage Data.

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

### **Instagram widget**

Instagram is an image visualization service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

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

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

Personal Data processed: Trackers; Usage Data.

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

#### **YouTube video widget**

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

#### **YouTube video widget (Privacy Enhanced Mode)**

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages. This widget is set up in a way that ensures that YouTube won't store information and cookies about Users on this Website unless they play the video.

Personal Data processed: Trackers; Universally unique identifier (UUID); Usage Data.

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

#### **Google Programmable Search Engine**

Google Programmable Search Engine is a search engine embedding service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

#### **JWPlayer widget (LongTail Ad Solutions, Inc. )**

JWPlayer is a video content visualization service provided by LongTail Ad Solutions, Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

#### **Adobe Fonts (Adobe Systems Incorporated)**

Adobe Fonts is a typeface visualization service provided by Adobe Systems Incorporated that allows this Website to incorporate content of this kind on its pages.

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

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

#### **YouTube IFrame Player**

YouTube IFrame Player is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Through this Service, this Website 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; device information; Trackers; Usage Data; User ID; username.

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

### **Google Calendar widget**

Google Calendar widget is a calendar content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

### **SoundCloud widget (SoundCloud Limited)**

Soundcloud is an audio content delivery service provided by SoundCloud Limited that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Usage Data.

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

### **Spotify widget (Spotify AB)**

Spotify is an audio content delivery service provided by Spotify AB that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

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

### **YouTube Data API**

YouTube Data API is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate functions normally executed on YouTube so that Users can watch, find, and manage YouTube content directly on this Website.

Through this Service, this Website 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; device information; Trackers; Usage Data; User ID; username.

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

### **Handling activities related to productivity**

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

### **Google Workspace**

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

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; last name; password; phone number; physical address;

profession; profile picture; screenshots; Trackers; Usage Data; username; VAT Number; workplace.

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

## **Gmail**

Gmail is a service that manages email communication provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. Such email communication is not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside this service for advertising purposes in any other way.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; email address; first name; gender; geographic position; last name; phone number; physical address; profession; profile picture; screenshots; Trackers; Usage Data; username; VAT Number; workplace.

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

## **Airtable (Formagrid, Inc.)**

Airtable is an online spreadsheet and collaboration service provided by Formagrid, Inc.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; device information; email address; first name; gender; geographic position; last name; phone number; physical address; profession; profile picture; screenshots; Trackers; Usage Data; username; VAT Number; workplace; ZIP/Postal code.

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

## **Handling activity data**

This type of service allows the Owner to use the activity data collected by your device in order for this Website to operate or to provide specific features. This may include movements, heartbeat, change in altitude or data about the surroundings. Depending on what is described below, third parties may be involved in the activity tracking. Most devices allow for the User to control which Data is accessed or stored.

### **Activity data tracked by your device (this Website)**

This Website uses some activity data tracked by your device to operate or to provide specific features.

Personal Data processed: blood type; body measurements & indexes; date of birth; food related activity ; gender; general activity data; heart rate and other vital data; movement activity; sleeping activity.

## **Handling payments**

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

### **Payment by bank transfer (this Website)**

In the event that the chosen payment method is a direct bank transfer to the current account indicated by this Website, the Owner will collect the payment details of the User, i. e. the current account number of the sender, the SWIFT code, the bank and the name of the sender. Such data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data processed: company name; first name; last name; payment info; physical address.

## **PayPal (PayPal Inc.)**

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

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

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

## **Stripe**

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

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

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

### **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; shipping address; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

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

## **Hosting and backend infrastructure**

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

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.

### **GitHub Pages (GitHub Inc.)**

GitHub Pages is a hosting service provided by GitHub, Inc.

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

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

### **DigitalOcean (DigitalOcean Inc.)**

DigitalOcean is a hosting service provided by DigitalOcean Inc.

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

Place of processing: United States – [Privacy Policy](#); Canada – [Privacy Policy](#); United Kingdom – [Privacy Policy](#); Netherlands – [Privacy Policy](#); Germany – [Privacy Policy](#); India – [Privacy Policy](#); Singapore – [Privacy Policy](#).

## **Infrastructure monitoring**

This type of service allows this Website to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of this Website.

### **Pingdom (Pingdom AB)**

Pingdom is a monitoring service provided by Pingdom AB.

Personal Data processed: Trackers; Usage Data.

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

## **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website. The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on this Website isn't being connected back to the User's profile.

### **Facebook Like button and social widgets**

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing,

Personal Data processed: Trackers; Usage Data.

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

#### **LinkedIn button and social widgets (LinkedIn Corporation)**

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Trackers; Usage Data.

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

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

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

Personal Data processed: Trackers; Usage Data.

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

#### **YouTube button and social widgets**

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Usage Data.

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

#### **PayPal button and widgets (PayPal Inc.)**

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

#### **Reddit button and widgets (reddit inc.)**

The reddit button and widgets are services allowing interaction with the reddit platform provided by reddit inc.

Personal Data processed: Trackers; Usage Data.

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

#### **Pinterest “Pin it” button and social widgets (Pinterest, Inc.)**

The Pinterest “Pin it” button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc.

Personal Data processed: Trackers; Usage Data.

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

### **Location-based interactions**

#### **Geolocation (this Website)**

This Website 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 Website.



Personal Data processed: geographic position.

## **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

### **Mailchimp (Intuit Inc.)**

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

Personal Data processed: company name; country; Data communicated while using the service; date of birth; email address; first name; gender; last name; phone number; physical address; Trackers; Usage Data; username; various types of Data.

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

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

This type of service allows this Website 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.

### **Data provided via online forms, managed directly (this Website)**

This Website makes use of online forms that can be used to collect Data about Users.

Personal Data processed: answers to questions; billing address; city; company name; contact info; country; date of birth; email address; first name; gender; language; last name; marital status; name; payment info; phone number; physical address; profession; profile picture; social media accounts ; Trackers; Usage Data; user content; workplace.

## **Platform services and hosting**

These services have the purpose of hosting and running key components of this Website, therefore allowing the provision of this Website 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.

### **WordPress.com**

WordPress.com is a platform provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, that allows the Owner to build, run and host this Website.

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

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

## **Registration and authentication**

By registering or authenticating, Users allow this Website 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 Website 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.

### **YouTube OAuth**

YouTube OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the YouTube network.



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

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

### **Facebook Authentication**

Facebook Authentication is a registration and authentication service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

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

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

### **GitHub OAuth (GitHub Inc.)**

GitHub OAuth is a registration and authentication service provided by GitHub Inc. and is connected to the GitHub network.

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

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

### **Google OAuth**

Google OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, 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](#); Ireland – [Privacy Policy](#).

### **Gmail permissions to access User Data (OAuth addition)**

To provide its service, this Website uses restricted scopes for Gmail which allow access to User Data related to this Google service (as indicated below). This access is provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, [under strict terms](#). Here's what this means for such User Data:

- The use of User Data is limited to providing or improving User-facing features. User Data will not be used for serving ads, including retargeting, personalized, or interest-based advertising.
- User Data will be transferred to third parties only if necessary, to provide or improve User-facing features and as necessary to comply with applicable law or as part of a merger, acquisition, or sale of assets with notice to Users.
- Humans will not read the Data unless:
  - the Owner has obtained the User's affirmative agreement for specific messages;
  - it is necessary for security purposes and/or to comply with applicable law, or;
  - the use is limited to internal operations and the Data (including derivations) have been aggregated and anonymized.

Personal Data processed: Basic settings management; Compose; Full access; Insert and import; Modify; Read metadata; Read only access; Sensitive settings management.

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

### **Twitter OAuth (X Corp.)**

Twitter OAuth is a registration and authentication service provided by Twitter, Inc. and is connected to the Twitter social network.

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

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

### **Linkedin OAuth (LinkedIn Corporation)**

Linkedin OAuth is a registration and authentication service provided by LinkedIn Corporation and is connected to the LinkedIn social network.

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

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

## **WordPress.com Single Sign On**

WordPress.com Single Sign On is a registration and authentication service provided by Automattic Inc. or by Automattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, and is connected to the WordPress.com network.

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

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

## **Facebook OAuth**

Facebook OAuth is a registration and authentication service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: Trackers; various types of Data.

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

## **Twitch.tv Authentication (Twitch Interactive, Inc.)**

Twitch.tv Authentication is a registration and authentication service provided by Twitch Interactive, Inc.

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

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

## **Direct registration and profiling (this Website)**

By registering or authenticating directly through this Website, Users allow this Website to identify them and give them access to dedicated services. The Owner may process Data collected when Users register or authenticate also for targeting and profiling purposes; to find out more, Users can contact the Owner using the contact details provided in this document.

Personal Data processed: billing address; budget; company name; country; county; data relating to the point of sale; date of birth; email address; fax number; field of activity; first name; gender; geographic position; house number; language; last name; marital status; number of employees; password; phone number; physical address; picture; prefix ; profession; profile picture; shipping address; Social Security number (SSN); state; Tax ID; Trackers; Twitter handle; Usage Data; User ID; username; various types of Data; VAT Number; website; workplace; ZIP/Postal code.

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

By registering or authenticating, Users allow this Website 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 Website)**

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

Personal Data processed: academic background; billing address; budget; city; company name; country; county; date of birth; physical address; Trackers.

## **Remarketing and behavioral targeting**

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

### **Remarketing with Google Analytics**

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, 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: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

### **Google Ads Remarketing**

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Website 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: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

### **Social features**

#### **Public profile (this Website)**

Users may have public profiles that other Users can display. In addition to the Personal Data provided, this profile may contain Users' interactions with this Website.

Personal Data processed: city; company name; country; county; date of birth; email address; first name; gender; geographic position; last name; phone number; physical address; picture; profession; state; username.

### **SPAM protection**

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

#### **Akismet**

Akismet is a SPAM protection service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing.

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

### **Google reCAPTCHA**

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

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: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

### **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on this Website 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 Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Usage Data.

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

## Traffic optimization and distribution

This type of service allows this Website to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Website and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

### Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

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

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

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

## Information on opting out of interest-based advertising

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

## Further information about the processing of Personal Data

### Analysis and predictions based on the User's Data ("profiling")

The Owner may use the Personal and Usage Data collected through this Website to create or update User profiles. This type of Data processing allows the Owner to evaluate User choices, preferences and behaviour for the purposes outlined in the respective section of this document.

User profiles can also be created through the use of automated tools like algorithms, which can also be provided by third parties. To find out more about the profiling activities performed, Users can check the relevant sections of this document.

The User always has a right to object to this kind of profiling activity. To find out more about the User's rights and how to exercise them, the User is invited to consult the section of this document outlining the rights of the User.

### Automated decision-making

Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on the User, is taken solely by technological means, without any human intervention. This Website may use the User's Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. This Website adopts automated decision-making processes as far as necessary to enter into or perform a contract between User and Owner, or on the basis of the User's explicit consent, where such consent is required by the law.

Automated decisions are made by technological means – mostly based on algorithms subject to predefined criteria – which may also be provided by third parties.

The rationale behind the automated decision making is:

- to enable or otherwise improve the decision-making process;
- to grant Users fair and unbiased treatment based on consistent and uniform criteria;
- to reduce the potential harm derived from human error, personal bias and the like which may potentially lead to discrimination or imbalance in the treatment of individuals etc.;
- to reduce the risk of User's failure to meet their obligation under a contract. To find out more about the purposes, the third-party services, if any, and any specific rationale for automated decisions used within this Website, Users can check the relevant sections in this document.

### Consequences of automated decision-making processes for Users and rights of Users subjected to it

As a consequence, Users subject to such processing, are entitled to exercise specific rights aimed at preventing or otherwise limiting the potential effects of the automated decisions taken.

In particular, Users have the right to:

- obtain an explanation about any decision taken as a result of automated decision-making and express their point of view regarding this decision;
- challenge a decision by asking the Owner to reconsider it or take a new decision on a different basis;
- request and obtain from the Owner human intervention on such processing.

To learn more about the User's rights and the means to exercise them, the User is invited to consult the section of this document relating to the rights of the User.

## **Personal Data collected through sources other than the User**

The Owner of this Website may have legitimately collected Personal Data relating to Users without their knowledge by reusing or sourcing them from third parties on the grounds mentioned in the section specifying the legal basis of processing. Where the Owner has collected Personal Data in such a manner, Users may find specific information regarding the source within the relevant sections of this document or by contacting the Owner.

## **Push notifications**

This Website may send push notifications to the User to achieve the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for this Website, some or all of the apps on the particular device. Users must be aware that disabling push notifications may negatively affect the utility of this Website.

## **Push notifications based on the User's geographic location**

This Website may use the User's geographic location to send push notifications for the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then changing those settings for some or all of the apps on the particular device.

Users must be aware that disabling push notifications may negatively affect the utility of this Website.

## **Push notifications for direct marketing**

This Website may send push notifications to the User for the purpose of direct marketing (to propose services and products provided by third parties or unrelated to the product or service provided by this Website).

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then changing those settings for this Website or all of the apps on the particular device.

Users must be aware that disabling push notifications may negatively affect the utility of this Website.

Besides applicable device settings, the User may also make use of the rights described under User rights in the relevant section of this privacy policy.

## **Selling goods and services online**

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Website depends on the payment system used.

## **User identification via a universally unique identifier (UUID)**

This Website may track Users by storing a so-called universally unique identifier (or short UUID) for analytics purposes or for storing Users' preferences. This identifier is generated upon installation of this Application, it persists between Application launches and updates, but it is lost when the User deletes the Application. A reinstall generates a new UUID.

## **Preference Cookies**

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

## **Pseudonymous use**

When registering for this Website, Users have the option to indicate a nickname or pseudonym. In this case, Users' Personal Data shall not be published or made publicly available. Any activity performed by Users on this Website shall appear in connection with the indicated nickname or pseudonym. However, Users acknowledge and accept that their activity on this Website, including content, information or any other material possibly uploaded or shared on a voluntary and intentional basis may directly or indirectly reveal their identity.

## **Browser Fingerprinting**

Browser Fingerprinting creates an identifier based on a device's unique combination of characteristics (e.g. IP address, HTTP header, browser properties etc.), that allows to distinguish the User from other Users, thereby enabling to track the User's browsing behavior across the web. Browser Fingerprinting does not have an expiration date and cannot be deleted.

## **Equal protection of User Data**

This Website shares User Data only with third parties carefully selected to ensure that they provide the same or equal protection of User Data as stated in this privacy policy and requested by applicable data protection laws. Further information on data processing and privacy practices by third parties can be found in their respective privacy policies.

## **localStorage**

localStorage allows this Website to store and access data right in the User's browser with no expiration date.

## **Rights for registered California Users under the age of 18**

California's "Online Eraser" law, part of California's Business and Professions Code Sections 22580-22582, requires operators of certain websites and online services targeting minors to allow registered Users who are under the age of 18 and residents of California to request removal of content they post.

If a registered User fits that description and posted content on this Website, they may request removal of such content by contacting the Owner or its privacy policy coordinator at the contact details provided in this document.

In response to this request, the Owner may make content posted by the registered User invisible to other registered Users and the public (rather than deleting it entirely), in which case the content may remain on the Owner's servers. It may also be publicly available elsewhere if a third party copied and reposted this content.

## **sessionStorage**

sessionStorage allows this Website to store and access data right in the User's browser. Data in sessionStorage is deleted automatically when the session ends (in other words, when the browser tab is closed).

## **Unique device identification**

This Website may track Users by storing a unique identifier of their device, for analytics purposes or for storing Users' preferences.

## **Access the address book**

This Website may request access to your address book.

## **Cookie Policy**

This Website uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## **Further Information for Users in the European Union**

This section applies to all Users in the European Union, according to the General Data Protection Regulation (the "GDPR"), 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, and further information about Personal Data can be found in **the section titled "Detailed information on the processing of Personal Data" within this document**.

## **Legal basis of processing**

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## Further information about retention time

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

Therefore:

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

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

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

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

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

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

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

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

## Details about the right to object to processing

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

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

## How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be

communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **Transfer of Personal Data outside of the European Union**

### **Data transfer abroad based on consent**

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

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

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

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

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

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

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.

The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

### **Other legal basis for Data transfer abroad**

If no other legal basis applies, Personal Data shall be transferred from the EU to third countries only if at least one of the following conditions is met:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent;
- the data transferred is sourced from a public register created under the law of the country that the data originates from;
- subject to further conditions, the Owner has a compelling legitimate interest to perform a one-off transfer of Personal Data.

In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Website.

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

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

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

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

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

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

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

### **Data transfers according to a UK adequacy regulation**



If this is the legal basis, the transfer of Personal Data from the UK to third countries may take place according to a so called “adequacy regulation” of the UK Government.

The UK Government adopts adequacy regulations for specific countries or territories whenever such countries or territories guarantee Personal Data protection standards comparable to those set forth by UK data protection legislation. Users can find an updated list of all adequacy regulations on the website of the Information Commissioner’s Office (ICO).

### **Other legal basis for Data transfer abroad (UK)**

If no other legal basis applies, Personal Data shall be transferred from the UK to third countries only if at least one of the following conditions is met:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User’s request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent;
- the data transferred is sourced from a public register created under UK law;
- subject to further conditions, the Owner has a compelling legitimate interest to perform a one-off transfer of Personal Data.

In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Website.

## **Additional information about Data collection and processing**

### **Legal action**

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

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) or use other Personal Data (such as the IP Address) for this purpose.

### **Information not contained in this policy**

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

### **Changes to this privacy policy**

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

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

### **Definitions and legal references**

#### **Personal Data (or Data)**

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

## **Usage Data**

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

## **User**

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

## **Data Subject**

The natural person to whom the Personal Data refers.

## **Data Processor (or Processor)**

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

## **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

## **This Website (or this Application)**

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

## **Service**

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

## **European Union (or EU)**

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

## **Cookie**

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

## **Tracker**

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

## **Full access**

Full access to the account, including permanent deletion of threads and messages.

## **Read only access**

Read all resources and their metadata—no write operations.

## **Read metadata**

Read resources metadata including labels, history records, and email message headers, but not the message body or attachments.

**Modify**

All read/write operations except immediate, permanent deletion of threads and messages, bypassing Trash.

**Insert and import**

Insert and import messages only.

**Compose**

Create, read, update, and delete drafts. Send messages and drafts.

**Basic settings management**

Manage basic mail settings.

**Sensitive settings management**

Manage sensitive mail settings, including forwarding rules and aliases.

**Legal information**

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

Latest update: December 03, 2023